

Privacy Policy

1. Introduction

This Data Protection Policy sets out how Dairygold Co-Operative Society Limited and its subsidiaries (the "Society" or "Dairygold") use, share and hold personal information collected about current, past and prospective, members, customers, suppliers, business contacts and other people in the course of its business activities. This Notice also outlines how Dairygold uses the personal data collected on our websites including www.coopsuperstores.ie, www.dairygoldagri.ie and www.dairygold.ie (the "Dairygold Websites").

We are committed to protecting your personal information in accordance with applicable laws, including, ePrivacy Directive, the EU General Data Protection Regulation no. 679/2016 (GDPR) and Irish Data Protection Acts 1988 to 2018 as amended from time to time.

We may make changes to this Privacy Policy at any time and for any reason. We will alert you about any changes by updating the "Last Updated" date of this Privacy Policy. Any changes or modifications will be effective immediately upon posting the updated Privacy Policy on our Site. You are encouraged to periodically review this Privacy Policy to stay informed of updates. You will be deemed to have been made aware of, will be subject to, and will be deemed to have accepted the changes in any revised Privacy Policy by your continued use of our Site after the date such revised Privacy Policy is posted.

If you have any queries in relation to this Privacy Policy, please contact the Society at:

Email address: dataprotection@dairygold.ie

Post address: Data Protection Officer, Clonmel Road, Mitchelstown, Co. Cork P67 DD36 Ireland

Telephone number: +353 (0)25 24411

2. Where are the sources of Personal Data

The Society's use of Personal Data includes Personal Data obtained from a variety of sources, including:

- Company forms and documentation.
- telephone calls, emails and other communications.
- Customer and milk supplier data submitted to the Society
- service providers, partners and other third parties including government Departments.
- the Dairygold website(s), member portal(s) and shared websites (the "Site"); and
- social media applications.

In this Privacy Policy, the Society refers to the Site and our social media applications collectively as our "Online Tools".

Personal Data may be provided to the Society by the individual directly or by a third party.

3. What personal information do we collect about you?

Dairygold may collect or generate the following categories of personal data about you as a member, supplier, customer, tenant or business contact of Dairygold:

Type of Personal Data	Examples
Information on Individuals	<ul style="list-style-type: none">• Contact and identification information (see below)

	<ul style="list-style-type: none"> • Government documents (see below) – for age and ID verification which may contain some or all of the following: gender, date and place of birth, physical characteristics, ID number. • Data Relating to Milk Supply (see below) • Financial Information (see below), details of payments • Marital and family status, details of beneficiaries on death of member or transfer of membership interest in the Co-Op • Status as Society officer or director, or partner, or other ownership or management interest in an organisation which is a member of the Co-Op • Marketing Preferences: Marketing Activities and Customer feedback (see below) • Government documentation. • Information from job applicants, including name, address, previous work experience
Contact & identification information	<ul style="list-style-type: none"> • Name, address, Eircode, email and telephone number, age, nationality and occupation. • Date of birth, PPS number, certified copies of proof of identity such as passport, drivers' licence, or utility bills where necessary. • Gender identification • Personal images
Data Relating to Milk Supply and/or Membership And/or Grain Supply	<ul style="list-style-type: none"> • Copy leases of land and/or Certificate of land ownership – to verify eligibility to become a Member/Supplier or for membership of the representative structure • Herd number, milk account number • Milk quality information • Verification of register of milk suppliers against register of members. • Details of your compliance with your milk supply agreement, Dairygold's milk purchasing policies and applicable health and safety legislation. • Details of your certification with Bord Bia SDAS audit • Department of Agriculture dairy hygiene audits • Details necessary to improve your farm efficiency, profitability and sustainability as part of our Grassroots Milk Supplier Sustainability Program and necessary to support your transition to more sustainable dairy farming, including water quality, protected urea, soil health, milk recoding and herd health.
Government	Social security number, passport number, tax number, driver's licence number, or other government issued identification number.
Financial information	<ul style="list-style-type: none"> • Payment card number (credit /debit card), bank account details, to facilitate payments to you by

