

PRIVACY NOTICE

ONTRACKnl (formally Koninklijke Ahold Delhaize N.V.) has created this privacy notice to explain how we collect and use personal data that we collect through the website www.ontracknl.com ("Website").

We recommend that you read this notice carefully to understand how we use your personal data. If you have any complaints or questions after reading this notice, please contact us at dataprotection@aholddelhaize.com.

What types of personal data do we use and how do we use your personal data?

We collect the following personal data provided by you when you register on the Website: your email address and the preferred theme's you select (if any).

We use this personal data for our legitimate interest to discover which themes our website visitors are most interested in and to keep you updated via email on developments on ONTRACKnl based on your consent.

We make use of Google reCAPTCHA to prevent abuse of the email registration functionality. reCAPTCHA works by collecting hardware and software information, such as device and application data, and sending these data to Google for analysis. The information collected in connection with your use of the service will be used for improving reCAPTCHA and for general security purposes. It will not be used for personalized advertising by Google.

Who has access to your personal data?

Access to your personal data is limited to personnel with a business need-to-know the information for the above-mentioned purpose.

We may also share your personal data with the following parties:

- Third parties acting on our behalf (processors). In such cases, these third parties may only use your personal data for the purposes described above and only in accordance with our instructions.
- If required to do so by law or court order, for example with law enforcement agencies or other governmental agencies.

How long will we keep your personal data?

We retain your personal data for a limited amount of time and we will delete or anonymize this information after it is no longer necessary for the above-mentioned purposes. Your email address will be deleted ultimately one year after your registration.

What measures do we take to protect your personal data?

We have taken appropriate technical and organizational measures to protect your personal data against accidental or unlawful processing by ensuring that:

- your personal data is protected against unauthorized access or modification;
- the confidentiality of your personal data is assured;
- the availability of your personal data will be maintained;
- vendors acting on our behalf have received instructions on how to protect your personal data;
- personnel are trained to treat your personal data in a secure way; and
- actual or suspected data breaches are reported in accordance with applicable law.

Where do we store your personal data?

We are a global organization with headquarters in the Netherlands. Your personal data may be stored and processed in any country where we have facilities or in which we engage service providers. In some cases, your personal data may be transferred to a country outside the European Economic Area ("EEA").

Some of the non-EEA countries are recognized by the European Commission as providing an adequate level of data protection according to EEA standards. For transfers from the EEA to countries not considered adequate by the European Commission, we have put in place adequate measures, such as contractual measures (Standard

Contractual Clauses) to safeguard the protection of your personal data. The template for these Standard Contractual Clauses is issued by the European Commission and is available [here](#). Alternatively, you can contact us to obtain a copy of these Standard Contractual Clauses.

What rights can you exercise regarding your personal data?

You can request to access, rectify, erase or restrict personal data that you have previously provided to us. You can also object to our use of your personal data, or, where we process personal data based on consent, withdraw your consent. Furthermore, you can request to receive an electronic copy of your personal data for the purposes of transmitting it to another company (data portability). We explain each of these requests below. In each case, please send an email to dataprotection@aholddelhaize.com if you would like to exercise any of your rights. We will respond to your request consistent with applicable law.

Access

You are entitled to request access to the personal data we hold about you and to learn details about what data we collect and for what purpose we use it.

Rectification

We take reasonable steps to ensure that the information we hold about you is accurate and complete. However, if you do not believe this is the case, you can ask us to update or amend it.

Erasure

In certain circumstances, you have the right to ask us to erase your personal data, for example where the personal data we collected are no longer necessary for the original purpose. However, this will need to be balanced against other factors. For example, we may not be able to comply with your request due to certain legal or regulatory obligations.

Restriction of processing

In certain circumstances, you are entitled to ask us to temporarily stop using your personal data, for example where you think that the personal data we hold about you may be inaccurate or where you think that we no longer need to use your personal data.

Data portability

In certain circumstances, you have the right to ask that we transfer personal data that you have provided to us, to you or to a third party of your choice.

Objection

You have the right to object to processing, on grounds particular to your situation and where the processing is based on our legitimate interests. Unless we have a compelling legitimate ground for the processing, we will no longer process the personal data on that basis when you file an objection. Note, however, that we may not be able to provide certain services or benefits if we are unable to process the necessary personal data for that purpose.

Withdraw consent

We may ask for your consent to process your personal data in specific cases. When we do this, you have the right to withdraw your consent at any time.

You also may contact our Data Protection Officer at dataprotection@aholddelhaize.com or lodge a complaint with a data protection authority for your country or region, or where an alleged infringement of applicable data protection law occurs.

We may update this notice from time to time. This version was published on April 30, 2021.