

1. WE CARE ABOUT YOUR PRIVACY

We care about protecting and respecting your privacy. In order to serve you better and provide you with the best customer experience, we need to collect some personal data about you.

This Privacy Policy will help you understand how we collect and use your personal data, who we share your personal data with, and how you can control the way your personal data is collected and used by us.

If you access or use our website (<https://www.vertliner.com/assess>) (which we will refer to as “**Site**” in this Privacy Policy) or mobile application (“**App**”), or register to create an account (“**User Account**”) to use the Site or App, then this Privacy Policy will apply to you.

Sometimes, we may send you a new notice to explain how we may use your personal data in specific situations, and will always give you the choice to opt out of such uses.

2. WHO ARE WE?

The Dairy Farm Company, Limited (“**DF**”, “**we**”, “**us**”, “**our**”) operates the Site and the App, and is the data controller. Personal data we collect about you will be used in line with this Privacy Policy.

3. HOW DO WE COLLECT DATA?

Your personal data will be provided by you, collected by us or our indirect or direct subsidiaries or affiliates (“**Vertliner**”), or captured automatically when you access or use our Site or App. For example, we collect your personal data when you create a User Account, browse or make purchases through the Site and/or App, and when you send us emails, or when you browse our Site.

4. ARE YOU OVER 18?

If you are under the age of 18, you must obtain your parent or guardian’s consent to use our Site or App, or apply for a User Account.

5. WHAT INFORMATION DO WE COLLECT ABOUT YOU?

It may be necessary for you to provide us with certain personal data in order for you to use our Site or App. We will let you know when such data is essential. All other personal data is up to you to provide or not, as you prefer.

(a) Your User Account

- If you register for a User Account to use our Site or App, some of the personal data we may collect about you includes: your mobile phone number, which we will use to send authentication codes via SMS to verify your identity;
- your full name, gender, month and year of birth, education history, marital status, email address, telephone number. This information helps us provide you with better

personalized recommendations for products and promotions, but is not mandatory. You may choose not to provide this information to us. Doing so will not affect the basic functions of the Site or App;

- account status and activities relating to your User Account.

(b) When you make purchases using the Site or App

- If you use the Site and/or App to make online purchases, some of the personal data we may collect about you includes:
- your product searches on the Site and/or App, to provide autocomplete functionality or to provide you with information about products related to your search. Please note that your search results do not constitute personal data unless we combine it with other information about you which would allow us to identify you. If we do so, we will treat your search keywords as your personal data and store and secure your personal data as described under this Privacy Policy. We may also use this personal data to improve our services;
- your shopping preferences and choices with respect to favourites, purchases, follow/bookmarks and share functions offered on the Site and/or App. While using the Site or App, you may indicate your interest in certain products and brands, and share this information with us or our third party partners through the Site or App.
- your transaction history or payment details when you purchase anything through our Site and/or App. When you place an order through the Site and/or App, you will be required to provide the recipient's full name, address and mobile phone number. The order form will set out your identification information (for example your name, telephone number etc.), the recipient's address (or installation address for applicable products), the products/services you purchase, the order number, time of order, payment amount and payment method. We collect this information ("**Order Information**") in order to complete and secure your transaction, to allow you to review your order, and to provide related customer services to you. We also use Order Information to verify your identity, confirm the transaction, process payment and complete delivery, assist you with queries about your order and provide other after-sales services. Further, we use Order Information to detect irregular activities to protect your transactions and User Account;
- your identity, Order Information and contact information in order to verify your identity when you request any after-sales services and dispute resolution services. If you send general enquiries or complaints to us, we may use your Order Information and any information you provide to our customer service representatives (including through any surveys) to provide services to you and make improvements to our services.

(c) When you visit our Site or App

We may use online tracking technology such as cookies, pixel tags, web beacons and other similar technologies to automatically collect information about:

- your visits to our Site or App, such as your browsing history, how long you stay on our Site or App, and how often you visit;
- your location information as provided by your mobile phone or other device when you interact with our Site or App, including your IP address and general geographic location (including GPS location and WLAN access point, Bluetooth and other connectivity information); and the device that you use to browse our Site or App (e.g. your operating system, type of device, browser type and version, language preferences, resolution,

internet service provider ID (PLMN), mobile application crashes and other system activity, and third party sites you were using before interacting with our services).

