

# GENUS PLC EXTERNAL PRIVACY POLICY FOR EUROPE AND SOUTH AFRICA

## INTRODUCTION

- This Privacy Policy explains what we do with your personal data. It describes how we collect, use and process your personal data, and how, in doing so, we comply with our legal obligations to you. Your privacy is important to us, and we are committed to protecting and safeguarding your data privacy rights.
- This Privacy Policy applies to the personal data of [Customers](#), [Distributors](#), [Suppliers](#), [Job Applicants](#), [Website Users](#) and [other people whose personal data may be processed](#), such as the emergency contacts and dependents of our [Employees](#). To be clear, if you are an [Employee](#), you should refer to the Genus Employee Privacy Policy which is available on Helix, the Genus intranet.
- This Privacy Policy applies to personal data processed by Genus plc or an [Associated Company](#) (“**Genus**” or “**us**”). For the purpose of applicable data protection legislation (including but not limited to the General Data Protection Regulation (Regulation (EU) 2016/679) (the “**GDPR**”) or South Africa’s Protection of Personal Information Act 4 of 2013 (“**POPIA**”), the company responsible for your personal data can be found [here](#). Please note that references to “Genus” should be read as “PIC” or “ABS” as relevant depending on which Genus Associated Company you are interacting with.
- It is important to point out that we may amend this Privacy Policy from time to time. Please just visit this page if you want to stay up to date, as we will post any changes here.
- If you are dissatisfied with any aspect of our Privacy Policy, you may have legal rights. We have described these as well where relevant.
- This Privacy Policy applies in relevant countries throughout our European network. Different countries may approach data privacy in slightly different ways and so we may also have country-specific parts to this Privacy Policy. You can find country-specific terms for your jurisdiction [here](#). This allows us to ensure that we’re complying with all applicable data privacy protections.

## SUMMARY

### What kind of personal data do we collect?

- **CUSTOMER DATA:** If you are a Customer, we need to collect and use information about you in the course of providing you services.
- If you would like a more detailed description of the personal data that we collect in this way, please click [here](#).
- To the extent that you access our website we will also collect certain data from you. If you would like more information about this, please click [here](#).
- **DISTRIBUTOR DATA:** We need a small amount of information from our [Distributors](#) to ensure that things run smoothly. We need contact details of relevant individuals at your organisation so that we can communicate with you. We also need other information such as your bank details so that we can pay for the services you provide.
- If you would like a more detailed description of the personal data that we collect about you, please click [here](#).

- To the extent that you access our website we will also collect certain data from you. If you would like more information about this, please click [here](#).
- **SUPPLIER DATA:** We need a small amount of information from our [Suppliers](#) to ensure that things run smoothly. We need contact details of relevant individuals at your organisation so that we can communicate with you. We also need other information such as your bank details so that we can pay for the services you provide.
- If you would like a more detailed description of the personal data that we collect about you, please click [here](#).
- To the extent that you access our website we will also collect certain data from you. If you would like more information about this, please click [here](#).
- **JOB APPLICANTS:** Depending on the relevant circumstances and applicable local laws and requirements, we may collect personal data from you to enable us to engage in a recruitment exercise.
- If you would like a more detailed description of the personal data that we collect about you, please click [here](#).
- To the extent that you access our website we will also collect certain data from you. If you would like more information about this, please click [here](#).
- **PEOPLE WHOSE DATA WE RECEIVE FROM JOB APPLICANTS AND STAFF, SUCH AS REFEREES AND EMERGENCY CONTACTS:** We only ask for very basic contact details, so that we can get in touch with you either for a reference or because you've been listed as an emergency contact for one of our [Staff](#) members.
- If you would like a more detailed description of the personal data that we collect about you, please click [here](#).
- **WEBSITE USERS:** We collect a limited amount of data from our [Website Users](#) which we use to help us to improve your experience when using our website and to help us manage the services we provide. This includes information such as how you use our website, the frequency with which you access our website, and the times that our website is most popular.
- If you would like to find out more information about what data we collect about you when you visit our website, please click [here](#).

A number of elements of the personal data we collect from you are required to enable us to fulfil our contractual duties to you or to others. Other items may simply be needed to ensure that our relationship can run smoothly.

Depending on the type of personal data in question and the grounds on which we may be processing it, should you decline to provide us with such data, we may not be able to fulfil our contractual requirements or, in extreme cases, may not be able to continue with our relationship.

For details of the legal bases that we rely on to be able to use and process your personal data, please click [here](#).

#### How do we collect your personal data?

- **CUSTOMER DATA:** There are three main ways in which we collect your personal data:
  1. Directly from you; and
  2. From third parties; and
  3. From other limited sources.
- If you would like to know more about how we collect your personal data, please click [here](#).

- To the extent that you access our website or read or click on an email from us, we may also collect certain data automatically or through you providing it to us. For more information please click [here](#).
- **DISTRIBUTOR DATA:** There are three main ways in which we collect your personal data:
  1. Directly from you; and
  2. From third parties; and
  3. From other limited sources.
- If you would like to know more about how we collect your personal data, please click [here](#).
- To the extent that you access our website or read or click on an email from us, we may also collect certain data automatically or through you providing it to us. For more information please click [here](#).
- **SUPPLIER DATA:** We collect your personal data during the course of our work with you.
- To the extent that you access our website or read or click on an email from us, we may also collect certain data automatically or through you providing it to us. For more information please click [here](#).
- **JOB APPLICANTS:** There are three main ways in which we collect your personal data:
  1. Directly from you; and
  2. From third parties; and
  3. From other limited sources.
- If you would like to know more about how we collect your personal data, please click [here](#).
- To the extent that you access our website or read or click on an email from us, we may also collect certain data automatically or through you providing it to us. For more information please click [here](#).
- **PEOPLE WHOSE DATA WE RECEIVE FROM STAFF, SUCH AS REFEREES AND EMERGENCY CONTACTS:** We collect your contact details only where a member of our [Staff](#) puts you down as their emergency contact or where a [Job Applicant](#) gives them to us in order for you to serve as a referee.
- **WEBSITE USERS:** We collect your data automatically via cookies when you visit our website, in line with cookie settings in your browser. If you would like to find out more about cookies, including how we use them and what choices are available to you, please click [here](#).

### How do we use your personal data?

- **CUSTOMER DATA:** We use your personal data is to ensure that the contractual arrangements between us can properly be implemented so that the relationship can run smoothly.
- For more details on how we use your personal data, please click [here](#).
- **DISTRIBUTOR DATA:** The main reasons for using your personal data are to ensure that the contractual arrangements between us can properly be implemented so that the relationship can run smoothly, and to comply with legal requirements.
- For more details on how we use your personal data, please click [here](#).

- **SUPPLIER DATA:** The main reasons for using your personal data are to ensure that the contractual arrangements between us can properly be implemented so that the relationship can run smoothly, and to comply with legal requirements.
- For more details on how we use your personal data, please click [here](#).
- **JOB APPLICANTS:** We use your personal data to ensure that we can carry out an appropriate recruitment exercise, to carry out equal opportunities monitoring, and to comply with legal requirements. .
- For more details on how we use your personal data, please click [here](#).
- **PEOPLE WHOSE DATA WE RECEIVE FROM JOB APPLICANTS AND STAFF, SUCH AS REFEREES AND EMERGENCY CONTACTS:** We may also use referees' personal data to contact them in relation to applications made by [Job Applicants](#) . We use the personal details of a [Job Applicant](#) or [Staff](#) member's emergency contacts in the case of an accident or emergency affecting that [Job Applicant](#) or member of [Staff](#).
- For more details on how we use your personal data, please click [here](#).
- **WEBSITE USERS:** We use your data to help us to improve your experience of using our website.
- If you would like to find out more about cookies, including how we use them and what choices are available to you, please click [here](#).
- Please note that communications to and from Staff including emails may be reviewed as part of internal or external investigations or litigation.

#### Who do we share your personal data with?

- **CUSTOMER DATA:** We may share your information with any of our group companies and associated third parties such as our service providers.
- If you would like to see a list of who we may share your personal data with, please click [here](#).
- **DISTRIBUTOR DATA:** Unless you specify otherwise, we may share your information with any of our group companies and associated third parties such as our service providers and organisations to whom we provide services.
- If you would like to see a list of who we may share your personal data with, please click [here](#).
- **SUPPLIER DATA:** Unless you specify otherwise, we may share your information with any of our group companies and associated third parties such as our service providers and organisations to whom we provide services.
- If you would like to see a list of who we may share your personal data with, please click [here](#).
- **JOB APPLICANTS:** Unless you specify otherwise, we may share your information with any of our group companies and associated third parties such as our service providers and organisations to whom we provide services.
- If you would like to see a list of who we may share your personal data with, please click [here](#).
- **PEOPLE WHOSE DATA WE RECEIVE FROM JOB APPLICANTS AND STAFF, SUCH AS REFEREES AND EMERGENCY CONTACTS:** Unless you specify otherwise, we may

share your information with any of our group companies and associated third parties such as our service providers and organisations to whom we provide services.

- If you would like to see a list of who we may share your personal data with, please click [here](#).
- **WEBSITE USERS:** Unless you specify otherwise, we may share your information with providers of web analytics services, marketing automation platforms and social media services to make sure any advertising you receive is targeted to you.

### How do we safeguard your personal data?

- We care about protecting your information. That's why we put in place appropriate measures that are designed to prevent unauthorised access to, and misuse of, your personal data.
- For more information on the procedures we put in place, please click [here](#).

### How long do we keep your personal data for?

- We will ordinarily process your data throughout the course of our interactions and will then generally retain it for an appropriate amount of time after we have parted ways, depending on local law requirements and our legitimate business and risk-management needs. Once this period of time had expired, we will [Delete](#) your personal data from our systems unless we believe in good faith that the law or other regulation requires us to preserve it (for example, because of our obligations to tax authorities or in connection with any anticipated litigation).
- For more information on our policy for the retention of personal data, please click [here](#).

### How can you access, amend or take back the personal data that you have given to us?

- Even if we already hold your personal data, you still have various rights in relation to it. To get in touch about these, please [contact us](#). We will seek to deal with your request without undue delay, and in any event in accordance with the requirements of any applicable laws. Please note that we may keep a record of your communications to help us resolve any issues which you raise.
- **Right to object:** If we are using your data because we deem it necessary for our legitimate interests to do so, and you do not agree, you have the right to object. We will respond to your request within 30 days (although we may be allowed to extend this period in certain cases). Generally, we will only disagree with you if certain limited conditions apply.
- **Right to withdraw consent:** Where we have obtained your consent to process your personal data for certain activities (for example, for profiling your suitability for certain roles), or consent to market to you, you may withdraw your consent at any time.
- **Data Subject Access Requests (DSAR):** Just so it's clear, you have the right to ask us to confirm what information we hold about you at any time, and you may ask us to modify, update or [Delete](#) such information. At this point we may comply with your request or, additionally do one of the following:
  - we may ask you to verify your identity, or ask for more information about your request; and
  - where we are legally permitted to do so, we may decline your request, but we will explain why if we do so.

- **Right to erasure:** In certain situations (for example, where we have processed your data unlawfully), you have the right to request us to “erase” your personal data. We will respond to your request within 30 days (although we may be allowed to extend this period in certain cases) and will only disagree with you if certain limited conditions apply. If we do agree to your request, we will [Delete](#) your data but will generally assume that you would prefer us to keep a note of your name on our register of individuals who would prefer not to be contacted. That way, we will minimise the chances of you being contacted in the future where your data are collected in unconnected circumstances. If you would prefer us not to do this, you are free to say so.
- **Right of data portability:** If you wish, you have the right to transfer your data from us to another data controller. We will help with this – either by directly transferring your data for you, or by providing you with a copy in a commonly used machine-readable format.
- **Right to lodge a complaint with a supervisory authority:** You also have the right to lodge a complaint with your local supervisory authority.
- If you would like to know more about your rights in respect of the personal data we hold about you, please click [here](#).

#### How do we store and transfer your data internationally?

- For more information on the steps we take when we transfer and store your data internationally, please click [here](#).

#### Who is responsible for processing your personal data on the website?

- Genus controls the processing of personal data on its website(s).
- If you’ve got any further questions, or want further details, please click [here](#).

#### What are cookies and how do we use them?

- A “cookie” is a bite-sized piece of data that is stored on your computer’s hard drive. They are used by nearly all websites and do not harm your system. We use them to track your activity to help ensure you get the smoothest possible experience when visiting our website. We can use the information from cookies to ensure we present you with options tailored to your preferences on your next visit. We can also use cookies to analyse traffic and for advertising purposes.
- If you want to check or change what types of cookies you accept, this can usually be altered within your browser settings. [We also provide information about this in our Marketing preferences page on the Genus website.
- If you want to find out more about cookies, including how we use them and what choices are available, please click [here](#).

#### How to reject cookies

- If you don’t want to receive cookies that are not strictly necessary to perform basic features of our site, you may choose to opt-out by changing your browser settings
- Most web browsers will accept cookies but if you would rather we didn’t collect data in this way you can choose to accept all or some, or reject cookies in your browser’s privacy settings. However, rejecting all cookies means that you may not be able to take full advantage of all our website’s features. Each browser is different, so check the “Help” menu of your browser to learn how to change your cookie preferences.
- For more information generally on cookies, including how to disable them, please refer to [aboutcookies.org](#). You will also find details on how to delete cookies from your computer.



## LONG FORM

### WHAT KIND OF PERSONAL INFORMATION DO WE COLLECT?

The information described below is in addition to any personal data we are required by law to process in any given situation.

- **CUSTOMER DATA:** We may collect details of individuals at your organisation (such as title, names, home address, business address, telephone numbers, job title, email address, bank details and farm size) in order to ensure our relationship runs smoothly and in order to comply with our legal and regulatory obligations. We also hold information relating to your online engagement with material published by Genus, which we use to ensure that our marketing communications to you are relevant, timely and in accordance with your marketing preferences. We may also hold extra information that someone in your organisation has chosen to tell us or that you have chosen to tell a Genus [Employee](#). If we need any additional personal data for any reason, we will let you know.
- To the extent that you access our website we will also collect certain data from you. If you would like more information about this, please click [here](#).
- **DISTRIBUTOR DATA:** We will may collect details of individuals at your organisation (such as names, telephone numbers, job title and email or postal addresses) in order to ensure our relationship runs smoothly. We also hold information relating to your online engagement with material published by Genus, which we use to ensure that our marketing communications to you are relevant, timely and in accordance with your marketing preferences. We may also hold extra information that someone in your organisation has chosen to tell us or that you have chosen to tell a Genus [Employee](#) . If we need any additional personal data for any reason, we will let you know.
- To the extent that you access our website we will also collect certain data from you. If you would like more information about this, please click [here](#).
- **SUPPLIER DATA:** We will collect your contact details or the details of individual contacts at your organisation (such as names, telephone numbers, job title and email or postal addresses, locations of relevant staff who liaise with us on behalf of your organisation) in order to ensure our relationship runs smoothly. We may also collect bank details, so that we can pay you. We may also hold extra information that someone in your organisation has chosen to tell us. In certain circumstances, such as when you engage with our Finance and Accounting teams , our calls with you may be recorded, depending on the applicable local laws and requirements.
- To the extent that you access our website we will also collect certain data from you. If you would like more information about this, please click [here](#).
- **JOB APPLICANT DATA:** Depending on the relevant circumstances and applicable local laws and requirements, we may collect some or all of the information listed below to enable us to engage in a recruitment exercise. In some jurisdictions, we are restricted from processing some of the data outlined below. In such cases, we will not process the data in those jurisdictions.
  - Name;
  - Age/date of birth;
  - National identification number;



- Sex/gender;
  - Marital status;
  - Contact details;
  - Education details;
  - Employment history;
  - Emergency contacts and details of any dependants;
  - Referee details;
  - Immigration status (whether you need a work permit);
  - Nationality/citizenship/place of birth;
  - A copy of your driving licence and/or passport/identity card;
  - Financial information (where we need to carry out financial background checks);
  - Social security number (or equivalent in your country) and any other tax-related information;
  - Diversity information including racial or ethnic origin, religious or other similar beliefs, and physical or mental health, including disability-related information;
  - Details of any criminal convictions if this is required for a role that you are interested in applying for;
  - Details about your current remuneration, pensions and benefits arrangements;
  - Extra information that you choose to tell us;
  - Extra information that your referees choose to tell us about you;
  - IP address; and
  - CCTV footage if you attend relevant Genus premises which have CCTV.
- Please note that the above list of categories of personal data we may collect is not exhaustive.
  - To the extent that you access our website we will also collect certain data from you. If you would like more information about this, please click [here](#).
  - **PEOPLE WHOSE DATA WE RECEIVE FROM JOB APPLICANTS AND STAFF, SUCH AS REFEREES AND EMERGENCY CONTACTS:** To ask for a reference, we need the referee's contact details (such as name, email address and telephone number). We will also need these details if a job applicant or an [Employee](#) has put you down as their emergency contact so that we can contact you in the event of an accident or an emergency.
  - We will collect your date of birth, postal address and potentially some health information if an [Employee](#) has put you down as a dependent for a benefit connected with their employment or if an Employee exercises certain employment rights. We may also be provided with information about your sexual orientation if an [Employee](#) identifies you as a spouse or partner when putting you down as a dependent or next of kin.
  - To the extent that you access our website we will also collect certain data from you. If you would like more information about this, please click [here](#).
  - **WEBSITE USERS** We collect a limited amount of data from our [Website Users](#) which we use to help us to improve your experience when using our website and to help us manage

the services we provide. This includes information such as how you use our website, the frequency with which you access our website, your browser type, the location you view our website from, the language you choose to view it in and the times that our website is most popular. If you contact us via the website, we will collect any information that you provide to us, for example your name and contact details.

- If you would like to find out more information about what data we collect about you when you visit our website, please click [here](#).

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## HOW DO WE COLLECT YOUR PERSONAL DATA?