	<p>Dairygold or from you to Dairygold and, where applicable, other financial information such as your credit limit, Society dividend and shareholding and Member funding</p> <ul style="list-style-type: none"> • Co-Op Superstore accounts linked to your credit account, • Related party information
Marketing preferences, marketing activities and customer feedback	Marketing preferences (including profiling by reference to your interests or business activities) or responses to customer satisfaction surveys.
Online activity information	The Society may receive Personal Data about an individual when they use Online Tools; this may include social media account identifiers, IP address and other online identifiers (to the extent that they are Personal Data), and other Personal Data that an individual may provide to the Society online.
Personal information received by Dairygold from other sources	<p>The Society and its service providers may also receive personal data about you from third party sources such as:</p> <ul style="list-style-type: none"> • State and semi-state authorities including Bord Bia, Teagasc and the Department of Agriculture, Food and the Marine, C.R.O., Friendly Societies, Register of Beneficial Ownership, Revenue Commissioners. • Industry stakeholders such as the Irish Cattle Breeding Federation (ICBF), ENFER, Progressive Genetics and Munster Bovine. • Third party providers where repayments are deducted from Supplier payments. • Other entities connected to your milk supply. <p>This includes information about your herd, sustainability of your farm and/or compliance with legislation</p> <ul style="list-style-type: none"> • Through your interaction on our website, we may also receive information about you from other entities. • We may link the data you provide to us, with other publicly available information about you that you have published on the Internet – this may include sources such as LinkedIn and other social media profiles. • We may search various databases – some publicly available and others not, which may include your personal data (include your CV or Resumé), to find possible candidates to fill Our job openings. Where We find you in this way, we will obtain your personal data from these sources. • We may receive your personal data from a third party who recommends you as a candidate for a

	specific job opening or for our business more generally.
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4. How do we use your Personal Data?

The Society uses Personal Data to carry out its business activities and to provide you with a comprehensive service. The purposes for which we use your Personal Data may differ based on the relationship.

The Society's business includes the following:

Processing Personal Data in the context of the Society's Membership, Milk and Grain Supply, Retail and Agri business, property related activities in order to:

- facilitate general business purposes, including administering our share register and membership, to facilitate election of the representative structure
- processing payments.
- facilitate sustainable farming
- provide products and services.
- maintain and improve the quality of products and services,
- provide training and maintain information security (for example, for this purpose the Society may record or monitor phone calls).
- imagery for promotional purposes including social media, Dairygold websites, press releases and annual reports
- comply with legal obligations in relation to our membership and milk and grain supply;
- communicate with individuals, members in respect of membership, support and services, facilitate communication between customers with a supplier or third-party advisors;
- administer participation in competitions, including those offered in conjunction with third parties.

In respect of the Society's operations generally, including and not limited to the above business activities, the Society also Processes Personal Data to:

- carry out research and analysis, including analysis of the Society's customer base or membership and other individuals whose Personal Data the Society collect;
- provide marketing information in accordance with preferences the individual has told the Society about (marketing information may be about products and services offered by third party partners subject to the individual's preferences);
- personalise the individual's experience when using Online Tools or visit third party websites by presenting information and advertisements tailored to the individual, and facilitate sharing on social media;
- manage the Society's business operations and IT infrastructure, in line with its internal policies and procedures, including those relating to finance and accounting, billing and collections, IT systems operation, data and the website hosting, data analytics, business continuity, records management, document and print management, and auditing;
- manage complaints, feedback and queries, and handle requests for data access or correction, or the exercise of other rights relating to Personal Data;
- comply with applicable laws and regulatory obligations; comply with legal process and court orders; and respond to requests from public and government authorities; and
- establish and defend legal rights to protect the Society's business operations, and those of its business partners

- verify your identity and securely log in to accounts to keep your personal data and passwords protected from cyber threats while shopping on Co-Op Superstores.ie including use of multi-factor authentication
- create and enhance your shopping experience when shopping online coopsuperstores.ie we may track your onsite movements and gather research in order for us to. Coopsuperstores.ie will also request that we track email activity across our platform and website and remarket + inform customers of offers and changes on the website.

All such activity is in line with G.D.P.R., this Policy and our Cookie policy.

5. What personal information do we share about you?

Dairygold may need to share Personal Data with third parties. When the Society provides Personal Data to third parties as Data Processors, the third parties will be selected carefully and required to use appropriate measures to protect the confidentiality and security of the Personal Data.

Type of third party	Examples
Service providers and advisors	External third party service providers, such as security professionals, accountants, auditors, experts, lawyers and other professional advisors; travel assistance providers; call centre service providers; parties providing research, advisory and education in dairy and agriculture, printing services, credit rating agencies, IT systems, support, processing and hosting service providers; advertising, marketing and market research, and data analysis service providers; banks and financial institutions that service the Society's accounts; document and records management providers; and other third party vendors and outsourced service providers that assist the Society in carrying out business activities.
Government / Judicial authorities & State Agencies	The Society may also share Personal Data with: (a) government, semi-State or other public authorities (including, but not limited to, courts, regulatory bodies, law enforcement agencies, tax authorities and criminal investigations agencies) to the extent Personal Data is required to be disclosed; and (b) third party participants in legal proceedings and their accountants, auditors, lawyers, and other advisors and representatives, as the Society believe to be necessary or appropriate.
Other third parties	Accountants, auditors, lawyers, tax advisers or advisers acting on behalf of relevant individuals; industry bodies; joint venture partners; financial institutions (in the context of sales of debts or loans); insurance companies (in the context of legal claims or proceedings),

TRANSFERS OF YOUR DATA

For the purposes set out in this Privacy Policy the Society may transfer Personal Data internationally to its service providers, business partners, and government or public authorities, some of whom may be located in other countries (including countries which have not been found by the European Commission to provide adequate protection for Personal Data).

When making these transfers, the Society will take steps to ensure that the Personal Data is adequately protected and transferred in accordance with Data Protection Law.

This may involve the use of data transfer agreements in the form approved by the European Commission, or another mechanism recognised by Data Protection Law as ensuring an adequate level of protection for Personal Data transferred outside the EEA (for example, the standard contractual clauses).

6. What legal basis allows us to collect user data?

We must have a legal basis (a valid legal reason) for using your personal data. Our legal basis will be one of the following:

- **Performance of Contract:** If you chose to purchase our goods or services, we process data necessary for the performance of a contract. Where you enter into a milk supply, grain supplier or other agreement with Dairygold. If you do not provide your personal data for these purposes, we will not be able to perform our contract with you.
- **Legal Obligation:** We also process data for compliance with a legal obligation (Art. 6(1)(c) GDPR) to which we are subject to ensure business administration, record keeping and compliance.
- **Legitimate Interest:** We primarily process your personal data because we have a legitimate reason to use it and this is reasonable when balanced against your human rights and freedoms.

Where the Society relies on its legitimate business interests or the legitimate interests of a third party to justify the purposes for using Personal Data, its legitimate interests include:

- pursuit of its commercial activities and objectives, or those of a third party (for example, by carrying out direct marketing and otherwise for the purposes set out in this policy);
 - compliance with any industry or regulatory guidelines or standards (for example, for the purpose of food safety);
 - improvement and development of business operations and service offering (including services to enhance on-farm sustainability), or those of a third party;
 - protection of the business, shareholders, employees and customers, or those of a third party (for example, ensuring IT network and information security, enforcing or defending claims, including debt collection); and
 - financing of the Society (e.g. sales of debts or loans);
 - analysing the Society's services (for example, by carrying out research, including market research).
- **Consent:** In limited circumstances, we may process your personal data based on your freely given consent. For example, when we send you promotional or direct marketing material, we do so on the basis of your consent.

You can withdraw your processing consent at any time by contacting us on the details set out in section 1 of this Policy. In the case of direct marketing, we will ask you in each marketing communication whether you want to "unsubscribe" or "opt-out". Please note that any processing carried out before you withdraw your consent will remain valid.

Processing of Personal Data relating to criminal convictions and offences is subject to the requirements of applicable law and is not Processed by the Society in the ordinary course unless such Personal Data is required to be Processed in the context of us performing, or entering into, a contract with you or where required for the investigation of a suspected criminal offence.