You have the right to disable any of these online tracking technologies. To learn more about how we use the above data, please see the section below on **Online tracking technology**.

(d) When we provide additional services

We may offer the additional services described below to better personalize products and services offered to you and improve your shopping experience, and request that you provide additional personal information by granting permission for the Site and/or App to access your devices' location information, camera/webcam, photo album, microphone and address book. If you do not provide the information described below, or revoke permissions granted, your use of the basic functions of the Site and/or App will not be affected, however you may not be able to receive the additional services. Please note that your decision to revoke permissions will not affect information previously collected and used based on your prior authorization.

- Personalized recommendation service based on location information. We collect your location information to determine your location to recommend goods or services available in your area. We will only collect information about your geographical location at specific points in time, and will not combine information about your location collected over different points in time to establish a trail of your movement.
- Additional features based on cameras / webcams. You can use this additional feature to complete video shooting, picture taking, QR code scanning and other functions.
- Additional features based on file uploading. After granting permission for the Site and/or App to access files on your device, you may use this feature to upload your files, communicate with customer service representatives, and for verification purposes. We may use the files uploaded by you to identify goods or services you wish to purchase, or use comment.
- Additional features based on voice technology. After granting permission for the Site and/or App to access the microphone on your device, you can contact customer service representatives and interact with the customer service bot. We will record your conversation to respond to your customer service or dispute resolution requests.

(e) Other information

We also collect some of your personal data whenever we communicate with you (e.g. email content, contact information, etc.), or when you complete any voluntary surveys and questionnaires we may send you from time to time (e.g. your demographic information and feedback).

6. HOW DO WE USE YOUR INFORMATION?

We will only use your personal data for the purposes set out below.

(a) Account administration

To help administer and maintain your User Account, including:

- creating and updating your User Account;
- verifying your identity;
- creating a single profile about you, including combining your information with any other personal data already held by us or any members of Vertliner;
- providing you with a log-in ID for your User Account to access our Site or App;
- maintaining, updating, administering and processing a record of your activities on our Site or App, including any purchases or orders made by you through our Site for any products or services ("**Orders**") and any points or rewards in relation to any Rewards Programme;
- completing transactions, including processing or facilitating payments;
- sending you updates about new features and benefits relating to our Site and App; and
- enabling features that allow you to personalise your User Account on our Site or App, such as bookmarking your favourite products or brands.

(b) Customer support

To assist you when you contact us, such as responding to and investigating any of your questions or concerns, and monitoring and improving our customer support services, and to assist you with any delivery, refunds, returns or exchanges for any Orders.

(c) Marketing

To provide you with marketing and promotional materials ("**Marketing Communications**"), if you choose to receive them. Please see the section on **Direct Marketing** below for more information.

(d) Personalisation

To create personalised Marketing Communications tailored to your interests and preferences, and to provide you with the best possible customer experience in relation to our Site, App, and your User Account. We may also use data analytics tools to conduct profiling and to determine whether our or any Vertliner members' offers, advertisements and promotions are effective, as well as to determine whether you may be interested in new products or services, or to customise the content and types of offers, products, and services that we present to you.

(e) Optimisation and improvements

We may use your personal data to understand and improve our Site, App, or our partners' operations, or our Vertliner members' operations, through various means, such as the use of analytics tools, research, surveys and feedback forms. This will enable us, our partners, and Vertliner members to enhance services or products, develop new features and benefits, and assess and amend business, marketing and strategic operations and plans.

(f) Legal and administration purposes

We may use your personal data to investigate or handle any incidents, claims or disputes, or as otherwise required by law in connection with your User Account, our Site or App, or as requested by any law enforcement or regulatory authorities, courts or other governmental

agencies. We may also use your personal data in relation to any legal proceedings concerning you.

(g) Online purchase

To administer, process and manage your Orders, including any delivery, arrangement for collection, refunds, returns or exchanges.

7. WHO DO WE SHARE YOUR INFORMATION WITH?

To protect your privacy, we will endeavour to only share with third parties data which has either been aggregated and anonymised or which otherwise does not contain your name or contact details. However, there may be limited circumstances where we will share data (which may include your personal data) with third parties who may or may not be located overseas, as detailed in this section. By using our Site or App, or applying for a User Account, you agree to allow us to share your personal data with third parties and to the cross-border transfer of your personal data in accordance with this section. Regardless of where we store or process your personal data, we are committed to protecting it and will take reasonable steps to safeguard it in accordance with this Privacy Policy and all applicable laws.