- **CUSTOMER DATA** We collect Customer personal data in three ways:

1. Personal data that we receive directly from you;
2. Personal data that we receive from other sources; and
3. Personal information that we collect automatically.

### Personal data that we receive directly from you

- We will receive data directly from you in three ways:
  - When you speak to one of our Employees face to face; and/or
  - Where you contact us proactively, usually by phone or email; and/or
  - Where we contact you, either by phone or email.

### Personal data we receive from other sources

- Where appropriate and in accordance with any local laws and requirements, we may be provided with information about you from other sources including:
  - From third party market research and by analysing online and offline media (which we may do ourselves, or employ other organisations to do for us);
  - From another [Customer](#) (for example, where such [Customer](#) purchases or licences or intends to purchase or licence our goods, services, [Genetics](#) and/or [Genetic Products](#) on your behalf or collectively on behalf of a group of which you are part);
  - From a [Distributor](#) (for example, where you purchase Genetics or Genetic Products from a [Distributor](#)); and
  - From other limited third parties (such as a [Supplier](#) providing transportation services).

### Personal information we collect automatically

- To the extent that you access our website or read or click on an email from us, where appropriate and in accordance with any local laws and requirements, we may also collect your data automatically or through you providing it to us. For more information please click [here](#).

- **DISTRIBUTOR DATA** We collect Distributor personal data in three ways:

1. Personal data that we receive directly from you;
2. Personal data that we receive from other sources; and
3. Personal information that we collect automatically.

### Personal data that we receive directly from you

- We will receive data directly from you in two ways:

- Where you contact us proactively, usually by phone or email; and/or
- Where we contact you, either by phone or email.

#### Personal data we receive from other sources

- Where appropriate and in accordance with any local laws and requirements, we may be provided with information about you from other sources including:
  - From third party market research and by analysing online and offline media (which we may do ourselves, or employ other organisations to do for us); and
  - From other limited third parties (such as a [Supplier](#) providing administrative or transportation services).

#### Personal information we collect automatically

- To the extent that you access our website or read or click on an email from us, where appropriate and in accordance with any local laws and requirements, we may also collect your data automatically or through you providing it to us. For more information please click [here](#).
- **SUPPLIER DATA** We collect Supplier personal data in three ways:
  1. Personal data that we receive directly from you;
  2. Personal data that we receive from other sources; and
  3. Personal information that we collect automatically.

#### Personal data that we receive directly from you

- We will receive data directly from you in two ways:
  - Where you contact us proactively, usually by phone or email; and/or
  - Where we contact you, either by phone or email.

#### Personal data we receive from other sources

- Where appropriate and in accordance with any local laws and requirements, we may seek more information about you or your organisation from other sources generally by way of due diligence or other market intelligence including:
  - From third party market research and by analysing online and offline media (which we may do ourselves, or employ other organisations to do for us); and
  - From other limited sources and third parties.

#### Personal information we collect automatically

- To the extent that you access our website or read or click on an email from us, where appropriate and in accordance with any local laws and requirements, we may also collect your data automatically or through you providing it to us. For more information please click [here](#).
- **JOB APPLICANT DATA:** We collect personal data in three primary ways:
  1. Personal data that you give to us;
  2. Personal data that we receive from other sources; and
  3. Personal information that we collect automatically.

#### Personal data you give to us

- Genus needs to know certain information about you in order to engage in a recruitment exercise and appoint the best applicants to Genus.
- There are numerous ways you can share your information with us. It all depends on what suits you. These may include:
  - Entering your details on the Genus website or via an application form, as part of the registration process;
  - Leaving a hard copy CV at a Genus office; or
  - Emailing your CV to a Genus employee such as a Genus HR representative.

#### Personal data we receive from other sources

- We also receive personal data about job applicants from other sources. Depending on the relevant circumstances and applicable local laws and requirements, these may include personal data received in the following situations:
  - Your referees may disclose personal information about you;
  - We may obtain information about you from searching for potential applicants from third party sources, such as LinkedIn and other job sites;
  - If you 'like' our page on Facebook or 'follow' us on Twitter we will receive your personal information from those sites; and
  - If you were referred to us through a recruitment agency, they may share personal information about you with us.

#### Personal information we collect automatically

- To the extent that you access our website or read or click on an email from us, where appropriate and in accordance with any local laws and requirements, we may also collect your data automatically or through you providing it to us. For more information please click [here](#).
- **WEBSITE USERS:** When you visit our website there is certain information that we may automatically collect, whether or not you decide to use our services. This includes your IP address, the date and the times and frequency with which you access the website and the way you browse its content.
- We collect your data automatically via cookies, in line with cookie settings in your browser. If you are also a [Customer](#) or [Distributor](#), we may use data from your use of our websites to enhance other aspects of our communications with or service to you. If you would like to find out more about cookies, including how we use them and what choices are available to you, please click [here](#).

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#### HOW DO WE USE YOUR PERSONAL DATA?

Having obtained data about you, we then put it to good use.

- **CUSTOMER DATA:** We use Customer data for:
  - [Provision of Goods and Services](#);
  - [Marketing Activities](#); and
  - [To help us to establish, exercise or defend legal claims](#).

Here are some more details about each:

## Provision of Goods and Services

- Below are the various ways in which we use your data in order to ensure the smooth running of our business:
  - Processing your data in order to fulfil your orders for goods, services, [Genetics](#) and/or [Genetic Products](#), or orders made on your behalf or on behalf of a group of which you are part;
  - Storing your details (and updating them when necessary) on our database, so that we can contact you in relation to our relevant activities;
  - Keeping records of our communications and meetings, so that we can provide targeted services to you;
  - Ensuring compliance with the terms of our agreements with [Customers](#) and/or [Distributors](#) (as applicable);
  - Ensuring the confidentiality and protection of our proprietary confidential information and trade secrets;
  - Providing assistance (including technical assistance) to you or to other [Customers](#);
  - Undertaking customer satisfaction surveys; and
  - Processing your data for the purpose of targeting appropriate marketing campaigns.
- We may use your personal data for these purposes if we deem this to be necessary for our legitimate interests. If you would like to know more about what this means, please click [here](#).
- If you are not happy about this, in certain circumstances you have the right to object and can find out more about how and when to do this [here](#).

## Marketing Activities

- We may periodically contact you to provide you with information that we think you may find interesting. In particular, we may wish to use your data for the purposes listed below, where appropriate and in accordance with any local laws and requirements. Please note that this list is not exhaustive. To:
  - enable us to develop and market other goods, services, [Genetics](#) and/or [Genetic Products of Genus or our Associated Companies](#);
  - market our full range of goods, services, [Genetics](#) and/or [Genetic Products of Genus or our Associated Companies](#) to you; and
  - provide you with information about certain discounts and offers that you are eligible for by virtue of your relationship with Genus or other Associated Companies.
- We need your consent for some aspects of these activities which are not covered by our legitimate interests (in particular, the collection of data via cookies, and the delivery of direct marketing to you through digital channels) and, depending on the situation, we'll ask for this via an opt-in or soft-opt-in (which we explain further below). Please note that in certain of the jurisdictions in which we operate, we comply with additional local law requirements. For more information in relation to your jurisdiction, please click [here](#).
- Soft opt-in consent is a specific type of consent which applies where you have previously engaged with us (for example by submitting an order or requesting more information about our goods, services, [Genetics](#) and/or [Genetic Products](#)), and we are marketing other

goods, services, [Genetics](#) and/or [Genetic Products](#). Under 'soft opt-in' consent, we will take your consent as given unless or until you opt out. For certain types of e-marketing, we are required to obtain your explicit consent.

- If you want to know more about how we obtain consent, please click [here](#). If you are not happy about our approach to marketing, you have the right to withdraw your consent at any time and can find out more about how to do so [here](#). We want to let you know that even if you have opted out from our marketing communications through our preference centre, it is possible that your details may be recaptured through public sources in an unconnected marketing campaign. We ask that in those circumstances you opt out again.

#### **To help us to establish, exercise or defend legal claims**

- In more unusual circumstances, we may use your personal data to help us to establish, exercise or defend legal claims.
- **DISTRIBUTOR DATA:** We use Distributor data for:
  - [Provision of Goods and Services; and](#)
  - [To help us to establish, exercise or defend legal claims.](#)

Here are some more details about each:

#### **Provision of Goods and Services**

- Below are the various ways in which we use your data in order to ensure the smooth running of our business:
  - Processing your data in order to fulfil our agreements to you to purchase or licence [Genetics](#) and/or [Genetic Products](#);
  - Storing your details (and updating them when necessary) on our database, so that we can contact you in relation to our relevant activities;
  - Keeping records of our communications and meetings, so that we can provide targeted services to you;
  - Ensuring compliance with the terms of our agreements with you and/or your agreements with [Customers](#) (as applicable);
  - Providing approval of your agreements with relevant [Customers](#) in accordance with our agreements with you;
  - Ensuring the confidentiality and protection of our proprietary confidential information and trade secrets;
  - Providing training assistance (including technical assistance) to you or to other [Customers](#) and/or [Distributors](#) (as applicable);
  - Undertaking Distributor satisfaction surveys; and
  - Processing your data for the purpose of targeting appropriate marketing campaigns.
- We will not, as a matter of course, seek your consent when sending marketing messages to a corporate postal or email address.
- We may use your personal data for these purposes if we deem this to be necessary for our legitimate interests. If you would like to know more about what this means, please click [here](#).

