



## EEA AND UK EMPLOYMENT INFORMATION NOTICE

This Notice explains how Cargill uses Personal Information about you in an employment context as a data controller. We refer to this as “Employment Information”. You also have certain legal rights with respect to Employment Information. This Notice also summarises what these are.

For further details, please read [Cargill's Data Privacy for Employment Information Policy](#).

### 1. WHAT EMPLOYMENT INFORMATION DOES CARGILL COLLECT?

Cargill collects various types of Employment Information about you in connection with your work at Cargill. This includes the following categories:

- Contact details, such as address, telephone number and email address, etc.;
- Financial information, such as salary, bank account details, corporate credit card usage, employment benefits, etc.;
- Recruitment information, such as CVs, application forms, etc.;
- Career information, such as appraisals or performance reviews, disciplinary records, details of skills and experience, absence records, etc.;
- Information about your use of Cargill assets, such as computers and phone, etc (where relevant and permitted to be collected by local law);
- CCTV images and visit information for visitors to Cargill sites.

Cargill generally receives Employment Information directly from you or from third parties, such as Third Party Service Providers that assist with health and safety, travel and expense, and other employment-related purposes described below.

### 2. WHAT WILL CARGILL DO WITH YOUR EMPLOYMENT INFORMATION?

Generally, Cargill only uses Employment Information for employment-related purposes, including:

- **Workforce Planning and Recruitment**, such as job advertising, interviewing, selecting and hiring new staff;
- **Management and Administration**, such as employee career development, compensation and benefits and performance management;
- **Performance of Cargill's Business Operations**, such as carrying out Cargill's day to day business activities;
- **Legal and Regulatory Compliance**, such as compliance with health & safety requirements and other legal or fiscal obligations, participating in due diligence activities for the sale or purchase of a business, or in connection with litigation or an internal investigation or audit;
- **Security Management**, such as activities related to ensuring the security of Cargill premises, assets, information, and Individuals.

Cargill is processing Employment Information because it is necessary for us to do so in connection with your employment contract. In addition, certain processing may be based on your consent or because it is necessary to comply with a legal obligation or to enable us to pursue our legitimate business interests as a leading provider of food, agriculture, financial and industrial products and services.

### 3. CARGILL DATA PRIVACY PRINCIPLES

Cargill observes the following principles in relation to Employment Information:

- **We process it fairly and lawfully;**
- **We process it for a specific legitimate business purpose and do not process in a manner incompatible with that purpose;**
- **We use Employment Information that is adequate, relevant and not excessive for the purpose for which it is processed;**
- **We keep it accurate and, as necessary, up to date;**
- **We keep it in a form which permits identification for no longer than necessary for the purpose for which it was collected;**
- **We protect it against accidental or unlawful destruction or accidental loss, alteration, unauthorised disclosure or access, using appropriate technical and organisational measures;**
- **We process it in accordance with an Individual's rights.**

#### **4. WHO IS YOUR EMPLOYMENT INFORMATION DISCLOSED TO?**

##### **(a) Within Cargill**

Cargill restricts access to Employment Information to people within the company who have a “need to know” that information. As a global company doing business across national borders, there are many situations where this “need to know” requires your information to be transferred to Cargill in another country, including countries that may provide no or less legal protection for Personal Information. However, the purpose of the Cargill Data Privacy for Employment Information Policy is to protect your Employment Information in every country where Cargill does business.

Cargill has implemented a legal mechanism known as ‘binding corporate rules’ to provide appropriate safeguards to protect Employment Information from the EEA and the UK when it is transferred to another Cargill company. A summary of our binding corporate rules for Employment Information may be found [here](#).

##### **(b) Outside Cargill**

Cargill shares Employment Information with authorised Third Party Service Providers, such as compensation and benefits providers that have a “need to know” that information. Where it does so, Cargill imposes appropriate contractual obligations regarding Employment Information on such Third Party Providers.

It is our practice to require Third Party Service Providers to implement other means of providing appropriate safeguards for Personal Information transferred from the EEA or the UK where appropriate.

Beyond our Third Party Service Providers, generally, Cargill will only disclose your Employment Information outside Cargill and its Service Providers:

- when required to do so by law;
- in response to a legitimate request for assistance by the police or other law enforcement agency;
- to seek legal advice from Cargill’s external lawyers or in connection with litigation with a third party;
- in connection with the sale, purchase or merger of a business; or
- to provide a third party (such as a potential supplier or customer) with a means of contacting you in the normal course of business, for example, by providing your contact details, such as your business phone number and email address.

#### **5. EXERCISING YOUR RIGHTS**



If you would like a copy of any of your Employment Information, or if you would like to update or correct it, please use [this form](#).

If you have a concern about how Cargill has used your Employment Information, as a first step, you should raise the concern in writing with your manager. If this is not appropriate for any reason, you should raise the concern in writing with your Local Privacy Champion or the Global Privacy Office, whichever is most appropriate.

If your manager has not been able to resolve your concern within a reasonable period of time, the concern may be escalated to the Local Privacy Champion responsible for the country (or region) where you are located.

If your concern has not resolved within a reasonable period of time, it can be escalated to the Global Privacy Office by using [this form](#).

After investigating an escalated concern, the Global Privacy Office will respond to you in writing within a reasonable time setting out its conclusions together with details of any remedial action that it proposes to take.

If your concern has not been fully resolved by the Global Privacy Office, you are entitled to lodge your concern with your local Data Privacy Authority or before the courts in your country where you may seek compensation from Cargill for loss or damage that you have suffered. For more details about how to do this and your entitlement to compensation, please see Annex 2 of [Cargill's Data Privacy for Employment Information Policy](#).

In some circumstances, you have a right to request the erasure of your Employment Information or a restriction of its use, to object to its use (including for direct marketing purposes), to receive it in a portable format or to have it transmitted to another organization. If you wish to exercise any of these rights, please use [this form](#).

You have the right to complain to your local Data Privacy Authority if you think we have processed your Employment Information in a manner which is unlawful or breaches your rights.

## 6. RETAINING YOUR EMPLOYMENT INFORMATION

We keep your Employment Information in accordance with Cargill's Record Retention Schedules which are available at <https://cargillonline.sharepoint.com/sites/RIMCOE/SitePages/Retention.aspx>.

## 7. CONTACT US

Cargill Global Privacy Office  
Law Department, MS 24  
Office Center  
15407 McGinty Road West  
Wayzata  
MN 55391-2399  
USA