(a) Partners

If you create a User Account with us, your personal data may be shared with our partners to facilitate the processing of payments and delivery, conduct profiling and risk analysis of your User Account, and related services and transactions, as well as for data analytics purposes in order to improve their operations, services or products.

(b) Vertliner

Your personal data may be transferred to any Vertliner members for any of the purposes we have set out above. However, we will not provide your personal data to any Vertliner member in order for them to send you marketing materials regarding their own products and services, unless we obtain your prior consent.

(c) Service providers and/or Affiliate Partners

Your personal data may be shared with our or any Vertliner members' service providers and or Affiliate Partners (including agents and contractors) who process personal data on our behalf to help us administer and operate our Site and our App, to conduct identity verification, profiling and data analytics/processing, process Orders and payments, arrange delivery, conduct marketing activities, to help aggregate and anonymise the personal data, or to carry out any of the purposes set out above. These may include IT vendors, back-office and front-end or ancillary service providers, call centre operators and marketing agencies, data management and analytics service providers, and customer contact services. Our service providers may contact you on our behalf or on behalf of our Vertliner members, for any of the purposes set out above.

We only use trustworthy service providers, who are under a duty of confidentiality to us and/or our affiliates, and are only permitted to use your personal data in accordance with this Privacy Policy.

(d) Professional advisors and assignees

When necessary, we may share your personal data with our professional advisors, including lawyers, accountants, financial advisors and insurers. Your personal data may also be shared with third parties in connection with any merger, acquisition, consolidation, restructuring, sale of assets, financing or any other similar scenarios involving the transfer of some or all of our business assets.

(e) Government and regulatory authorities

This Privacy Policy is governed by the laws of Greece. We strive to handle your personal data in accordance with any data privacy laws that we believe apply to us. Your personal data may be shared with regulatory authorities, courts and other governmental agencies to comply with any legal or regulatory requirements, orders or requests. Any dispute concerning the terms and conditions of this Privacy Policy shall be subject to the exclusive jurisdiction of the courts of Athens, Greece.

8. AGGREGATED AND ANONYMISED DATA

Aggregated or anonymised data that does not include any personally identifiable information may be used by us, our Vertliner members or other third parties for various purposes, including enabling them to better understand customer needs or to improve and adapt their operations, products and services, or for the purposes of industry benchmarking, machine learning, research or analytics.

9. DIRECT MARKETING

If you have opted to receive offers and promotions from us, we may use your personal data to:

- send you Marketing Communications in connection with the latest news, events, updates, contests, promotions, offers;
- products, services and rewards offered by us, our partners, or our Vertliner members, which relate to our Site or App, reward programmes, retail, clothing, accessories, cosmetics, beauty, healthcare and wellness, personal care, toiletries and medical, baby care, maternity care, insurance, financial, music, sports, lucky draws and contests, food, beverages, dining, travel, transportation, banking, electronics, home, household, textiles, telecommunications, groceries, office and business supplies, technology, outdoor furniture and accessories, furniture, lighting, décor, home accessories, media, e-commerce platforms and facilitators, and publications;
- analyse your preferences, online behaviour and transactional history in order to gain insights, so that we can customise the content and types of news, events, updates, contests, promotions, offers, products, services and rewards that we present to you via our Site, our App or Marketing Communications, social media or other communication means; and

- in conjunction with any seasonal events, lucky draws and contests or other promotional activities.

We may send you Marketing Communications and market research invitations by email, through your User Account or in-app notifications on your mobile device, when you access the Site or App, or through online banner advertisements, post, telephone or SMS.

Before providing you with Marketing Communications, we will always ask for your consent. You can choose at any time not to receive any Marketing Communications from us. Please see the section on Your rights below.

10. CAN OUR PARTNERS AND AFFILIATES SEND YOU MARKETING MATERIALS?

If you have agreed to receive Marketing Communications from us, our Vertliner members or our partners may occasionally act as our service providers and send Marketing Communications on our behalf. However, **we will** not provide your personal data to Vertliner members or our partners for them to send you marketing materials regarding their own products or services, unless you allow this.