- If you are not happy about this, in certain circumstances you have the right to object and can find out more about how and when to do this [here](#).

**To help us to establish, exercise or defend legal claims**

- In more unusual circumstances, we may use your personal data to help us to establish, exercise or defend legal claims.

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- **SUPPLIER DATA:** We will only use your information:
  - To store (and update when necessary) your details on our database, so that we can contact you in relation to our agreements or our dealings with you;
  - To offer services to you or to obtain support and services from you;
  - To perform certain legal and regulatory obligations;
  - Facilitating our payroll and invoicing processes;
  - To help us to target appropriate marketing campaigns; and
  - In more unusual circumstances, to help us to establish, exercise or defend legal claims.
- We may use your personal data for these purposes if we deem this to be necessary for our legitimate interests. If you want to know more about what this means, please click [here](#).
- We will not, as a matter of course, seek your consent when sending marketing messages to a corporate postal or email address.
- If you are not happy about this, in certain circumstances you have the right to object and can find out more about how to do so [here](#).
- Please note that in certain of the jurisdictions in which we operate, we comply with additional local law requirements. For more information, please click [here](#).

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- **JOB APPLICANT DATA:** We generally use job applicant data in the following ways:
  - [Recruitment Activities;](#)
  - [Equal Opportunities Monitoring; and](#)
  - [To help us to establish, exercise or defend legal claims.](#)

Here are some more details about each:

**Recruitment Activities**

- We've listed below various ways in which we may use your personal data for this purpose, where appropriate and in accordance with any local laws and requirements. Please note that this list is not exhaustive.
  - Collecting your data from you and other sources, such as LinkedIn;
  - Storing your details (and updating them when necessary) on our database, so that we can contact you in relation to recruitment;
  - To facilitate the recruitment process;
  - Assessing data about you against vacancies which we think may be suitable for you;
  - Carrying out our obligations arising from any contracts entered into between us;

- Carrying out our obligations arising from any contracts entered into between Genus and third parties in relation to your recruitment;
  - Facilitating our payroll and invoicing processes;
  - Verifying details you have provided, using third party resources (such as psychometric evaluations or skills tests), or to request information (such as references, qualifications and potentially any criminal convictions, to the extent that this is appropriate and in accordance with local laws);
  - Complying with our legal obligations in connection with the detection of crime or the collection of taxes or duties.
- We may use your personal data for the above purposes if we deem it necessary to do so for our legitimate interests. If you want to know more about what this means, please click [here](#). If you are not happy about this, in certain circumstances you have the right to object and can find out more about how and when to do this [here](#).
  - Please note that in certain of the jurisdictions in which we operate, we comply with additional local law requirements. For more information, please click [here](#).

#### **Equal opportunities monitoring and other sensitive personal data**

- We are committed to ensuring that our recruitment processes are aligned with our approach to equal opportunities. Some of the data we may (in appropriate circumstances and in accordance with local law and requirements) collect about you comes under the umbrella of "diversity information". This could be information about your ethnic background, gender, disability, age, sexual orientation, religion or other similar beliefs, and/or social-economic background. Where appropriate and in accordance with local laws and requirements, we will use this information on an anonymised basis to monitor our compliance with our equal opportunities policy.
- This information is what is called 'sensitive' personal data. We therefore need to obtain your explicit consent before we can collect it. We will ask for your consent by offering you an opt-in. This means that you have to explicitly and clearly tell us that you agree to us collecting and using this information.
- We may collect other sensitive personal data about you, such as health-related information, religious affiliation, or details of any criminal convictions if this is appropriate in accordance with local laws and is required for a role that you are interested in applying for. We will never do this without your explicit consent.
- If you would like to find out more about consent, please click [here](#). Please note that in certain of the jurisdictions in which we operate, different rules apply to this sensitive data. For more information, please click [here](#).
- If you are not happy about this, you have the right to withdraw your consent at any time and you can find out how to do so [here](#).

#### **To help us to establish, exercise or defend legal claims**

- In more unusual circumstances, we may use your personal data to help us to establish, exercise or defend legal claims.

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- **PEOPLE WHOSE DATA WE RECEIVE FROM JOB APPLICANTS AND STAFF, SUCH AS REFEREES, EMERGENCY CONTACTS AND DEPENDENTS:** We will only use the information about you for the following purposes:



- If a job applicant or [Employee](#) puts you down on our form as an emergency contact, we will contact you in the case of an accident or emergency affecting them; or
- If you were put down by a job applicant as a referee, we will contact you in order to take up a reference; or
- If you were put down by an [Employee](#) member as a next of kin or dependent, we will store your personal data to ensure the personnel records of the [Employee](#) are correct and disclose your information to the relevant benefits provider.
- We may use your personal data for these purposes if we deem this to be necessary for our legitimate interests. If you would like to find out more about what this means, please click [here](#).
- If you are not happy about this, you have the right to object and can find out more about how to do so [here](#).

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- **WEBSITE USERS:** We use your data to help us to improve your experience of using our website, for example by analysing your recent search criteria to help us to present information to you that we think you will be interested in.
- If you would like to find out more about cookies, including how we use them and what choices are available to you, please click [here](#).

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## WHO DO WE SHARE YOUR PERSONAL DATA WITH?

- Where appropriate and in accordance with local laws and requirements, we may share your personal data, in various ways and for various reasons, with the following categories of people:
  - Any of our group companies or Associated Companies;
  - Individuals and organisations who hold information related to [Job Applicant](#)'s reference or application to work with us, such as current, past or prospective employers, educators and examining bodies and employment and recruitment agencies;
  - Tax, audit, regulatory bodies or other authorities including governmental authorities, when we believe in good faith that the law or other regulation requires us to share this data (for example, because of a request by a tax authority or in connection with any anticipated litigation );
  - Third party service providers (including [Suppliers](#)) who perform functions on our behalf (including benefit providers such as pension providers, private medical insurance, dental insurance and other benefits providers, contractors carrying out research and development, external consultants, business associates and professional advisers such as lawyers, auditors and accountants, transport and distribution suppliers, technical support functions and IT consultants carrying out testing and development work on our business technology systems);
  - Third party outsourced IT and document storage providers where we have an appropriate processing agreement (or similar protections) in place;
  - Marketing technology platforms and suppliers;

- In the case of [Job Applicants](#) and their referees, we may share your personal data with third parties who we have retained to provide services such as reference, qualification and criminal convictions checks, to the extent that these checks are appropriate and in accordance with local laws;
- If Genus merges with or is acquired by another business or company in the future, we may share your personal data with the new owners of the business or company (and provide you with notice of this disclosure).

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### HOW DO WE SAFEGUARD YOUR PERSONAL DATA?

- We are committed to taking all reasonable and appropriate steps to protect the personal information that we hold from misuse, loss, or unauthorised access. We do this by having in place a range of appropriate technical and organisational measures. These include measures to deal with any suspected data breach.
- If you suspect any misuse or loss of or unauthorised access to your personal information please let us know immediately. Details of how to contact us can be found [here](#).

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### HOW LONG DO WE KEEP YOUR PERSONAL DATA FOR?

- Subject to your rights (as explained in this Privacy Policy) we will ordinarily process your data throughout the course of our interactions and will then retain it for a period after we have parted ways. The precise length of time will depend the type of data, our legitimate business needs and other legal or regulatory rules that may require us to retain it for certain minimum periods. For example, we may be required to retain certain data for the purposes of tax reporting or responding to tax queries. We will retain it if it might be relevant to any potential litigation.
- In determining the appropriate retention period for different types of personal data, we always consider the amount, nature, and sensitivity of the personal data in question, the potential risk of harm from unauthorised use or disclosure of that personal data, the purposes for which we need to process it and whether we can achieve those purposes by other means (in addition of course to ensuring that we comply with our legal, regulatory and risk-management obligations, as described above).
- Once we have determined that we no longer need to hold your personal data, we will [Delete](#) it.

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### HOW CAN YOU ACCESS, AMEND OR TAKE BACK THE PERSONAL DATA THAT YOU HAVE GIVEN TO US?

- One of the GDPR's and POPIA's main objectives is to protect and clarify the rights of EU citizens, South African citizens, individuals in South Africa, and individuals in the EU with regards to data privacy. This means that you retain various rights in respect of your data, even once you have given it to us. These are described in more detail below.
- To get in touch about these rights, please [contact us](#). We will seek to deal with your request without undue delay, and in any event within one month (subject to any extensions to which we are lawfully entitled). Please note that we may keep a record of your communications to help us resolve any issues which you raise.

