DANONE PERSONAL DATA PRIVACY POLICY

DANONE
ONE PLANET. ONE HEALTH

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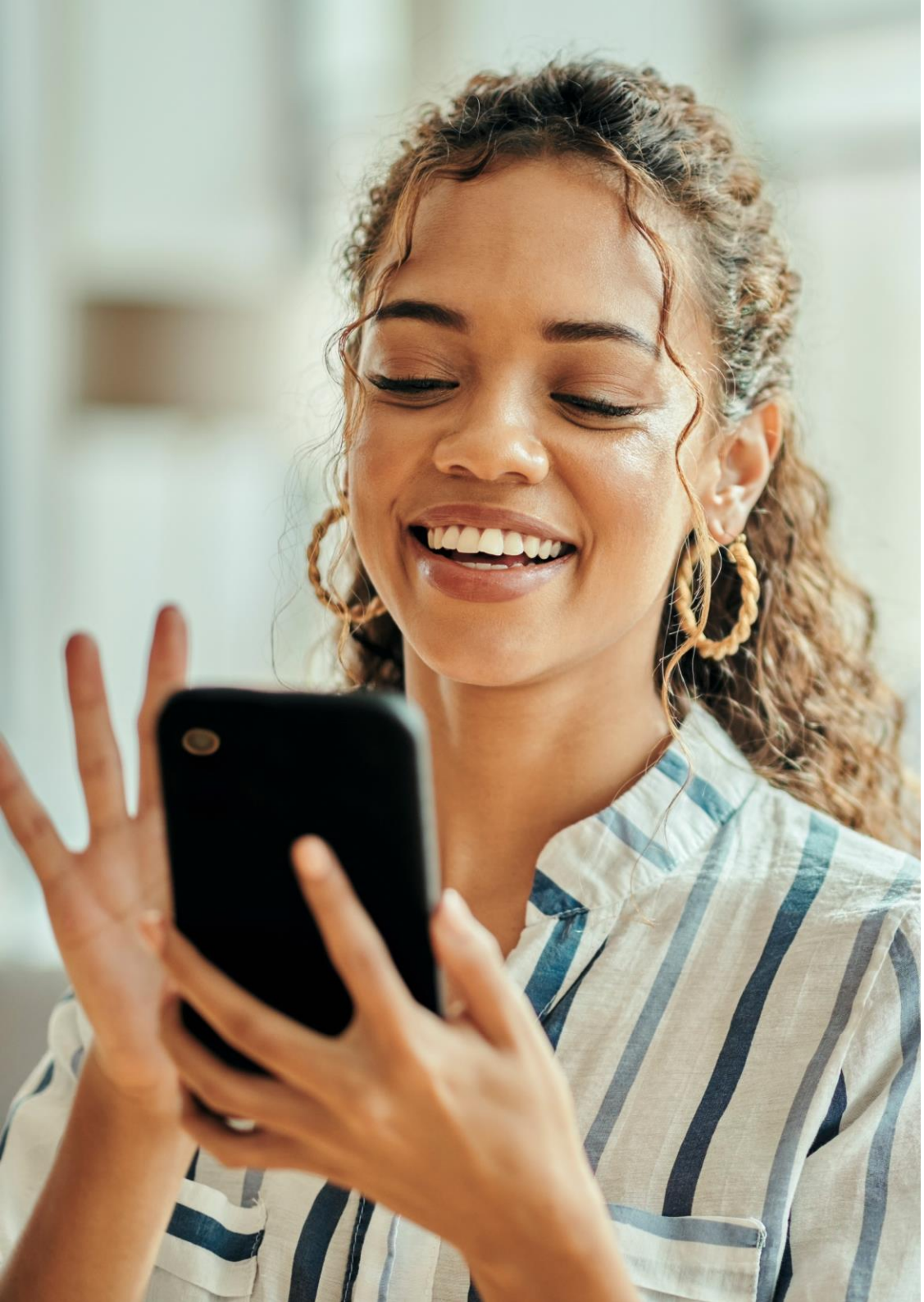
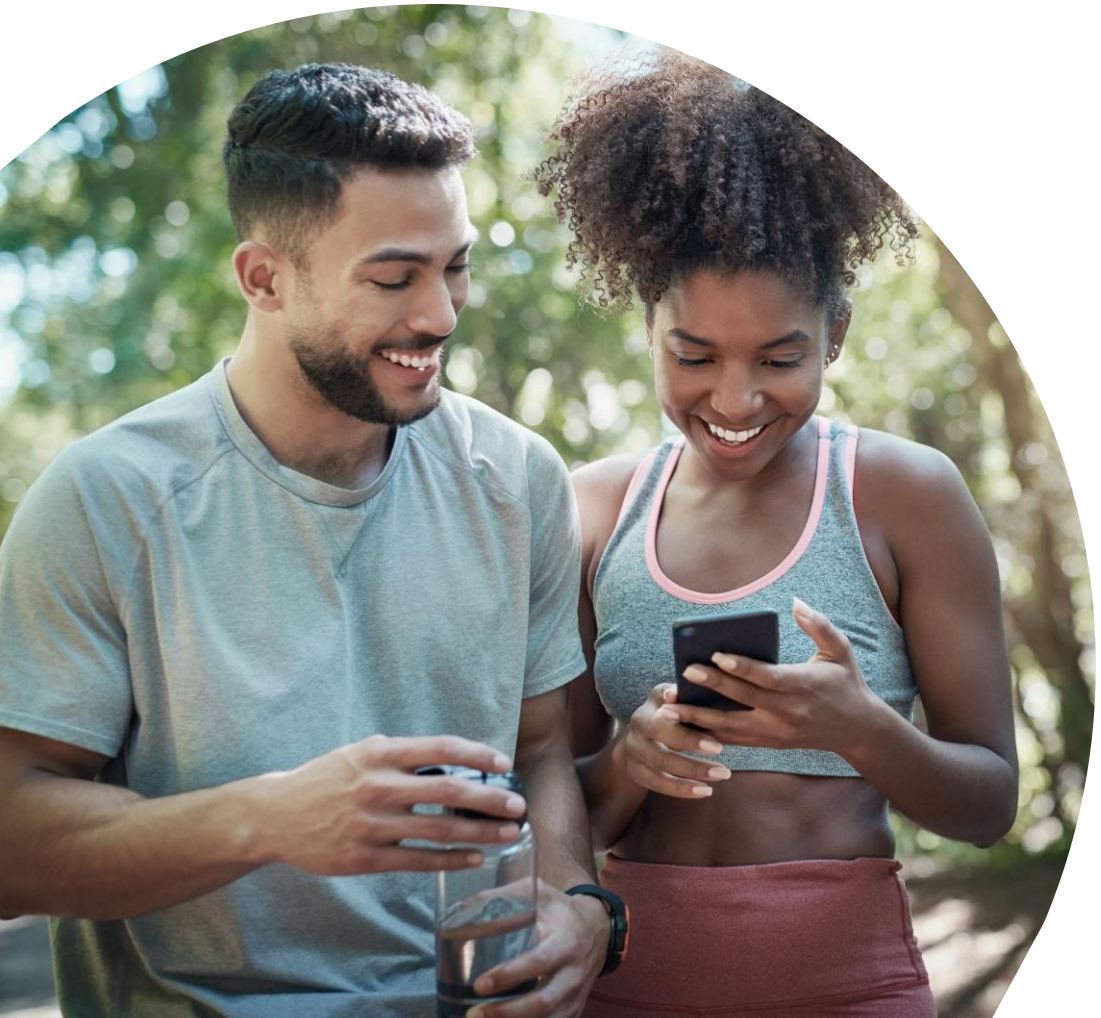


