



Lakeland Dairies

Privacy Notice

This Privacy Notice is issued by Lakeland Dairies Co-op Society Ltd of Killeshandra, Co Cavan (the "**Company**", "**we**", "**us**", "**our**"). We take our responsibilities under applicable data protection law; including the General Data Protection Regulation and implementing legislation such as the Irish Data Protection Act 2018 and the UK Data Protection Act 2018 ("**Data Protection Law**"), as applicable, very seriously.

The purpose of this notice is to inform you of the data relating to you that we may collect and use and the uses (including disclosures to third parties) we may make of such data. This Privacy Notice is addressed to the following categories of individuals:

- Shareholders of Lakeland Dairies

Personal Data that we Collect and Process

We may collect and process data relating to you during the course of our relationship with you. Such data may include:

Where you are a **Shareholder** of Lakeland Dairies:

- *your name and contact details, including your address, phone number and email address;*
- *your date of birth;*
- *your nationality;*
- *your bank account details, including your account number and sort code;*
- *your tax details;*
- *a statement of the shares held by you in the Company and the amount paid on the shares;*
- *details regarding dividend, interest or any other moneys paid to you where relevant;*
- *the date on which you were entered onto the Company's register of members;*
- *the date on which you cease to be a shareholder in the Company;*
- *any other personal information you have provided directly to us.*

Purposes of Processing and Legal Basis

We, and third party service providers acting on our behalf, will use personal data relating to you for various purposes.

Where you are a **Shareholder** of Lakeland Dairies, these purposes may include:

- *maintaining and administering the Company's register of members;*
- *filing annual returns and associated financial statements with the Companies Registration Office;*



- *maintaining and administering a register of beneficial ownership;*
- *analysing beneficial and legal shareholdings for tax and jurisdictional purposes and/or to facilitate shareholder consultations or proxy solicitations;*
- *maintaining records of member meetings, votes and resolutions and providing voting and proxy services;*
- *offering shareholder and investor services;*
- *contacting you in order to give you notice of company meetings and to provide you with company documents;*
- *soliciting voting proxies in relation to resolutions being put to members at a company meeting;*
- *engaging in consultations with shareholders on company issues;*
- *determining whether you would like to participate in certain equity offerings such as private placements, rights offerings, etc.;*
- *processing shareholder requests in relation to change of address, change of mandate and/or merging shareholdings;*
- *dealing with notifications of the death of a shareholder;*
- *paying you a dividend, interest or any other moneys payable where relevant;*
- *processing the purchase or sale of shares in the company and registering transfers of shares;*
- *any reorganisation of the share capital of the company which affects your rights as a shareholder;*
- *anti-money laundering, fraud prevention, investigation and detection;*
- *complying with market abuse law and regulation to the extent applicable to the Company;*
- *facilitating or implementing a business re-organisation or a transfer/sale of all or part of our assets or business of the company or a general investment;*
- *dealing with routine correspondence with Registrar of Companies and handling shareholders' or their agent's enquiries via telephone, letter or email;*
- *establishing, exercising or defending legal claims; or*
- *complying with any obligations imposed on the company by applicable law.*

The legal bases on which we collect, process and transfer your personal data are:

- *that this is necessary for compliance with a legal obligation that applies to us;*
- *that this is necessary for the performance of our contract with you through the constitution of the company;*
-



- *that this is necessary for the purposes of our legitimate interests or the legitimate interests of a third party. We will not process your personal data for these purposes if our or the third party's legitimate interests should be overridden by your own interests, rights and freedoms. The legitimate interests for which we process your personal data include our legitimate interests in:*
 - *conducting our business in a responsible and commercially prudent manner;*
 - *preventing, investigating or detecting theft, fraud or other criminal activity; and*
 - *pursuing our corporate and social responsibility objectives.*

Recipients of Data

We may disclose your personal data to third party recipients in connection with the above purposes, including:

Where you are a **Shareholder** of Lakeland Dairies:

- *to third parties who we engage to provide services to us, such as professional advisers, auditors and outsourced service providers;*
- *to our investment manager, its affiliates and their respective service providers from time to time;*
- *to our share registrar and its service providers;*
- *to our depositary and custodian and its service providers;*
- *to our sponsor, broker and financial advisors;*
- *to other members of our corporate group;*
- *to financial intermediaries and lenders;*
- *to business partners and/or possible acquirers of the company or investors (and our and/or their advisors);*
- *to competent regulatory authorities and bodies as requested or required by law; or*

Retention

- Where you are a **Shareholder** of Lakeland Dairies, we will retain your personal data for the duration of your shareholding in the Company and for such a period of time after you cease to be a shareholder in the Company as is necessary to comply with our obligations under applicable law and, if relevant, to deal with any claim or dispute that might arise in connection with your shareholding.

Transfers Abroad

In connection with the above we will not transfer your personal data outside the European Economic Area.

Requirement to Provide Data



Where you are a **Shareholder** of Lakeland Dairies: You are under a statutory obligation to provide us with certain personal information under the Companies Act 2014 (as amended), the Transparency (Directive 2004/109/EC) Regulations 2007 (as amended), and the Market Abuse Regulation ((EU) No. 596/2014).

You are also under a contractual obligation to provide us with certain personal information under the Company's Articles of Association.

If you do not provide us with this personal information, you will be in breach of your applicable statutory or contractual obligations, and we may have such legal rights and remedies against you as are available under applicable law and/or the Company's Articles of Association.

Where you are a **Supplier** of Lakeland Dairies: [*Contractual obligation to provide certain personal data for the performance of the agreement*]

Your rights

You have the following rights, in certain circumstances and subject to certain restrictions, in relation to your personal data:

- the right to access your personal data;
- the right to request the rectification and/or erasure of your personal data;
- the right to restrict the use of your personal data;
- the right to object to the processing of your personal data;
- where we are processing personal data based on this being necessary for the performance of a contract with you, the right to receive your personal data, which you provided to us, in a structured, commonly used and machine-readable format or to require us to transmit that data to another controller;

In order to exercise any of the rights set out above, you can contact us at dataprotection@lakeland.ie

Complaints

If you are not happy with the way we have used your information or addressed your rights, you have the right to make a complaint to the Data Protection Commission by emailing: info@dataprotection.ie.