- **Right to object:** this right enables you to object to us processing your personal data where we do so for one of the following four reasons: (i) our [legitimate interests](#); (ii) to enable us to perform a task in the public interest or exercise official authority; (iii) to send you direct marketing materials; and (iv) for scientific, historical, research, or statistical purposes.
- The "legitimate interests" and "direct marketing" categories above are the ones most likely to apply. If your objection relates to us processing your personal data because we deem it necessary for your legitimate interests, we must act on your objection by ceasing the activity in question unless:
  - we can show that we have compelling legitimate grounds for processing which overrides your interests; or
  - we are processing your data for the establishment, exercise or defence of a legal claim.
- If your objection relates to direct marketing, we must act on your objection by ceasing this activity.
- **Right to withdraw consent:** Where we have obtained your consent to process your personal data for certain activities (for example, for our marketing arrangements), you may withdraw this consent at any time and we will cease to carry out the particular activity that you previously consented to unless we consider that there is an alternative reason to justify our continued processing of your data for this purpose in which case we will inform you of this condition.
- **Data Subject Access Requests (DSAR):** You may ask us to confirm what information we hold about you at any time, and request us to modify, update or delete such information. We may ask you to verify your identity and for more information about your request. If we provide you with access to the information we hold about you, we will not charge you for this unless your request is "manifestly unfounded or excessive". If you request further copies of this information from us, we may charge you a reasonable administrative cost where legally permissible. Where we are legally permitted to do so, we may refuse your request. If we refuse your request we will always tell you the reasons for doing so.
- Please note that in certain of the jurisdictions in which we operate, we comply with additional local law requirements regarding data subject access requests and may refuse your request in accordance with such laws. For more information, please click [here](#).
- **Right to erasure:** You have the right to request that we erase your personal data in certain circumstances. Normally, the information must meet one of the following criteria:
  - the data are no longer necessary for the purpose for which we originally collected and/or processed them;
  - where previously given, you have withdrawn your consent to us processing your data, and there is no other valid reason for us to continue processing;
  - the data has been processed unlawfully (i.e. in a manner which does not comply with the GDPR);
  - it is necessary for the data to be erased in order for us to comply with our legal obligations as a data controller; or
  - if we process the data because we believe it necessary to do so for our legitimate interests, you object to the processing and we are unable to demonstrate overriding legitimate grounds for our continued processing.

- Please note that in certain of the jurisdictions in which we operate, we comply with additional local law requirements regarding data subject right to erasure and may refuse your request in accordance with local laws. For more information, please click [here](#).
- We would only be entitled to refuse to comply with your request for erasure for one of the following reasons:
  - to exercise the right of freedom of expression and information;
  - to comply with legal obligations or for the performance of a public interest task or exercise of official authority;
  - for public health reasons in the public interest;
  - for archival, research or statistical purposes; or
  - to exercise or defend a legal claim.
- When complying with a valid request for the erasure of data we will take all reasonably practicable steps to [Delete](#) the relevant data.
- **Right to restrict processing:** You have the right to request that we restrict our processing of your personal data in certain circumstances. This means that we can only continue to store your data and will not be able to carry out any further processing activities with it until either: (i) one of the circumstances listed below is resolved; (ii) you consent; or (iii) further processing is necessary for either the establishment, exercise or defence of legal claims, the protection of the rights of another individual, or reasons of important EU or Member State public interest.
- The circumstances in which you are entitled to request that we restrict the processing of your personal data are:
  - Where you dispute the accuracy of the personal data that we are processing about you. In this case, our processing of your personal data will be restricted for the period during which the accuracy of the data is verified;
  - Where you object to our processing of your personal data for our legitimate interests. Here, you can request that the data be restricted while we verify our grounds for processing your personal data;
  - Where our processing of your data is unlawful, but you would prefer us to restrict our processing of it rather than erasing it; and
  - Where we have no further need to process your personal data but you require the data to establish, exercise, or defend legal claims.
- If we have shared your personal data with third parties, we will notify them about the restricted processing unless this is impossible or involves disproportionate effort. We will, of course, notify you before lifting any restriction on processing your personal data.
- **Right to rectification:** You also have the right to request that we rectify any inaccurate or incomplete personal data that we hold about you. If we have shared this personal data with third parties, we will notify them about the rectification unless this is impossible or involves disproportionate effort. Where appropriate, we will also tell you which third parties we have disclosed the inaccurate or incomplete personal data to. Where we think that it is reasonable for us not to comply with your request, we will explain our reasons for this decision.
- **Right of data portability:** If you wish, you have the right to transfer your personal data between data controllers. To allow you to do so, we will provide you with your data in a

commonly used machine-readable format that is password-protected so that you can transfer the data to another online platform. Alternatively, we may directly transfer the data for you. This right of data portability applies to: (i) personal data that we process automatically (i.e. without any human intervention); (ii) personal data provided by you; and (iii) personal data that we process based on your consent or in order to fulfil a contract.

- **Right to lodge a complaint with a supervisory authority:** You also have the right to lodge a complaint with your local supervisory authority. Details of how to contact them can be found [here](#).
- If you would like to exercise any of these rights, or withdraw your consent to the processing of your personal data (where consent is our legal basis for processing your personal data), details of how to contact us can be found [here](#). Please note that we may keep a record of your communications to help us resolve any issues which you raise.
- You may ask to unsubscribe from direct marketing at any time. Details of how to do so can be found [here](#).
- It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during the period for which we hold your data.

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#### WHO IS RESPONSIBLE FOR PROCESSING YOUR PERSONAL DATA ON THE GENUS WEBSITE?

- You can find out which Genus entity is responsible for processing your personal data and where it is located by following this [link](#).
- If you have any comments or suggestions concerning this Privacy Policy please follow this [link](#).

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#### HOW DO WE STORE AND TRANSFER YOUR DATA INTERNATIONALLY?

- In order to provide you with the best service and to carry out the [purposes](#) described in this Privacy Policy, your data may be transferred:
  - between and within entities within our Genus group of companies and Associated Companies;
  - to third parties (such as regulatory authorities, advisers or other suppliers to the Genus business);
  - to overseas [Customers](#) and/or [Distributors](#);
  - to [Customers](#) and/or [Distributors](#) within your country who may, in turn, transfer your data internationally;
  - to a cloud-based storage provider; and
  - to other third parties, as referred to [here](#).
- We want to make sure that your data are stored and transferred in a way which is secure. We will therefore only transfer data outside of the European Economic Area or EEA (i.e. the Member States of the European Union, together with Norway, Iceland and Liechtenstein) where it is compliant with data protection legislation and the means of transfer provides adequate safeguards in relation to your data, for example:

- by way of data transfer agreement, incorporating the current standard contractual clauses adopted by the European Commission for the transfer of personal data by data controllers in the EEA to data controllers and processors in jurisdictions without adequate data protection laws; or
  - by signing up to the EU-U.S. Privacy Shield Framework for the transfer of personal data from entities in the EU to entities in the United States of America or any equivalent agreement in respect of other jurisdictions; or
  - transferring your data to a country where there has been a finding of adequacy by the European Commission in respect of that country's levels of data protection via its legislation; or
  - where it is necessary for the conclusion or performance of a contract between ourselves and a third party and the transfer is in your interests for the purposes of that contract (for example, if we need to transfer data outside the EEA in order to meet our obligations under that contract if you are a customer of ours); or
  - where you have consented to the data transfer.
- To ensure that your personal information receives an adequate level of protection, we have put in place appropriate procedures with the third parties we share your personal data with to ensure that your personal information is treated by those third parties in a way that is consistent with and which respects the law on data protection.

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## COOKIES POLICY

### What's a cookie?

- A "cookie" is a piece of information that is stored on your computer's hard drive and which records your navigation of a website so that, when you revisit that website, it can present tailored options based on the information stored about your last visit. Cookies can also be used to analyse traffic and for advertising and marketing purposes.
- Cookies are used by nearly all websites and do not harm your system. If you want to check or change what types of cookies you accept, this can usually be altered within your browser settings.

### How do we use cookies?

- We use cookies to track your use of our website(s). This enables us to understand how you use the site and track any patterns that emerge individually or from larger groups. This helps us to develop and improve our website(s) and services in response to what our visitors want and need.
- Cookies are either:
  - Session cookies: these are only stored on your computer during your web session and are automatically deleted when you close your browser – they usually store an anonymous session ID allowing you to browse a website without having to log in to each page but they do not collect any information from your computer; or
  - Persistent cookies: a persistent cookie is stored as a file on your computer and it remains there when you close your web browser. The cookie can be read by the website that created it when you visit that website again. We use persistent cookies for Google Analytics and for personalisation (see below).

- Cookies can also be categorised as follows:
  - **Strictly necessary cookies:** These cookies are essential to enable you to use the site effectively, such as when applying for a job, and therefore cannot be turned off. Without these cookies, the services available to you on our site cannot be provided. These cookies do not gather information about you that could be used for marketing or remembering where you have been on the internet.
  - **Performance cookies:** These cookies enable us to monitor and improve the performance of our site. For example, they allow us to count visits, identify traffic sources and see which parts of the site are most popular.
  - **Functionality cookies:** These cookies allow our website to remember choices you make (such as your user name, language or the region you are in) and provide enhanced features. For instance, we may be able to provide you with news or updates relevant to the services you use. These cookies can also be used to remember changes you have made to text size, font and other parts of web pages that you can customise. They may also be used to provide services you have requested such as viewing a video or commenting on a blog. The information these cookies collect is usually anonymised.
  - **Personalisation cookies:** These cookies help us to advertise details of potential services that we think may be of interest. These cookies are persistent (for as long as you are registered with us) and mean that when you log in or return to the website, you may see advertising for services that are similar to services that you have previously browsed.