INTRODUCTION

At Danone, we value the rights and freedoms of individuals. This Personal Data Privacy Policy (hereafter “this Policy”) ensures the protection of consumers’, patients’, employees’, partners’ and other external stakeholders’ personal data processed by Danone.



In conjunction with our Danone Code of Business Conduct, we are committed to respecting the values and principles set out in this Policy in all our personal data processing activities.

We believe that safeguarding personal data is fundamental to fostering trust with consumers, patients, employees, partners and other external stakeholders we interact with. Our approach is built on transparency, accountability and a culture of privacy embedded in every level of our organization.

Personal data is all information about an identified or identifiable person. Common examples of personal data are an individual’s name, email address, and place of residence. But it can also be a purchase history, a bank account number, and even personal preferences can qualify as personal data if they can be traced back to the individual.

Whether or not this information is publicly accessible, such as on social media, is not relevant. It remains classified as personal data. In short, ‘personal data’ covers a broad spectrum of information. Certain categories of personal data are particularly sensitive and should be handled with care, such as data relating to an individual’s health.

Processing of personal data is any operation which is performed on personal data, whether or not by automated means, such as collection, recording, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

WHO DOES THIS POLICY APPLY TO?

This Policy applies to all employees of entities within Danone group (including entities which are not 100% owned but are consolidated under the global integration method by Danone).

We expect third parties processing personal data on behalf of Danone to adhere to principles equivalent to this Policy.

Every employee involved in processing personal data is responsible for adhering to this Policy and must in particular:

- Know and understand this Policy.
- Comply with this Policy as well as all applicable data protection laws and regulations for all personal data processing activities.

Non-compliance with this Policy will not be tolerated and may result in disciplinary sanction in compliance with Danone's Disciplinary Code for Business conduct breach and / or legal action.

DATA PRIVACY PRINCIPLES AT DANONE

At Danone, we acknowledge that privacy is a fundamental right. We are committed to handling personal data responsibly, in accordance with the principles outlined in this Policy.

The following principles must be adhered to whenever personal data is collected and processed by or on behalf of Danone:

PRINCIPLE 1

A Privacy by Design approach

Danone practices and promotes responsible handling of personal data. As part of this commitment, we integrate **data privacy considerations** into our activities, systems and processes from the very beginning. In other words, when developing, selecting or using applications, services and products that are based on the processing of personal data or that process personal data to fulfil their task, we take into account the right to data protection, including the data privacy principles below.

PRINCIPLE 2

A specific and legitimate purpose

Danone collects and processes personal data solely for **specific and legitimate** purposes that align with our business activities. We will not use personal data in ways that are incompatible with the original reason for which it was collected.

For example, to send personalized marketing communications, offers, and promotions to our consumers (with their consent where required), or to address enquiries received by our consumer service.

PRINCIPLE 3

Minimized collection and processing

Any personal data we collect and process is **relevant and limited** to what is necessary for its intended purpose. This means that we identify, collect and store the personal data we need to fulfil this purpose, but no more. We do not collect personal data on the off-chance that it might be useful in the future.

For example, for a promotional contest, Danone collects the information necessary to administer the contest and notify winners, such as name and contact information, but we do not collect irrelevant personal data such as demographic data.

PRINCIPLE 4

Accuracy

Danone ensures that personal data is kept **accurate and up to date**. We take all reasonable steps to promptly correct or delete any inaccurate or outdated personal data when individuals are not given the possibility to do so directly (for example through their client or candidate account).

PRINCIPLE 5

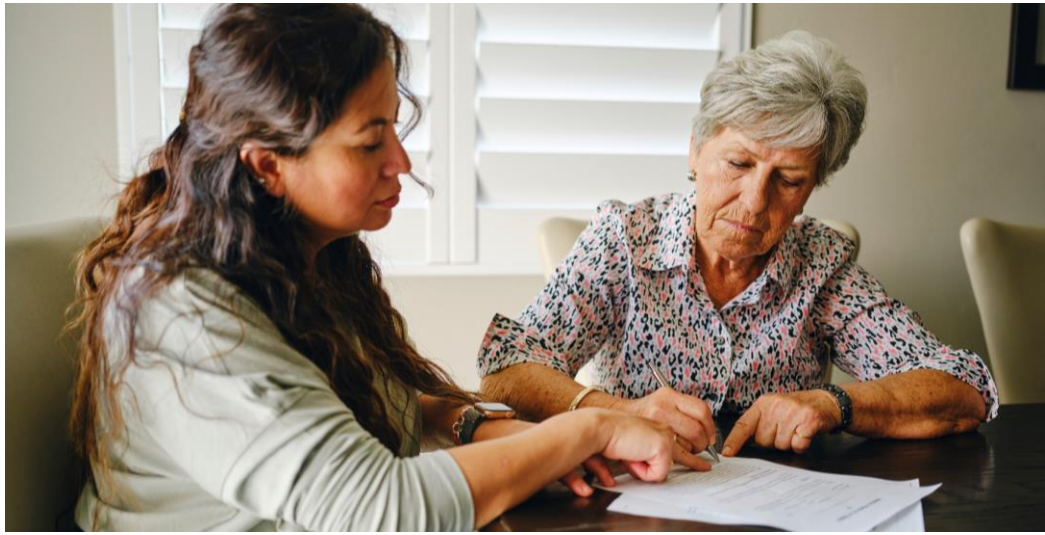
Lawful processing

Danone only collects and processes personal data where there is a **lawful basis** for doing so, in line with applicable data protection laws and regulations. Accordingly, any processing must be based on the individual's consent or another legal ground, such as fulfilling a contract with the individual, complying with a legal obligation, or pursuing Danone's legitimate interest.

