

IP-125.EN - PRIVACY POLICY FOR RECRUITMENT

The **Frulact Group** is committed to ensuring the security and privacy of your personal data. This document aims to provide information to candidates involved in the Frulact Group's recruitment and selection processes regarding the processing of their personal data, as well as the privacy and security practices adopted. Its goal is to communicate the Group's commitment and respect for the rules related to privacy and personal data protection, in accordance with applicable data protection legislation.

Note on International Application

Given the global operations of the **Frulact Group** and the existence of entities established both inside and outside the European Economic Area (EEA), this policy — approved by the headquarters in Portugal — is generally structured in compliance with the requirements established by Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (General Data Protection Regulation – GDPR). Without prejudice to the above, there may be specific situations where national laws applicable in jurisdictions where the Group operates impose additional obligations, restrictions, or specific requirements regarding personal data processing, particularly concerning special categories of data, retention, international transfers, or employee monitoring. In such cases, the application of this policy will be aligned with the applicable local legislation, adopting the solution that ensures the highest level of personal data protection and full legal compliance, without prejudice to compliance with mandatory rules of the respective legal system

SCOPE

This Privacy Policy exclusively to the collection and processing of personal data that is performed by the **Frulact Group** as part of the recruitment and selection process for the admission of Employees.

The processing of data is necessary to complete the whole process and stages of recruitment provided that the holder wishes to apply for such recruitment.

It applies to all applications, either spontaneous or response to recruitment procedures, available on our website www.frulact.com in **JOBS**: <https://frulact.com/jobs/opportunities/>, via LinkedIn or recruitment agencies.

Applications submitted on paper are also applicable when addressed to the Human Resources department of the **Frulact Group**, responsible for recruitment procedures.

It shall apply to any other personal data which the applicant may provide, in any way, to us or the appropriate body to intervene in the recruitment and selection process.

The **Frulact Group** may also collect information concerning the Applicant from publicly available sources, public bodies and contacts made available by the Applicant himself, to complement and/or confirm the information provided by it in the recruitment and selection procedure.

PERSONAL DATA

Personal data refers to any information, regardless of its nature or format — Including sound and images — relating to an identified or identifiable natural person.

A person is considered identifiable if they can be identified, directly or indirectly, particularly through reference to an identification number or one or more factors specific to their physical, physiological, psychological, economic, cultural, or social identity.

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The **Frulact Group** is the entity responsible for collecting and processing Candidates' Personal Data and determines the data collected, the processing methods, and the purposes for which the data is used. It can be contacted via email at **info@frulact.com** or at our facilities.

The Frulact Group has appointed a **Data Protection Officer (DPO)**. The DPO is available to clarify any questions or provide additional information regarding the processing of your personal data. You can contact the DPO at: security@frulact.com.

WHAT DATA WE COLLECT

For the recruitment process, the **Frulact Group** processes various categories of personal data such as:

- name,
- address,
- telephone and email contact,
- professional experience,
- educational qualifications,
- citizen card number,
- tax identification number,
- Age (if allowed)
- others mentioned in the application form to be completed by the Candidate.

We may also collect personal data through third parties, such as specialized recruitment companies, references, previous employers, employment background checks, as permitted by law.

THE PURPOSES FOR THE TREATMENT

The Personal Data collected will be processed for the purposes of selection and recruitment of the Candidate and, if selected, to integrate the staff of the **Frulact Group** within the framework of a working relationship and/or internship.

All data collected are collected in compliance with legal obligations, execution of pre-contractual procedures and/or some legitimate interest of the **Frulact Group**.

RETENTION PERIOD

The Personal Data referred to above may be retained by the **Frulact Group** for the time necessary for the purpose referred to above:

- **up to 1 (one) year from the submission of the application** through which these data were provided, in the case of a spontaneous application and if the Applicant has not integrated any recruitment process of the **Frulact Group** during that period, or
- **up to 1 (one) year from** the end of the recruitment procedure in which the collection of such data took place, if the Applicant has not been engaged, in order to enable future contacts to be made by the **companies of the Frulact Group** to the Candidate in order to integrate other recruitment processes that will be launched by him in the indicated.

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- **In addition to this period** and in case we wish to keep your personal data to consider it in future employment opportunities, we will request your consent to be part of one of our recruitment programs.

DATA SHARING

The Personal Data of Candidates may be shared among companies belonging to the **Frulact Group**, in companies based in the United States of America, Canada, Morocco, South Africa, Switzerland, Germany and France. All the activities of these companies are subordinated and are guided by the same rules and principles in force at headquarters.

They may also be dealt with by other entities to which the **Frulact Group** has subcontracted their treatment, such as specialized recruitment companies and temporary work agencies, contracted to carry out the evaluation and selection of applications, interviews, verification of qualifications or other Candidates' data.

WHAT ARE YOUR RIGHTS

The Candidate may exercise, at any time, their rights regarding the protection of personal data by submitting a written request addressed to the Information Security and Privacy Committee, via the following email address: secutiry@frulact.com.

Under the GDPR and applicable legislation, the candidate has, in particular, the following rights:

- **Right of Access:** the right to obtain confirmation of which personal data concerning them is being processed and, if so, to access that information.
- **Right to Rectification:** the right to request the correction of inaccurate personal data and to request that incomplete personal data be updated.
- **Right to Erasure:** the right to request the deletion of personal data, except in cases where there are grounds that justify its retention, such as situations where we must keep the data to comply with a legal obligation or because there is an ongoing judicial process.
- **Right to Restriction of Processing:** the right to obtain the restriction of processing of their personal data when it concerns certain categories of data or specific processing purposes.
- **Right to Data Portability:** the right to receive the personal data provided to us in a structured, commonly used, and machine-readable format, and the right to request the transmission of that data to another controller.
- **Right to Object:** the right to object, at any time, to the processing of their personal data for reasons related to their particular situation, whenever the processing is based on:
(i) the performance of a task carried out in the public interest or in the exercise of official authority;
(ii) the pursuit of the legitimate interests of the controller or a third party;
(iii) the reuse of data for a purpose different from the one that motivated its initial collection, including profiling.
- **Right to Withdraw Consent:** if processing is based on consent, the candidate has the right to withdraw it at any time, without affecting the lawfulness of the processing carried out based on the previously given consent.
- The candidate may also submit a complaint to the National Supervisory Authority – **CNPD**, if they believe that their rights regarding personal data have been violated.

Some data requested from the Candidate during the recruitment process may constitute mandatory requirements for evaluating the application for certain positions. In such cases, the Frulact Group will inform the Candidate that, if the required data is not provided, the application cannot be assessed.

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The **Frulact Group** has implemented technical, operational, and organizational security standards through internal policies, procedures, and controls to protect personal data against loss, misuse, alteration, or destruction. Only authorized persons within the Frulact Group and our duly identified and authorized third-party service providers have access to personal data and are required to treat this information as confidential.

Despite these precautions, we cannot guarantee that unauthorized individuals will not gain access to your personal data.

CONTACT

For further clarification on this Policy, you should contact us by sending your questions to the following address: SECURITY@FRULACT.COM.

CHANGES TO THE PRIVACY POLICY FOR RECRUITMENT

The **Frulact Group** reserves the right at any time to readjust or amend this Recruitment Privacy Policy.

We therefore advise you to consult our website (www.frulact.com) where the information will always be kept up to date