The table at [Annex 4](#) lists the cookies we use in your jurisdiction, why we use them and what types of cookies they are.

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## OUR LEGAL BASES FOR PROCESSING YOUR DATA

### LEGITIMATE INTERESTS

- Article 6(1)(f) of the GDPR says that we can process your data where it "*is necessary for the purposes of the legitimate interests pursued by [us] or by a third party, except where such interests are overridden by the interests or fundamental rights or freedoms of [you] which require protection of personal data.*"
- You have the right to object to us processing your personal data on this basis. If you would like to know more about how to do so, please click [here](#).
- Please note that in certain of the jurisdictions in which we operate, a different legal basis for data processing might apply in certain cases. For more information, please click [here](#).

### **CUSTOMER AND DISTRIBUTOR DATA:**

- To ensure the effectively provision of our goods, services, [Genetics](#) and/or [Genetic Products](#), we use and store the personal data of individual contacts at your organisation as well as keeping records of our communications and meetings.
- We also use and store the personal data of individuals contacts at your organisation in order ensure compliance with the terms of our agreements with [Customers](#) and/or



[Distributors](#) (as applicable), as well as ensuring the confidentiality and protection of our proprietary confidential information and trade secrets;

- We want to provide you with relevant marketing materials which we believe you are interested in. We therefore think it's reasonable for us to process your data to make sure that we send you the most appropriate content.
- We think this is reasonable – we deem these uses of your data to be necessary for our legitimate interests as a biotechnology business.
- We have to make sure our business runs smoothly, so that we can carry on providing our goods, services, [Genetics](#) and/or [Genetic Products](#). We therefore also need to use your data for our internal administrative activities, such as invoicing where relevant.
- We have our own obligations under the law, which it is a legitimate interest of ours to insist on meeting. If we believe in good faith that it is necessary, we may therefore share your data in connection with crime detection or tax collection.
- **SUPPLIER DATA:**
  - We use and store the personal data of individuals within your organisation in order to facilitate the receipt of services from you as one of our [Suppliers](#). We also hold your financial details, so that we can pay you for your services.
  - We deem all such activities to be necessary within the range of our legitimate interests as a recipient of your services.
  - In respect of executive agencies and other authorities, we use and store the personal data of individuals within your organisation in order to facilitate the provision of our goods, services, [Genetics](#) and/or [Genetic Products](#) to our [Customers](#) and/or [Distributors](#). We believe we have a legitimate interest to do so as a biotechnology business.
- **JOB APPLICANT DATA:**
  - We think it's reasonable to expect that if you are looking for employment or have provided your CV or application form, you are happy for us to collect and otherwise use your personal data to engage in a recruitment exercise, consider whether to offer employment to you and double check any information you have given us (such as the results from psychometric evaluations or skills tests) or to confirm your references, qualifications and criminal record, to the extent that this is appropriate and in accordance with local laws. We need to do these things so that we can carry out and appoint the best applicants to join Genus.
- **PEOPLE WHOSE DATA WE RECEIVE FROM JOB APPLICANTS AND STAFF, SUCH AS REFEREES AND EMERGENCY CONTACTS:**
  - If you have been put down by a [Job applicant](#) or a Genus [Employee](#) as one of their referees, we use your personal data in order to contact you for a reference. This is to be necessary for our legitimate interests as an organisation to ensure we appoint the best applicants to join Genus.
  - If an [Employee](#) has given us your details as an emergency contact, we will use these details to contact you in the case of an accident or emergency. We have a legitimate interest to store this data and use it in appropriate circumstances on behalf of an [Employee](#).
  - If an [Employee](#) has given us your details as a dependent or a next of kin, we will use your personal data as appropriate for the purpose of benefits (e.g. death in service, privacy medical insurance or childcare funding) or employment rights (e.g. maternity or paternity



leave or a flexible working request). We have a legitimate interest to store this data and use it in appropriate circumstances on behalf of our [Employees](#).

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## CONSENT

- In certain circumstances, we are required to obtain your consent to the processing of your personal data in relation to certain activities. Depending on exactly what we are doing with your information, this consent will be opt-in consent or soft opt-in consent.
- Article 4(11) of the GDPR states that (opt-in) consent is "*any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.*" In plain language, this means that:
  - you have to give us your consent freely, without us putting you under any type of pressure;
  - you have to know what you are consenting to – so we'll make sure we give you enough information;
  - you should have control over which processing activities you consent to and which you do not. We provide these finer controls within our privacy preference centre; and
  - you need to take positive and affirmative action in giving us your consent – we're likely to provide a tick box for you to check so that this requirement is met in a clear and unambiguous fashion.
  - we will keep records of the consents that you have given in this way.
- In some cases, we will be able to rely on soft opt-in consent. We are allowed to market products or services to you which are related to the services we provide as long as you do not actively opt-out from these communications.
- Please note that in certain of the jurisdictions in which we operate, we comply with additional local law requirements regarding consenting to receive marketing materials. For more information, please click [here](#).
- As we have mentioned, you have the right to withdraw your consent to these activities. You can do so at any time, and details of how to do so can be found [here](#).

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## LEGAL OBLIGATIONS

- We also have legal and regulatory obligations that we need to comply with. Article (6)(1)(c) of the GDPR states that we can process your personal data where this processing "*is necessary for compliance with a legal obligation to which [we] are subject*".
- If we believe in good faith that it is necessary, we may share your data in connection with crime detection or tax collection.
- We also may share your data with executive agencies or other relevant bodies in order to comply with our regulatory obligations.
- We will keep records of your personal data in accordance with our legal and regulatory obligations.

## ESTABLISHING, EXERCISING OR DEFENDING LEGAL CLAIMS

- Sometimes it may be necessary for us to process personal data and, where appropriate and in accordance with local laws and requirements, sensitive personal data in connection with exercising or defending legal claims. Article 9(2)(f) of the GDPR allows this where the processing "*is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity*".
- This may arise for example where we need to take legal advice in relation to legal proceedings or are required by law to preserve or disclose certain information as part of the legal process.

## ANNEX 1 – HOW TO CONTACT US

Country in which you use Genus goods and/or services or supply Genus with good and/or services	Genus entity with whom you contract for Genus goods and/or services or to whom you supply with good and/or services	<b>How you can get in touch with us:</b> <ul style="list-style-type: none"> <li>• to access, amend or take back the personal data that you have given to us;</li> <li>• if you suspect any misuse or loss of or unauthorised access to your personal information;</li> <li>• to withdraw your consent to the processing of your personal data (where consent is the legal basis on which we process your personal data);</li> <li>• with any comments or suggestions concerning this Privacy Policy</li> </ul>
UK	Genus plc	Genus, Matrix House, Basing View, Basingstoke, RG21 4DZ Email: <a href="mailto:dataprivacy@genusplc.com">dataprivacy@genusplc.com</a>
UK	Genus Breeding Limited	Genus Breeding Limited, Genus Breeding Limited, Alpha Building, London Road, Nantwich, CW5 7JW Email: <a href="mailto:dataprivacy@genusplc.com">dataprivacy@genusplc.com</a>
UK	Pig Improvement Company UK Limited	Genus, Matrix House, Basing View, Basingstoke, RG21 4DZ Email: <a href="mailto:dataprivacy@genusplc.com">dataprivacy@genusplc.com</a>

<b>UK</b>	Inimex Genetics Limited	Genus, Matrix House, Basing View, Basingstoke, RG21 4DZ Email: <a href="mailto:dataprivacy@genusplc.com">dataprivacy@genusplc.com</a>
<b>UK</b>	Promar International Limited	Genus plc, Matrix House, Basing View, Basingstoke, RG21 4DZ Email: <a href="mailto:dataprivacy@genusplc.com">dataprivacy@genusplc.com</a>
<b>UK</b>	PIC Fyfield Limited	Genus plc, Matrix House, Basing View, Basingstoke, RG21 4DZ Email: <a href="mailto:dataprivacy@genusplc.com">dataprivacy@genusplc.com</a>
<b>UK</b>	Dalgety Pension Trust	Genus plc, Matrix House, Basing View, Basingstoke, RG21 4DZ Email: <a href="mailto:dataprivacy@genusplc.com">dataprivacy@genusplc.com</a>
<b>UK</b>	Spillers Limited	Genus plc, Matrix House, Basing View, Basingstoke, RG21 4DZ Email: <a href="mailto:dataprivacy@genusplc.com">dataprivacy@genusplc.com</a>
<b>UK</b>	Genus Quest Trustees Limited	Genus plc, Matrix House, Basing View, Basingstoke, RG21 4DZ Email: <a href="mailto:dataprivacy@genusplc.com">dataprivacy@genusplc.com</a>
<b>UK</b>	Genus Trustees Limited	Genus plc, Matrix House, Basing View, Basingstoke, RG21 4DZ Email: <a href="mailto:dataprivacy@genusplc.com">dataprivacy@genusplc.com</a>
<b>Germany</b>	Pig Improvement Company	JathostraÙe 11 A, 30163 Hanover, Germany Email: <a href="mailto:dataprivacy@genusplc.com">dataprivacy@genusplc.com</a>

	Deutschland GmbH	
<b>France</b>	PIC France S.A.	69 Chemin des Molières, PA du Charpenay, 69210 LENTILLY, France. Email: <a href="mailto:dataprivacy@genusplc.com">dataprivacy@genusplc.com</a>
<b>France</b>	BOVEC SAS	69, Chemin des Molières - PA du Charpenay - 69210 Lentilly, France Email: <a href="mailto:dataprivacy@genusplc.com">dataprivacy@genusplc.com</a>
<b>South Africa</b>	ABS GENETICS SOUTH AFRICA PROPRIETARY LIMITED	EMEA HR Operations Prestige Park Block B Unit NO 5B Pastoral Street Durbanville Industrial Park Western Cape 7550  Email: <a href="mailto:emea-hr@operations@genusplc.com">emea-hr@operations@genusplc.com</a>  Please also address any concerns, queries or any other comments to your Information Officer: Serena Lombaard, at <a href="mailto:serena.lombaard@genusplc.com">serena.lombaard@genusplc.com</a>
<b>Spain</b>	Pig Improvement Company España S.A	San Cugat del Vallès (Barcelona), C/Paul Villa, 22 2o puerta 6 Email: <a href="mailto:dataprivacy@genusplc.com">dataprivacy@genusplc.com</a>

<b>Poland</b>	PIC POLSKA Sp. z o. O	Warsaw, at ul. Wazów 8A Email: <a href="mailto:dataprivacy@genusplc.com">dataprivacy@genusplc.com</a>
<b>Romania</b>	S.C PIC România S.R.L.	București, Caimatei Street 8, Sector 2 Email: <a href="mailto:dataprivacy@genusplc.com">dataprivacy@genusplc.com</a>
<b>Italy</b>	PIC Italia srl	strada dei loggi 22, 06135, Perugia Italy Email: <a href="mailto:dataprivacy@genusplc.com">dataprivacy@genusplc.com</a>
<b>Italy</b>	ABS Italia s.r.l.	Via Bastida 6 - Loc. Cavatigozzi 26020 Cremona – Italy Email: <a href="mailto:dataprivacy@genusplc.com">dataprivacy@genusplc.com</a>

## ANNEX 2 – HOW TO CONTACT YOUR LOCAL SUPERVISORY AUTHORITY

<b>Country in which you use Genus services or supply Genus with services</b>	<b>Details of your local supervisory authority</b>
<b>UK</b>	<p>The Information Commissioner's Office. You can contact them in the following ways:</p> <ul style="list-style-type: none"> <li>• Phone: 0303 123 1113</li> <li>• Email: <a href="mailto:casework@ico.org.uk">casework@ico.org.uk</a></li> <li>• <a href="#">Live chat.</a></li> </ul>

	<ul style="list-style-type: none"> <li>• Post: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF</li> </ul>
<p><b>Germany</b></p>	<p>The data protection supervisory authority responsible for our entities in Hanover is the Data Protection Commissioner for the State of Lower Saxony:</p> <ul style="list-style-type: none"> <li>• Phone: +49 (0511) 120 45 00</li> <li>• Fax: +49 (0511) 120 45 99</li> <li>• E-mail: <a href="mailto:poststelle@lfd.niedersachsen.de">poststelle@lfd.niedersachsen.de</a></li> <li>• Post: Die Landesbeauftragte für den Datenschutz Niedersachsen Prinzenstraße 5 30159 Hannover</li> </ul> <p>The data protection supervisory authority responsible for our entities in Schleswig-Holstein is the Data Protection Commissioner for Schleswig-Holstein</p> <ul style="list-style-type: none"> <li>• Unabhängiges Landeszentrum für Datenschutz Schleswig-Holstein</li> <li>• Phone: 04 31/988-1200</li> <li>• Fax: 04 31/988-1223</li> <li>• E-Mail: <a href="mailto:mail@datenschutzzentrum.de">mail@datenschutzzentrum.de</a></li> <li>• Post: Postfach 71 16 24171 Kiel</li> </ul> <p>or</p> <p>Holstenstraße 98</p>

	24103 Kiel
<b>France</b>	<p><b>The Commission Nationale de L'informatique et des Libertés.</b> You can contact them in the following ways:</p> <ul style="list-style-type: none"> <li>• Phone: 01 53 73 22 22</li> <li>• Post: 3 Place de Fontenoy TSA 80715 75334 Paris CEDEX 07</li> <li>• Fax: 01 53 73 22 00</li> </ul>
<b>Italy</b>	<p><b>Garante per la protezione dei dati personali.</b> You can contact them in the following ways:</p> <ul style="list-style-type: none"> <li>• Phone: (+39) 06.69677.2917</li> <li>• Email: <a href="mailto:garante@gpdp.it">garante@gpdp.it</a></li> <li>• Certified email: protocollo@pec.gpdp.it</li> <li>• Post: Piazza di Monte Citorio n. 121  00186  ROMA</li> <li>• Fax: (+39) 06.69677.3785</li> </ul>
<b>Poland</b>	<p>Currently, <b>Biuro Generalnego Inspektora Ochrony Danych Osobowych</b> (after the amendments: <b>Urząd Ochrony Danych Osobowych</b>). You can contact them in the following ways:</p>



	<ul style="list-style-type: none"> <li>• Phone: +48 22 531 03 00</li> <li>• Post: ul. Stawki 2, 00-193 Warsaw</li> <li>• Email: <a href="mailto:kancelaria@giodo.gov.pl">kancelaria@giodo.gov.pl</a></li> <li>• Fax: +48 22 531 03 01</li> </ul>
<b>South Africa</b>	<p><b>The Information Regulator</b></p> <p>Office Address:</p> <p>JD House 27 Stiemens Street Braamfontein Johannesburg, Gauteng 2001 Republic of South Africa</p> <p>Postal Address:</p> <p>P.O Box 31533, Braamfontein, Johannesburg 2017</p> <p>To lodge a complaint: <a href="mailto:complaints.IR@justice.gov.za">complaints.IR@justice.gov.za</a> To make a general enquiry: <a href="mailto:inforeg@justice.gov.za">inforeg@justice.gov.za</a></p>
<b>Spain</b>	<p><b>Agencia Española de Protección de Datos.</b> You can contact them in the following ways:</p> <ul style="list-style-type: none"> <li>• Phone: +34 912 663 517</li> <li>• Post: C/ Jorge Juan, 6. 28001 - Madrid (Spain)</li> </ul>

**Romania**

**The National Supervisory Authority For Personal Data Processing.** You can contact them in the following ways:

- Address: Bucharest, Romania, 28-30 G-ral Gheorghe Magheru Bld., District 1, post code 010336
- E-mail: [anspdc@dataprotection.ro](mailto:anspdc@dataprotection.ro)
- Phone: +40.318.059.211
- Fax: +40.318.059.602

**ANNEX 3 – COUNTRY-SPECIFIC VARIATIONS TO OUR PRIVACY POLICY**

<b>PRIVACY POLICY TOPIC</b>	<b>JURISDICTION</b>	<b>COUNTRY-SPECIFIC LEGAL REQUIREMENT</b>
<p><b>YOUR RIGHTS IN RELATION TO THE DATA WE HOLD ON YOU</b></p> <p><b>HOW WE PROCESS YOUR SENSITIVE PERSONAL DATA</b></p>	<p><b>UK</b></p>	<p>Where your personal data are processed in accordance with the fair processing condition relating to our rights and obligations under employment and social security law, this relates to our processing of your personal data which is necessary for compliance with legal obligations (such as ensuring that we pay you statutory sick pay, comply with the statutory employment protections that you enjoy, comply with health and safety laws, and ensure that appropriate National Insurance contributions are made).</p>

**ANNEX 3 – COUNTRY-SPECIFIC VARIATIONS TO OUR PRIVACY POLICY**

<b>PRIVACY POLICY TOPIC</b> (references refer to those contained under the ‘Long Form’ heading)	<b>JURISDICTION</b>	<b>COUNTRY-SPECIFIC LEGAL REQUIREMENT</b>
	<b>SOUTH AFRICA</b>	In order to comply with South Africa’s data protection legislation, the following amendments are to be made to the following clauses.
<b>Introduction</b>		<p><i>Bullet point one, to include the following wording highlighted in yellow:</i></p> <p>It describes how we collect, use and process your personal data, and how, in doing so, we comply with our legal obligations to you. Your privacy is important to us, and we are committed to protecting and safeguarding your data privacy rights as a <b>data subject</b>.</p>
<b>Long Form: What kind of personal data do we collect?</b>		<p><i>Addition of the following prior to the sentence “the information described below is in addition to any personal data we are required by law to process in any given situation”:</i></p> <p>For the purposes of this Privacy Policy, Personal Data shall have the same meaning as Personal Information as defined by POPIA, and Sensitive Personal Data shall have the same meaning as Special Personal Information as defined by POPIA.</p> <p><i>Addition of the following bullet points after the table setting out Personal Data:</i></p>