PRINCIPLE 6

Transparency

We uphold transparency by clearly communicating our data processing practices through **privacy statements and notices**, which are shared with individuals via relevant channels such as our websites. They provide detailed information about the personal data that we collect, why we process it, how we obtain, store and retain the data, and with whom we share it. They also provide precise guidance on how individuals can exercise their data privacy rights.



PRINCIPLE 7

Responsible data sharing with third parties

When necessary to conduct its activities, Danone may need to **share personal data with trusted third parties** (e.g. cloud services providers, customer relationship management systems, marketing agencies or external recruitment agencies).

Appropriate measures are put in place to ensure the proper protection of transferred personal data. Danone holds those third parties to stringent quality standards and formalizes these expectations through data processing clauses or agreements.

We exercise additional caution when **transferring personal data internationally**. In such cases, Danone makes sure that the appropriate data transfer mechanism is in place to provide a level of data protection that is at least equivalent to the standards of the jurisdiction from which the data is exported.

PRINCIPLE 8

Appropriate protection

Depending on the specific processing activity, we take all appropriate measures and regularly review and update our systems to ensure the **security** and proper handling of personal data:

We implement both organizational and technical safeguards to maintain an appropriate level of security, protecting personal data against accidental or unlawful destruction, loss, alteration, unauthorized disclosure, or access.

Access to personal data is strictly limited to authorized personnel on a need-to-know basis, which means only when access to these data is required to fulfil their jobs responsibilities.

We ensure that our employees and partners apply proper security practices, such as using secure passwords, locking devices, maintaining a clean workspace, and being vigilant about potential security risks.

In cases where we handle special or sensitive personal data, such as health data or data concerning children, we implement additional safeguards (such as anonymisation, pseudonymisation, enhanced authentication, more stringent access management, and stronger encryption at rest or in transit) to ensure that this data is treated with the appropriate level of security and confidentiality, including sufficient guidance and trainings to our employees.

