

**COFCO INTERNATIONAL**  
**Privacy Policy Statement**  
**in relation to on line recruitment**

**Statement of policy**

1. Protecting the security and privacy of personal data is important to COFCO International. We are therefore committed to protecting the privacy, confidentiality and security of the personal data we hold by complying with applicable personal data and privacy protection laws with respect to any personal information that our Recruitment and Human Resources Team (the “**Recruitment Team**”) collects and uses as part of the recruitment procedure, and by ensuring that all of our employees and agents uphold these obligations.

**Statement of purpose**

2. This privacy policy statement applies to our collection and use of personal data in relation to on line recruitment. “Personal data” refers to any data which directly or indirectly identifies you, or is capable of doing so.
3. With your consent, COFCO International and its subsidiaries or associated companies (together “**COFCO International**”, “**we**” or “**us**”) may collect and use your personal data for the following purposes, and purposes directly relating to any of the following purposes:-
  - (a) entering into and maintaining an employment relationship with you;
  - (b) verifying your identity, screening your details against risk prevention and financial crime databases, and carrying out other due diligence and background checks, including where we engage specialist third parties to assist us;
  - (c) performing internal statistical and other analyses; and
  - (d) ensuring compliance with relevant tax, regulatory, anti-money laundering and other applicable laws.
4. Some information we request is mandatory for our recruitment and other processes. In the event that you do not provide any mandatory personal data requested, we may not be able to pursue these processes further.
5. We will collect, use or disclose your personal data only for the purposes listed above. However, we may also use your personal data for other purposes if such use:-
  - (a) is for an additional purpose that is consistent with the original purpose for which your consent was given;
  - (b) is required by law or by governmental or judicial authorities; or

- (c) is necessary to establish or preserve a legal claim or defence or otherwise to protect our legal rights.

### **Statement of information collected**

- 6. Personal data which the Recruitment Team may ask you to provide include, but are not limited to, general identification and contact information, and copies of identification documents.
- 7. Examples of personal data include your name, contact details and copies of identification documents that directly or indirectly identify you personally, or can be used to do so.
- 8. Please note that the accuracy of personal data we collect, use and disclose depends to a large extent on the information you provide. You have a right to request access to and correction of your personal data (as discussed below) and we ask that you:
  - (a) inform us of any inaccuracies in the personal data you have provided to us; and
  - (b) update us of any with changes to your personal data over time.

### **Retention of personal data**

- 9. We will keep your personal data for so long as they serve the original or directly related purposes for which the data was collected, and are otherwise required for legal or business purposes. Thereafter, we will take reasonable steps to erase or destroy copies of your personal data in our records.

### **Disclosure of personal data**

- 10. We will take all practicable steps to keep your personal data secure and to prevent any unauthorized use and disclosure. However, we may disclose personal data when required or authorized to do so by law, for example, in response to court orders, as requested by law enforcement and regulatory authorities, or to protect our legal rights.
- 11. We may also share your personal information with third parties where necessary in the context of a transaction affecting COFCO International and/or its subsidiaries, for example if we decide to sell, buy, merge or otherwise reorganize one or more of our businesses, which may require the disclosure of such data to prospective counterparties.

### **Data security**

- 12. We will use IT and organizational security measures to protect your personal data against accidental or unlawful destruction, loss or alteration and against unauthorized disclosure or access. This will include, but is not limited to, the use of network firewalls, physical security, and policies and measures appropriately restricting employees' use of and access to your personal data. In particular, authorization for employee access will be restricted in a manner that is commensurate with that employee's responsibilities and training.

## **Outsourcing arrangements / Transfers**

13. Your personal data will be collected by us via an on line applicant tracking system called Taleo, and securely stored on the servers of Taleo in the US.
14. Solely for the above-mentioned purposes for which the personal data are to be used, Taleo may also transfer the personal data collected to subsidiaries and associated companies within COFCO International, our professional advisers, and service providers engaged in contractual activities on our behalf. If your personal data is to be transferred to a third party, we will require that third party to adhere to the same standards that apply to us regarding the protection of your personal data.
15. In relation to the above, we may transfer your personal data outside of the US for the purposes set out in this privacy policy. Where we transmit your personal data, we will take all steps reasonably necessary to protect it from accidental and/or unauthorized disclosure, change and/or destruction.

## **Access and Correction**

16. The privacy laws of some countries give persons the right to access and amend their personal data. Where such laws are applicable to your personal data that we have collected or are using, you may have a right to request access to, and to correct any inaccurate, personal data relating to you in our records. You may request access or corrections to any inaccuracies in your personal data by writing to the Recruitment Team.
17. We will respond to you within a reasonable time and within the time limits established by applicable law. We may ask you to provide additional information to verify your identity, and we may otherwise take measures to satisfy ourselves of the authenticity and validity of the data access request. We may charge you a reasonable fee for processing any data access request.
18. In most cases, we will provide you with access and correct or delete any inaccurate personal data we hold, but in some cases we may limit or deny your request if permitted or required to by law, or if we cannot verify your identity or the inaccuracy.

## **Complaints**

19. If you have any concerns or complaints regarding this privacy policy or the handling of your personal data in the counterparty on-boarding process, please contact our Compliance department at [Compliance@cofcointernational.com](mailto:Compliance@cofcointernational.com).
20. You may also have the ability to make a complaint with relevant government authorities under applicable privacy laws.
21. Please note that this privacy policy statement may be updated from time to time and without prior notice.

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