PRIVACY NOTICE

1. General provisions

EIT FOOD strives to respect and protect the privacy and confidentiality of the personal data of its own personnel, the personnel of affiliated companies, independent contractors, subcontractors, consultants, and any other natural person directly or indirectly involved in the services of EIT FOOD ("**Data Subjects**").

With this Privacy Notice ("**Privacy Notice**"), EIT FOOD wishes to inform its Data Subjects in a transparent and clear manner about the processing of personal data, as well as to provide them with more information regarding any rights they have in this respect.

In this Privacy Notice, (i) "**Employer**", "**we**", "**us**", "**our**" or **"EIT FOOD"** shall mean: EIT FOOD IVZW, with registered office at Philipssite bus 34, Ubicenter A, 3001 Leuven and company number 0672.423.992.

EIT FOOD undertakes to use personal data in a discreet manner and to protect its confidentiality and privacy. This is done in compliance with the applicable legislation, such as Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC ("**GDPR**") and the Act of 30 July 2018 on the protection of individuals with regard to the processing of personal data, and repealing the Act of 8 December 1992 on the protection of privacy with regard to the processing of personal data ("**Privacy Act**"). EIT FOOD has, to the best of its ability, taken the necessary legal, technical and organisational precautions to avoid unauthorised access to and use of the personal data.

For the purposes of this notice, "**Personal Data**" shall mean any information relating to a Data Subject. "**Private Email Folder"** shall mean a designated folder within a person's EIT FOOD email account for storing private communications that are unrelated to work. "**Work-Related Emails**" shall mean any emails related to the business operations of EIT FOOD, including internal communications and external communications with third parties on behalf of EIT FOOD; and "**Termination**" shall mean the cessation of the personnel's contractual relationship with EIT FOOD whether by resignation, dismissal, or other means.

If a Data Subject has any questions, comments or complaints regarding this Privacy Notice or the processing of his/her personal data or if a Data Subject wishes to submit a request under Article 7, this can be done by contacting the EIT FOOD privacy team in one of the following ways:

- By email: privacy@eitfood.eu
- By post: Privacy EIT Food, attn HR & Legal, Philipssite bus 34 Ubicenter A, 3001 Leuven

This Privacy Notice was last updated on 24 July 2026.

2. Lawful Bases for Processing Personal Data

All processing of personal data, including information contained within EIT FOOD email accounts, shall be undertaken on the following lawful bases, as set out in Article 6 GDPR:

- Performance of a contract: Processing necessary for fulfilling obligations under an employment or services contract.
- Legal obligation: Processing necessary to comply with applicable legal requirements, regulatory obligations, or orders of authorised public authorities.
- Legitimate interest: Processing necessary for EIT FOOD's legitimate interests, including business management, compliance, and protection of company interests, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject.
- Consent: Where processing is based on consent, the data subject may withdraw such consent at any time, although this will not affect the lawfulness of processing prior to withdrawal. Processing sensitive personal data (e.g. racial or ethnic origin, political opinions) is prohibited unless specifically volunteered by the data subject.

Access to personnel email accounts post-termination will only occur under lawful bases of legitimate interest, legal obligation, or contractual necessity and strictly for purposes such as regulatory compliance, investigation of breaches, or protection of EIT FOOD's interests.

3. Security and Acceptable Use

Personnel must keep all login credentials for EIT FOOD systems, including email accounts, confidential and secure. Personnel must:

- Create and clearly label a 'Private' folder within their EIT FOOD email account for any non-work-related emails.
- Ensure the prompt transfer of all personal or private emails to the designated Private Email Folder. No private emails may remain in work-related email folders or inbox.
- Regularly review and manage the Private Email Folder to ensure compliance and housekeeping.
- Not share or disclose login credentials or make them accessible in insecure places. EIT FOOD will implement appropriate technical and organisational measures to protect against loss, unauthorised access, disclosure, alteration, and unlawful processing of personal data.

Any (suspected) data breach must be reported immediately. EIT FOOD shall investigate, act to limit impacts, and comply with notification obligations to authorities and affected individuals, where legally required.

4. Retention of Personal Data

EIT FOOD will store personal data for the duration of the contractual relationship and for as long as necessary for processing purposes or to comply with applicable laws:

- Upon termination, EIT FOOD will access only work-related email folders if and as required, under a lawful basis.

- All private email folders and subfolders within the EIT FOOD email account will be deleted immediately following termination; private communications will not be accessed or retained.
- The entire EIT FOOD mailbox (all folders and content) shall be permanently deleted six months after termination of the contractual relationship, except where further retention is required by law.

Retention of other data (e.g. payroll) adheres to statutory periods, such as five years for payroll records under Belgian law.

5. Data Subject Rights

Data subjects have the right to access their personal data, request rectification, restriction, or erasure (including the right to be forgotten) of personal data, and to object to processing under certain circumstances. Upon termination, this includes:

- Immediate deletion of private email folders and associated personal communications from the EIT FOOD email account.
- The right to request erasure or review of work-related emails, subject to overriding legal or regulatory needs. Data may be retained beyond erasure requests only if necessary for compliance with legal obligations or the establishment, exercise, or defence of legal claims.
- Right to file a complaint: The Data Subject has the right to submit a complaint to EIT FOOD via the contact details mentioned above or, if desired, directly to the supervisory authority. In Belgium, Data Subjects can file a complaint with the Data Protection Authority, Drukpersstraat 35, 1000 Brussels. (contact@apd-gba.be; +32(0)2 274 48 00)

6. Post-Termination Access and Deletion

Following termination of the contractual relationship:

- Work-related emails may be accessed by EIT FOOD solely for regulatory, legal, or business needs, on lawful grounds.
- All private email folders (and their contents) are deleted immediately on termination; such private communications shall not be accessed by EIT FOOD at any time post-termination.
- The entire email account, including all folders and contents, is permanently deleted six months after termination, unless further retention is lawfully required.

8. Amendments to the Privacy Notice

EIT FOOD reserves the right to amend the Privacy Notice from time to time and as it sees fit. The most recent version of our Privacy Notice will always be published on the SharePoint under Compliance/Policies.

9. What procedure applies in the event of a data breach?

Each Data Subject of EIT FOOD shall be responsible for reporting any data breach or suspected data breach to EIT FOOD immediately. In turn, EIT FOOD shall be obliged to investigate any such data breach and/or suspicion of a data breach, to stop it or at least to limit its impact as much as possible. If EIT FOOD identifies a data breach that is likely to pose a risk for the individual concerned (including the Data Subject), EIT FOOD shall inform the Data Protection Authority without undue delay and not later than 72 hours following the data breach. The associated risks will be assessed on a case-by-case basis, as the potential risks depend on many factors, such as the content of the data breach, the nature of the organisation, etc. In addition, EIT FOOD will also inform the relevant individual, including the Data Subject, to whom the personal data relates in case a high risk exists for the rights and freedoms of the individual. The assessment of such high risk will also be done on a case-by-case basis.

10. Applicable law and jurisdiction

This Privacy Notice shall be governed, interpreted and enforced in accordance with Belgian law, which shall apply exclusively to any dispute.

The courts of Leuven, Leuven division, shall have sole jurisdiction to rule on any dispute that may arise from the interpretation or implementation of this Privacy Notice.

I acknowledge receipt of this Privacy Notice.

Name:

Signature:

Date: