

# ADAMA Privacy Policy

This privacy policy ("**Privacy Policy**") is effective since 25<sup>th</sup> May 2018. We may update this Privacy Policy from time to time but we will not reduce your rights. Updates apply as of the effective date, as indicated on the Site.

## Purpose of this Privacy Policy

We are committed to protecting your privacy and ensuring that your personal data is protected. The purpose of this Privacy Policy is to explain what we do with personal data that you provide to us ("**Personal Information**"), such as your name, mailing or email address.

This website is operated by ADAMA Agricultural Solutions Limited, registered at Golan Street, Airport City, 7015103, Israel ("**ADAMA**"). Any Personal Information processed by ADAMA in connection with this website is controlled by ADAMA, which is the "**data controller**" of your Personal Information.

Some of our subsidiaries may also operate public websites, and in this Privacy Policy, any reference to "**Site**" means this website and the websites of our subsidiaries and affiliates and "**we**", "**our**" or "**us**" refers to **ADAMA** and its subsidiaries and affiliates ("**ADAMA Group**").

In particular circumstances indicated below, ADAMA is not solely, but jointly responsible with other ADAMA Group companies, for the lawfulness of the processing of your Personal Information.

## Third Party Websites

This Privacy Policy applies to Personal Information in relation to your use of our Site. It does not apply to information collected by third party websites, platforms and applications that you may access through links on the Site. Such third party websites, platforms and applications may have their own privacy policies.

## Legal Bases for Processing of Personal Information

We may process your Personal Information on the various legal bases of i) your consent or explicit consent, as the case may be, ii) fulfilling a contract with you, iii) meeting our legal or statutory obligations, iv) legitimate interests as outlined below, v) in order to protect the vital interests of you or other individuals, or vi) for the establishment, exercise or defense of a legal claim.

## What and How We Collect and Use Personal Information

The Site automatically logs and we process information from the browser used to access the Site, for example, your IP address, the pages that are visited from that address, and the website from where you visit the Site, if your computer is set to allow that type of collection. We use such information to evaluate interest in our Site and to perform other market research activities, such as surveying browsing habits on our Site. We do not use such information to identify the user who is accessing the Site.

Most of our services do not require registration. However, some of the services available through the Site may require registration. You may be asked to supply, and we will therefore process your contact details, such as name, location and information about your business, occupation or an e-mail address. You may also be offered to submit questions or comments to us, or to provide additional information through surveys or contests. Providing such information is entirely voluntary. If you do provide such information, we may use it to contact you and to inform you of changes to our services or our Site, if it is necessary for the abovementioned purposes. We may also use such information to enhance the usability of the Site and to ensure it is relevant and meets your needs.

We may also ask you to provide consent to certain data uses if we need to use your Personal Information for purposes not covered by this Privacy Policy. You are not obliged to provide such consent, but if you prefer not to, participation in certain activities may be restricted. Such restriction will only apply if Personal Information collected with your consent are necessary for performance of a contract with you, under which we provide such activities.

Moreover, we may use Personal Information if deemed necessary to protect us from a security risk, and we may share such information with law enforcement authorities if appropriate.

	<b>Processing</b>	<b>Legal Basis for Processing</b>
Contact form	If you fill out and submit the contact form at <a href="https://www.adama.com/en/contact-us/index-contact-us-form.html">https://www.adama.com/en/contact-us/index-contact-us-form.html</a> we will process your Personal Information to respond to your queries, comments, or requests for information. We may also use the data collected through the contact form to enter into business relationship with you or the organization you represent. We may	ADAMA relies on legitimate interest when processing your Personal Information collected through the contact form. When filling out the contact form you may optionally sign up for our mailing list by clicking relevant

	retain your queries for a certain time for internal administrative purposes, or in order to improve our services or products.	tick box. By signing up for our mailing list you consent to ADAMA processing your Personal Information for marketing purposes and to receiving from us communication such as press releases, stock exchange filings, updates about ADAMA products and services and information about our events. ADAMA relies on your consent to send you the abovementioned communication.
Your correspondence with ADAMA	If you correspond with us by email, the postal service, or other form of communication, we may retain such correspondence and the information contained in it and use it to respond to your inquiry, to notify you of our events or products or to keep a record of your complaint.	ADAMA relies on legitimate interest when processing your Personal Information for correspondence purposes.
Business relationships with our contractors	In the course of our business, we collect data that is necessary for the performance of contracts with our contractors, suppliers and other parties. If you decide to enter into a business relationship with ADAMA, we need to process your data in order to conclude and perform the contract.	ADAMA relies on necessity for performance of a contract with you when processing your Personal Information.
If you represent other person or entity	If you represent other natural person (e.g. farmer) or legal person (e.g. distributor of our products) we collect your Personal Information for contact purposes and to perform contract with the entity you represent. If you are a	If you represent other person or entity, we rely on our legitimate interest when processing your Personal Information.

	<p>sales representative of one of the distributors of our products we collect your data in order to execute new orders for our products, provide you with information on our new products, or on the application of our products in the fields, news about crops and weather conditions, information on the economy. We do it to improve your professional knowledge and sales skills. If we did not received data directly from you, we obtained it from the entity you represent.</p>	
<p>Newsletter and marketing communication</p>	<p>If you subscribed to one of our newsletters such as: blog updates, product updates, technical updates, industry updates we process your data for direct marketing purposes, including profiling. We may inform you of our new products, events, discounts on our products, field information, whether conditions and more.</p> <p>If you provided us with more detailed information such as types of crops, size of your field, country or region of your field or information on your preferences we may send you news tailored to your needs or preferences, based on profiling.</p>	<p>When sending you marketing communication we rely on your consent.</p>
<p>Business events</p>	<p>We process Personal Information of participants who are interested in our offer and decided to provide us with their contact details during various events organized by ADAMA, as well as those in which ADAMA participates. These include company events, business meetings, trade shows, conferences, presentations of our products and others.</p> <p>During the abovementioned events you can also subscribe to our newsletter.</p>	<p>ADAMA relies on legitimate interest when processing your Personal Information collected during business events.</p>

Website users	We use cookies to help us enhance your experience when using our website. In some cases, cookies can be considered as personal data. We may collect cookies that are essential for the website user experience, as well as cookies used for functional, statistical or marketing purposes. For more information please see our Cookies Policy.	When processing cookies ADAMA relies on your consent on necessity for performance of a contract with you, or on legitimate interest, depending on the type of processing and cookies.  For more information about how we collect and use cookies, please see our Cookies Policy.
Recruitment	ADAMA may processes Personal Information for recruitment purposes. In connection with a job application or inquiry. ADAMA may collect the data in your resume or other recruitment documentation you provide to us or via recruitment agencies. The scope of Personal Information we process depends on the information you provide in your application. If you agree, we may use your data also for future recruitment processes.	The legal basis for processing Personal Information is the necessity for the conclusion of a contract with you or our legitimate interest to ensure compliance in our recruitment process, including combating of employment discrimination. If you agree to participate in our future recruitment processes we rely on your consent when processing your data.
My ADAMA	My ADAMA is an online service for ADAMA clients (i.e. farmers, agronomists and other professionals) Through My ADAMA we inform registered users about <i>weather conditions in your region, crop protection information, market insight, ADAMA events or public events and our products and services.</i>  In the account opening process we collect your Personal Information:	If you create a My ADAMA account we will process your Personal Information to conclude and perform a contract with you. When we process your data for security, analytical purposes or to improve our services

	<p>email, first name, surname, country/region, city and profession. Providing this data is voluntary, however necessary to sign up for My ADAMA.</p> <p>We will process your Personal Information also for security and analytical purposes to understand how users use and interact with My ADAMA. This will also help us to improve My ADAMA service.</p> <p><b>Tailored news</b></p> <p>If you provide additional information in the registration process such as types of crops and size of land we may recommend our products, services and plant cultivation tips that best suit your needs. Providing additional data is optional.</p> <p><b>ADAMA newsletter</b></p> <p>During registration you may sign up for an ADAMA newsletter to receive updates on our products. Please see section: e) Newsletter and marketing communication. You may unsubscribe from ADAMA newsletter at any time by changing your preferences in <a href="#">Account Settings</a>.</p> <p><b>Creating My ADAMA account</b></p> <p>If you choose to sign up for My ADAMA with your email we will send you a link to confirm your account. After clicking a link you will be able to complete registration.</p> <p>ADAMA allows you to create a My ADAMA account and log in to use My ADAMA through your account on third-party platforms such as Google, Twitter and Facebook.</p> <p>If you decide to register through or otherwise grant us access to your account on a third-party platform, we may collect Personal Information that is</p>	<p>we rely on our legitimate interest.</p>
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	<p>already associated with your account on that platform, such as your name, email address, activities or your contact list associated with that account.</p> <p>You may also have the option of sharing additional information with ADAMA through your third-party social media service's account. If you choose to provide such Personal Information, during registration or otherwise, you are giving ADAMA permission to use, share, and store it in a manner consistent with this Privacy Policy.</p>	
<p>Electronic signature</p>	<p>This section is for our contractors or potential contractors, business partners and investors who are requested to sign with us contracts and/or other documents electronically (eg. through DocuSign and/or other tools).</p> <p>Your Personal Information collected while electronically signing a document is processed for the purposes of business execution, in particular for the conclusion and execution of agreements between ADAMA and contractors or potential contractors, business partners and investors, to comply with legal or regulatory requirements, litigation and defense of claims and for the prevention, detection and investigation of fraud.</p> <p>When using DocuSign or other electronic signature tools we may collect your Personal Information such as: name, job title, IP address, signature.</p> <p>We may share your data with our contractors, potential contractors, business partners, investors and other companies within ADAMA Group. We may also share your data with service</p>	<p>The legal basis for processing your Personal Information is the necessity for the conclusion and execution of a contract with you or, if you only represent our contractor, potential contractor, business partner or investor, our legitimate interest.</p>

	providers (such as DocuSign and cloud service providers).	

### **How We May Share Personal Information**

We may share Personal Information about visitors to our Site among the companies of our global ADAMA Group, including in countries without adequate data protection, for purposes related to the business of those companies. We may also share Personal Information about website visitors with third parties to comply with law, court orders, or legal process; to enforce or apply our agreements or protect us and our rights, by operation of law, when such Personal Information is transferred as a part of sale of assets.

We will provide aggregated data about products and services purchased, visitor interests, demographics and other information collected from our Site to trade partners, advertisers and other interested parties so that they can learn what products and services are most popular to our customers. Aggregated data will be in anonymous group statistical form and not associated with any individual person.

We share your Personal Information with our customers as well as our service providers who perform services on our behalf for the purposes described above. In particular, we share Personal Information with providers of marketing services, hosting services and IT support. The service providers are bound by law and/or contract to protect the confidentiality and security of Personal Information, and to only use Personal Information to provide requested services to us in accordance with applicable law.

We share your Personal Information with other companies, vendors and business partners which perform certain functions for us, whereby these companies are themselves responsible to determine the purposes and/or means of the processing and for the lawfulness of the processing, in particular, such as banks, financial institutes and credit card companies.

### **International Transfers of Personal Information**

Given that ADAMA Group companies are located and provide services all over the world, we need to transfer your Personal Information internationally. Some countries outside the European Economic Area in which group companies are located, namely Israel and Switzerland, have been officially recognized as providing an adequate level of protection for Personal Information. The transfer of Personal Information to other non-



EEA countries which do not have the same level of protection for Personal Information as in the EEA, takes place on the basis of our Intra-Group Data Sharing Agreement, which is based on the European Commission's standard contractual clauses for data transfers, and in accordance with applicable data protection laws.

Some of the service providers and other third parties with whom we share Personal Information may also be located in non-EEA countries that do not provide an adequate level of protection for Personal Information. Transfers to these third parties take place using an acceptable lawful data transfer mechanism, such as the EU- standard contractual clauses for data transfers.

Please write to our contact email address listed below, if you want to receive further information or, where available, a copy of the relevant data transfer mechanism.

### **How Long Do We Keep Your Personal Information**

We keep your Personal Information that we obtain about you through this Site for no longer than is reasonably necessary for the purpose(s) for which they were collected, but generally, we retain such Personal Information on file for no more than one year. In certain cases, Personal Information may be kept for an extended period of time in order to comply with legal obligations, or for the establishment, exercise or defense of a legal claim, in accordance with applicable laws.

### **Your Rights Relating to Personal Information**

The following rights in relation to the processing of your Personal Information, apply to you only if you are visiting our website from the EU, or where the General Data Protection Regulation or other applicable data protection laws in the EU so provide and are subject to the conditions laid down therein.

In instances where ADAMA Group companies act as joint controllers, you can exercise these rights in respect of and against each of them. ADAMA Group companies which act as joint controllers have entered into an arrangement, reflecting their respective roles and relationships. Please contact us if you want to know more about this contractual arrangement.

### **Access**

You have the right to obtain from us confirmation if your Personal Information is being processed, relevant information about such processing as provided

by applicable EU data protection laws, and a copy of the Personal Information undergoing processing.

### **Rectification**

You have the right to obtain from us the rectification of inaccurate Personal Information concerning you and to have incomplete Personal Information completed. However, no changes to Personal Information will be permitted where the change would result in incorrect information or would alter a transaction with us already completed.

### **Objection**

You have the right to object to the processing of your Personal Information on grounds relating to your particular situation.

You can also object at any time to the processing of your Personal Information for **marketing purposes**. (Please note that even if you object to your use of Personal Information for direct marketing purposes, we will still send you transactional messages in relation to services that you have purchased from us. These include responses to your questions and information about a service you have purchased from us.)

### **Portability**

You have the right to receive the Personal Information concerning you which you have provided to the controller in a structured, commonly used and machine-readable format and have the right to transmit that Personal Information to another controller without hindrance from the controller.

### **Restriction**

You may request to restrict processing of your Personal Information.

### **Erasure**

You may request to erase (delete) your Personal Information.

### **Right to lodge a complaint**

You also have the right to lodge a complaint with a supervisory authority, in particular in EU Member State of your residence, place of employment, or the location where the issue that is the subject of the complaint occurred.