		<p>Personal Data concerning your religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life or biometric information, or your criminal behaviour (if any) shall be regarded as “<b>Sensitive Personal Data</b>”.</p> <p>We will not process your Sensitive Personal Data unless (i) we have obtained your consent, (ii) the processing is necessary for the establishment, exercise or defence of a right or obligation in law, (iii) the processing is necessary to comply with an obligation of international public law, (iv) the processing is for historical, statistical or research purposes to the extent that the purpose serves a public interest or it appears to be impossible or would involve a disproportionate effort to ask for consent and sufficient guarantees are provided that the processing does not adversely affect your individual privacy to a disproportionate extent, (v) the information has deliberately been made public by you, or (vi) special conditions are present for which we may process your Special Personal Data as provided for in POPIA.</p>
<p><b>How do we collect your Personal Data?</b></p>		<p><i>Addition of the following prior to the sentence “there are three main ways in which we collect your personal data...”:</i></p> <p>We will always collect your Personal Data directly from you, unless (i) the Personal Data is derived from a public record or has been made public by you, (ii) you have consented to the collection of the Personal Data from another source, (iii) collection of the Personal Data from another source would not prejudice your legitimate interests, (iv) collection from another source is necessary to avoid prejudice to the maintenance of the law by any public body, to comply with an obligation imposed by law concerning the collection of revenue as defined in section 1 of the South African Revenue Service Act 34 of 1997, (v) collection of the Personal Data from you would prejudice a lawful purpose of the collection, or (vi) collection of the Personal Data from you would not be reasonably practicable in the circumstances.</p> <p>In the event that we collect your Personal Data from another source, we will ensure that you</p>

		are aware of the source from which your Personal Data has been collected.
<b>How do we use your Personal Data?</b>		<p><i>Addition of the following prior to the bullet pointed list:</i></p> <p>We will only process such Personal Data as is adequate, relevant and not excessive for the below identified purposes.</p>
<b>Who do we share your Personal Data with?</b>		<p><i>Including the following wording, as highlighted in yellow:</i></p> <p>Where appropriate and in accordance with local laws and requirements, we may share your Personal Data, in various ways and for various reasons, with the following categories of people ("<b>Operators</b>"). We will ensure, by way of a written contract, that all Operators secure the integrity and confidentiality of Personal Data in its possession or under its control by taking appropriate, reasonable technical and organisational measures to prevent the loss of, damage to or unauthorised destruction of or unlawful access to Personal Data. We will further ensure that Operators are legally bound to notify us immediately where there are reasonable grounds to believe that your Personal Data has been accessed or acquired by an unauthorised person.</p>

<p><b>How do we safeguard your Personal Data?</b></p>		<p><i>Addition of the following as bullet points:</i></p> <ul style="list-style-type: none"> <li>• We will take all reasonably practicable steps to ensure that the Personal Data we process is complete, accurate, not misleading and updated where necessary, having regard to the purpose for which the Personal Data has been collected or further processed.</li> <li>• Where there are reasonable grounds to believe that your Personal Data has been accessed or acquired by any unauthorised person, we will, as soon as reasonably possible after the discovery of the compromise, notify the Information Regulator and you in writing (the "<b>Breach Notification</b>").</li> <li>• The Breach Notification shall provide sufficient information to allow you to take protective measures against the potential consequences of the compromise.</li> </ul>
<p><b>How can you access, amend or take back the Personal Data that you have given to us?</b></p>		<p><i>Addition of the following at the end of the section:</i></p> <p>All requests for access under this Privacy Policy are to be made in the prescribed form in terms of section 18 and 53 of the Promotion of Access to Information Act 2 of 2000.</p>

## ANNEX 4 – COOKIES LIST

Type of cookie	Cookie name	Purpose of the cookie	Default expiration time/Duration of Cookie
Custom cookies	ASP.NET_SessionId	Used to store a unique identifier for session.	*
	Genus_cookie	Used when user accepts cookie policy.	1 year
Verification cookie	RequestVerificationToken	Used for verification, after user submits email address and name.	*
Google.com	_ga	Used to distinguish users to calculate visitor, session and campaign data.	2 years
	SSID	Google uses these cookies to improve your user experience.	2 years
Google	SID		2 years
Google	NID		6 months
Google	HSID		2 years
Google	APISID		2 years
Google	SAPISID		2 years
Google	SIDCC		3 month
Google	1P_JAR		These cookies are set via embedded
Umbraco CMS**	UMB_UCONTEXT	This cookie is set by websites using the Umbraco CMS. It is necessary for CMS and is usually only seen by site administrators accessing the back end of the website, rather than general visitors.	End of session
	XSRF-TOKEN	Used for preventing Cross-site request forgery attacks.	*
	XSRF-V		*
		_utma	Used to distinguish users and sessions. The cookie is created when the javascript library executes and no existing __utma cookies exists. The cookie is updated every time data is sent to Google Analytics.
Umbraco.org	__cfduid	Cookie is set by the CloudFlare service to identify trusted web traffic. It does not correspond to any user id in the web application, nor does the cookie store any personally identifiable information	1 years
Umbraco.tv**	ARRAffinity		*
	WAWebSiteSID		



**\* For session cookies Chrome Dev Tools shows expiration date which actually doesn't play any role (eg 1969-12-31). They last until end of session.**

**\*\*Visible only from back-office of the CMS.**

## GLOSSARY

- **Associated Company** – means any entity which directly or indirectly owns or controls or is directly or indirectly owned and controlled by or in common ownership or control with Genus plc to the extent of holding more than 50% of the shares or stock having the power to vote at a general meeting or equivalent.
- **Customers** - includes any organisation which purchases or licences or intends to purchase or licence our goods, services, Genetics and/or Genetic Product on behalf of itself, another organisation or collectively on behalf of a group, any organisation on behalf of whom our goods, services, Genetics and/or Genetic Product have been or are intended to be purchased, or any end client who purchases or licences, or intends to purchase or licence, our goods, services, Genetics and/or Genetic Product from a Distributor.
- **Distributors** – any organisation which has licenced or intends to licence from Genus to produce and sell Genetic Product.
- **Delete** – it is virtually impossible to guarantee the permanent and irretrievable deletion of electronic data. In addition, as we have explained to you in this Privacy Policy, sometimes we may be obliged by law or regulation, or need for risk-management reasons, to retain the ability to access certain elements of personal data. However, our commitment to you is that once your personal data reaches the end of its nominal retention period, or where we receive a valid request from you to erase it, we will put in place specific operational and [Systems](#) measures to ensure that your data is "put beyond use". By this we mean that while the data will still technically exist on an archive system, we will ensure that it cannot be accessed by any of our operational [Systems](#), processes or [Staff](#). Only a very small number of senior [Staff](#), in very limited and carefully prescribed situations, be able to restore your personal data so that it can be viewed for those legitimate purposes. Once we are clear that all relevant legally mandated retention periods have expired, we will go the additional final step of undertaking a "hard delete", whereby not even that very limited number of senior [Staff](#) would be able to restore your personal data.
- **Employee** – includes all current and former employees with continuous employment, all self-employed, occasional workers, Non-Executive Directors, contractors, agency temps, apprentices, graduates or individuals carrying out work experience. For illustrative purposes, if an individual is granted access to the Genus Intranet (Helix), they will be covered by the terms of the Employee Privacy Policy. Independent contractors or consultants performing services for Genus fall within the definition of a "Supplier" for the purposes of this External Privacy Policy.
- **General Data Protection Regulation (GDPR)** – a European Union statutory instrument which aims to harmonise European data protection laws. It has an effective date of 25 May 2018, and any references to it should be construed accordingly to include any national legislation implementing it.
- **Genetics** –means any animals or derivatives thereof, including, without limitation, cells, genetic materials, DNA, RNA, proteins, and semen provided and all genetic material contained within any of them (or any part of them), including (a) any DNA, RNA, protein or other molecular or hereditary materials in or derived from the semen or animals (any replication or immaterial modification thereof) or their progeny; and (b) any product, tissue sample, blood sample or other sample derived from the animals, semen or their progeny.
- **Genetic Product** - means any animal, embryo or semen created using Genetics or any other Genetic Product.

- **Job Applicants** - includes applicants for all roles advertised or promoted by Genus, including permanent, part-time and temporary positions [and freelance roles] with Genus as well as people who have supplied a speculative CV to Genus not in relation to a specific job.
- **Other people whose personal data Genus may process** – these may include Genus [Employee](#) emergency contacts and next of kin, referees and dependents for the purpose of benefits (e.g. privacy medical insurance or childcare funding). It also includes referees provided by Job Applicants.
- **Suppliers** – includes partnerships, companies (including sole traders), third party service providers (including benefit providers, administrators and transportation providers) and atypical workers such as independent contractors and freelance workers, who provide services to Genus. This category also includes contractors (such as those who undertake general research and development for Genus), the Animal and Plant Health Agency and the Department of for Environment, Food and Rural Affairs.
- **Website Users** - any individual who accesses any of the Genus website(s)