PRINCIPLE 9

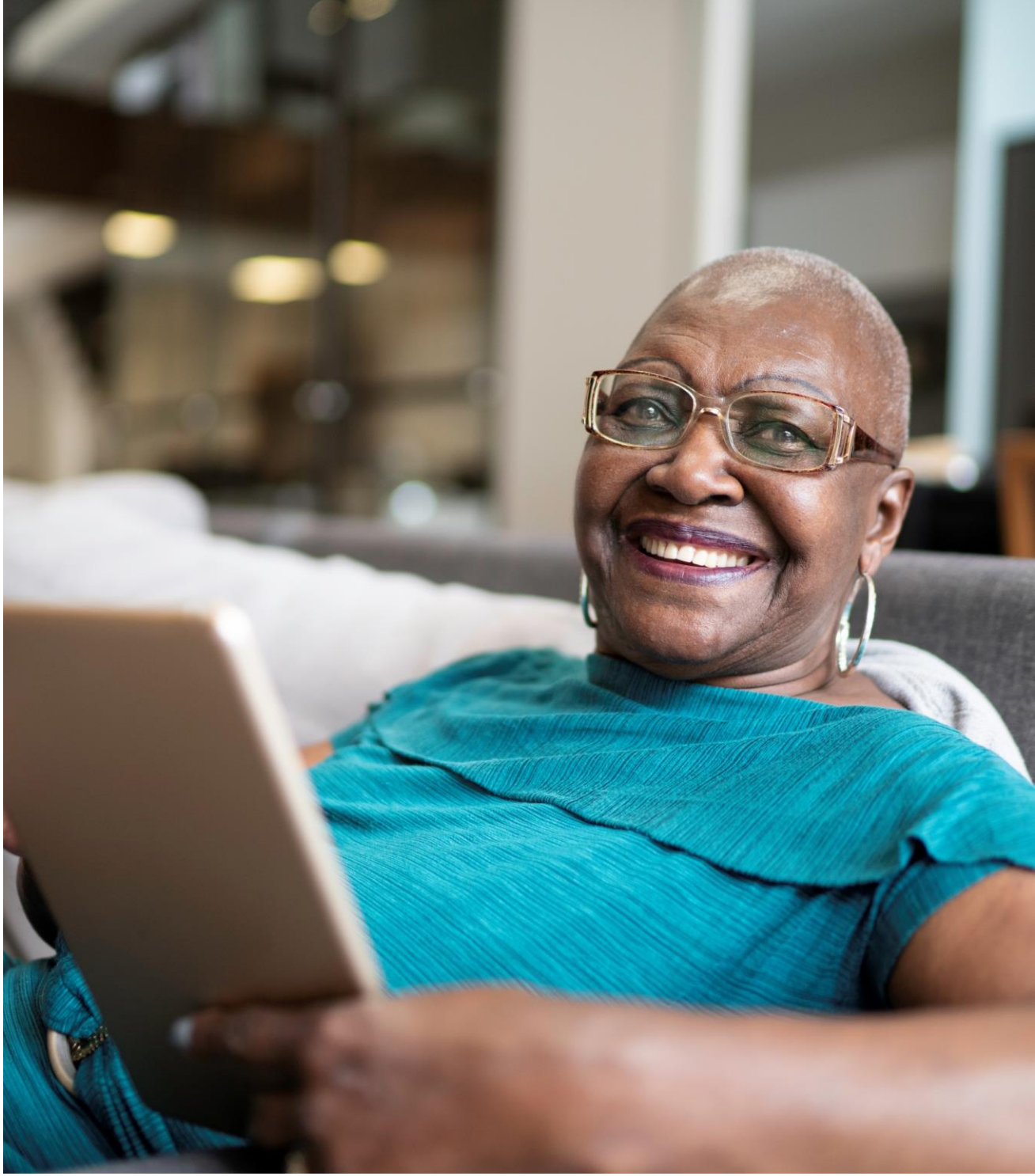
Limited retention periods

We establish clear **retention periods** to manage the personal data we process, making certain that any personal data is retained in compliance with legal requirements and only for as long as necessary to fulfil its intended purposes. At the expiration of the retention period, we must either erase the personal data or anonymize it.

PRINCIPLE 10

Data privacy rights

Danone recognizes the importance of providing individuals control over their personal data. To facilitate this, we strive to make it as straightforward as possible for individuals to exercise **their data privacy rights**, including the right to access, rectify, or erase their personal data, in accordance with applicable laws.



OUR DATA PRIVACY COMPLIANCE PROGRAM

Our commitments to data privacy, outlined in this Policy, are implemented through Danone's comprehensive data privacy compliance program.

This program includes continuous education and awareness initiatives. Regular training sessions are conducted to ensure that all employees who are entrusted with the processing of personal data are familiar with and understand their responsibilities under data protection laws and regulations and Danone company policies.

We have a strong governing structure, which is a combined effort from cross-functional teams to ensure protection of personal data. Our governance framework includes the **designation of Data Protection Officers or data privacy experts** and the inclusion of data privacy reports at the agenda of relevant boards and committees.

We have one dedicated **data privacy internal control evaluation** and targeted **audits** to assess processes in place, to verify the lawful use of personal data and where necessary identify potential enhancements in our data privacy practices.

Danone's data privacy compliance program is subject to continuous review and enhancement, to ensure its ongoing effectiveness. We actively monitor trends and developments in data privacy regulations and case laws and we keep our employees informed of changes relevant to their roles, and adapt our policies and practices accordingly.

RAISE A CONCERN

At Danone, we take privacy concerns seriously. All Danone employees are responsible for complying with the principles set out in this Policy. The third parties processing personal data on behalf of Danone must also adhere to principles equivalent to this Policy.

We want to know immediately about any breach or potential breach of this Policy and applicable data privacy laws and regulations.

Anyone having a data privacy concern, whether inside or outside the Danone organization, is always encouraged to discuss it directly with the relevant point of contact in Danone. For employees, this can be their line manager, HR, local Compliance Officer or Data Protection Officer.

We also have a dedicated reporting tool called DANONE ETHICS LINE, that can be used anonymously by anyone.
You can access this tool either by visiting www.danoneethicsline.com or by scanning this QR code.

There will be no retaliation against anyone who reports a genuine concern in good faith. All cases reported will be appropriately investigated and, where breaches are found, relevant actions will be taken.