### **Right to refuse or withdraw consent**

You are free to refuse to give consent and you can withdraw (with effect for the future) your previously provided consent to the processing of Personal Information at any time without any adverse negative consequences. The

lawfulness of any processing of your Personal Information that occurred prior to the withdrawal of your consent will not be affected.

## **Social Plugins**

Our Site includes social plugins, such as Facebook, Twitter, LinkedIn and Google ("Social Plugins") which you can use to recommend content on our webpages to your friends and family.

Further information on Social Plugins and the scope and purpose of the data processing by their providers, can be found in the privacy policy of the social media provider.

Please see LinkedIn privacy policy: <https://www.linkedin.com/legal/privacy-policy>

Please see Twitter privacy policy: <http://twitter.com/privacy>

Please see Google privacy policy: <https://policies.google.com/privacy>

## **Facebook**

If you visited Facebook and visit our Site, the browser sends information to Facebook. The data transferred to Facebook may include information such as your user ID, the website you are visiting, date, time, and other browser-related information. Facebook records some of this information and may use it to improve its products and services and for advertising purposes. We have no influence on the scope or content of the data which is collected by Facebook using these plugins. Through the integration of the plugin, Facebook receives the information that you have called up the corresponding page of our Site. If you are logged into your user account at Facebook while you visit our Site, Facebook can assign the visit to this account. When you interact with plugins, for example by using the "like" button or leaving a comment, information about this is transferred directly to Facebook and stored there. If you want to suppress such data transfer, you must log out from your Facebook account before you visit our Site. For the purpose and extent of the data collection and the further processing and usage of the data by Facebook as well as your related rights and setting possibilities to protect your privacy, please refer to Facebook's privacy statement <https://www.facebook.com/about/privacy>.

## **LinkedIn**

We use a plug-in provided by LinkedIn ("LinkedIn"). This plug-in can be recognized by the LinkedIn logo in the "share" button. When you call up a page

on our Site with such a button, your browser will set up a direct connection with LinkedIn's servers, and LinkedIn receives the information that you and your IP address have accessed this Site. If you are logged into your LinkedIn account when you click on the LinkedIn "share" button, LinkedIn can assign the visit to this account. We have no influence on the scope or content of the data which is collected by LinkedIn using this plugin. For information on the purpose and extent of data collection, the further processing and use of such data by LinkedIn, as well as your rights in this regard and your setting options for the protection of your privacy, please refer to LinkedIn's privacy policy.

## **Twitter**

This Site uses Twitter buttons, ("Twitter"). This plugin can be recognized by the Twitter logo or the words "twitter" or "tweet". Among other things, Twitter buttons enable a text or page from this Site to be shared on Twitter. When you call up a page on our Site with such a button, your browser will set up a direct connection with Twitter's servers, and the content of the button will be transferred to your browser, which will incorporate it into the Site. We have no influence on the scope or content of the data which is collected by Twitter using these buttons. According to information provided by Twitter, log data such as your IP address, the site accessed previously etc., is then transferred to Twitter. Further information on this is available in the Twitter data privacy statement at <http://twitter.com/privacy>.

## **Google Analytics**

We use Google Analytics, a web analytics service provided by Google. ("**Google**"). Google Analytics uses cookies to help us analyze how users use the Site. The information generated by the cookie about your use of the Site through the integration of the plugin, Google receives the information that you have called up the corresponding page of our Site. The information generated by the cookie about your use of the Site will be transmitted to and stored by Google. You may refuse the use of cookies opting out from being tracked by Google Analytics with effect for the future by downloading and installing Google Analytics opt-out browser add-on for your current web browser: <http://tools.google.com/dlpage/gaoptout?hl=en>

## **Other Information**

### **Data Security, Transfer through the Internet**

We are committed to keeping your Personal Information safe. However, it is impossible to guarantee absolute security of Personal Information. If you have any concerns that your MY ADAMA account or Personal Information has

been put at risk, for example if someone has used your account, please get in touch immediately.

### **Protection of Minors**

We do not knowingly collect, process or disclose personal information from minors under the age of 16, without obtaining prior consent from parents or a person with parental responsibility.

### **Local Laws and Regulation**

This Privacy Policy is intended to be in compliance with the applicable privacy laws and regulations of each country from which Personal Information is collected. To the extent the laws of a country prohibit us from using and sharing Personal Information in a way described in this Privacy Policy, the Privacy Policy and our practices shall be deemed modified to be consistent with such local laws.

### **Contact Information**

If you have any questions about this Privacy Policy or would like to exercise your rights, please contact our Chief Privacy Officer at [privacy.officer@adama.com](mailto:privacy.officer@adama.com) or:

Address: **ADAMA Agricultural Solutions Limited**  
**[Insert address]**