If any of our partners or Vertliner members wish to send you any marketing materials regarding their own products and services directly, then they must obtain your separate consent for this. We are not involved in any marketing done directly by Vertliner members that concerns any reward programmes, or products or services offered or provided by them, or by our partners that is unrelated to the Site or App. If you agree to receive any marketing materials from our partners or Vertliner members, then please carefully read our respective partners' or Vertliner members' own privacy policies.

11. HOW DO WE KEEP YOUR INFORMATION SECURE?

We take the confidentiality and security of your information seriously. We take all reasonable steps, including the implementation of technical and physical security measures, to ensure that all your personal data held by us is kept secure and safe from any loss or unauthorised disclosure, use and modification. All transactions under the terms and conditions of this Privacy Policy are based on the encryption of data exchanged between you and us on our secure Site and App.

12. HOW LONG DO WE KEEP YOUR DATA FOR?

We will keep your personal data only for so long as is necessary to fulfill the purposes outlined in this Privacy Policy, unless the law requires us to keep it for a longer period. Once we no longer need your personal data, we will either irreversibly anonymise or securely delete it on our servers.

13. YOUR RIGHTS

(a) Access and correction

You have the right to access and correct your personal data held by us, at any time, by sending an email to our Data Protection Officer at legal@vertliner.com.

In order to ensure that your personal data is kept as accurate as possible, please notify us at the email address above of any changes to your personal data.

(b) Opt-out of direct marketing

At any time, you can ask us to stop using your personal data to send you Marketing Communications, or you can customise how you would like to receive Marketing Communications from us. You can exercise your rights to do this by:

- changing your settings on your User Account; or
- following the unsubscribe instructions in the Marketing Communications we send to you.

We will stop using your personal data to send you Marketing Communications in accordance with your request. However, we may still send you non-promotional communications such as information concerning the administration of your User Account, and may use non-personally identifiable information collected via cookies and other tracking technology to display marketing information via online advertising banners on websites and apps visited by you.

We are not involved or responsible for any marketing materials sent directly by our partners or Vertliner members that concern any reward programmes, or products or services offered or provided by them that are unrelated to the functions of the Site or App. If you would like to stop receiving any marketing materials from our partners or Vertliner members, then please contact them directly in order to unsubscribe from their mailing lists.

14. ONLINE TRACKING TECHNOLOGY

Cookies are small text files that are stored on your browser or device by websites, applications, online media and advertisements when you visit a website.

We use cookies and other similar identification technologies such as web beacons, ETags and pixel tags on our Site, App, emails and online advertisements for various purposes, including verifying users; remembering user preferences and settings to enhance your experience when you return to our Site or App; delivering relevant content and advertisements based on your preferences, location and usage patterns; monitoring, evaluating and optimising the operation of our Site and App; tracking and measuring the effectiveness of our advertising campaigns; and analysing traffic on our Site, our App and the websites of our partners and Vertliner members.

You can exercise your right to choose whether or not to accept cookies by adjusting your browser settings to modify your cookie preferences. Most browsers are set to accept cookies by default, but you are free to remove or block all browser cookies. However, if you turn off your cookies, some of our services may not function properly and you will not be able to receive the most efficient and personalised experience.

15. LINKS TO OTHER SITES

Our Site and App may contain links to other third party websites and applications, including those of our partners and our Vertliner members ("**Third Party Sites**"). We do not own or control, and are not responsible for, the privacy practices of those Third Party Sites. We encourage you to remain alert if you follow any links to leave our Site or App, and to review the

privacy policies of those Third Party Sites so that you are aware of how your personal data may be collected and used by such third parties.

16. INFORMATION YOU PROVIDE ABOUT OTHERS

Please ensure that you are legally authorized to share with us any information that contains personal data of another person.

17. HOW DO WE MANAGE UPDATES TO THIS POLICY?

From time to time, we may update this Privacy Policy to reflect new technologies, regulatory requirements or any other changes that may be necessary. We will notify you of any updates in accordance with your preference settings and, where required by law, obtain your consent. We will inform you by emailing you at the email address you provided us, and/or by posting a notice of these changes on our Site.

18. HOW TO CONTACT US

If you have any questions or comments concerning this Privacy Policy, you can contact our Data Protection Officer at legal@vertliner.com.