7. Monitoring

We may record your telephone calls so that the Society can:

- improve the standard of service that the Society provide by providing employees with feedback and training, where applicable; and
- address queries, concerns or complaints.

In the event that the Society records these calls, you shall be advised of this at the outset of the call.

The Society monitors electronic communications between the Society and third parties (for example, emails) to protect employees, the business and IT infrastructure, and third parties including by:

- identifying and dealing with inappropriate communications; and
- looking for and removing any viruses, or other malware, and resolving any other information security issues.

The use of CCTV involves processing of Personal Data. CCTV is used at entry and exit points at our premises which are identified by signage. CCTV images may be used to investigate a suspected criminal offence, such as theft, fraud, criminal damage or assault or any serious complaint or allegation received where the processing of such Personal Data is necessary and proportionate to the investigation of that complaint or allegation.

8. Retention of your Personal Data

The Society will keep Personal Data for as long as is necessary for the purposes for which the Society collects it. This means the Society will retain Personal Data for so long as we have a relationship with the individual to whom the Personal Data relates. Once this relationship comes to an end the Society will retain such Personal Data for a period of time that allows it to: (a) comply with legal record retention requirements; (b) defend or bring legal claims; (c) maintain records for business analyses and audit; and (d) address complaints and other issues regarding its business.

We also retain your data to maintain a trading history for reporting and member benefits for a period not less than [7 years] beyond your association with Dairygold.

Where the Society holds Personal Data to comply with a legal or regulatory obligation, the Society will keep the information for at least as long as is required to comply with that obligation. In some cases, a retention period will apply once the initial purpose has ceased e.g. payment files are required to be kept for current year plus 6 years.

Where the Society holds Personal Data in order to provide a product or service, the Society will keep the information for at least as long as the Society provides the product or service, and for a number of years thereafter. The number of years varies depending on the nature of the product or service provided.

For further information about the period of time for which the Society retains Personal Data, please contact the Society using the details in Section 1.

9. Security of Personal Data

The Society uses appropriate technical, physical, legal and organisational measures, which comply with Data Protection Law to keep Personal Data secure.

As much of the Personal Data the Society holds is stored electronically the Society has implemented appropriate IT security measures to ensure this Personal Data is kept secure. For example, the Society may use anti-virus protection systems, firewalls, and data encryption technologies. The Society have procedures in place at our premises to keep any hard copy records physically secure. The Society also train its staff regularly on data protection and information security.

When the Society provides Personal Data to a third party (including its service providers) or engages a third party to collect Personal Data on its behalf (Data Processor), the third party will be selected carefully and required to use appropriate security measures to protect the confidentiality and security of Personal Data including entering into a Data Processor or Data Sharing Agreement as appropriate.

Unfortunately, no data transmission over the Internet or electronic data storage system can be guaranteed to be 100% secure. If an individual has reason to believe that their interaction with the Society is no longer secure (for example, if they feel that the security of any Personal Data sent to the Society has been compromised), they should immediately notify the Society.

10. Your Rights

You have a number of rights in relation to your personal data, which are set out below. Please note that in certain circumstances these rights may not be absolute:

- right of access: you are entitled to receive a copy of your personal data which we hold.
- right to rectification: you can request that we amend any inaccurate personal data that we have about you.
- right to erasure: you can request us to erase the personal data we hold about you in certain circumstances.
- right to restriction of processing: you can request that we restrict our processing of your personal data in certain circumstances.
- right to data portability: you can request your personal data be provided to you in a structured, commonly used, and machine-readable format and have your personal data transmitted to another controller in certain circumstances where it is technically feasible.
- right to object: you can object at any time where we process your personal data. However, the Society may continue to use your Personal Data, despite your objection, where there are compelling legitimate grounds to do so, or the Society needs to use the Personal Data in connection with any legal claims.

If you would like to exercise any of these rights or have any questions or concerns about how we use your personal information, please contact us at the contact details in Section 1 above. We will provide you with information on any action taken upon your request in relation to any of these rights without undue delay and at the latest within one month of receiving your request. We may extend this up to 2 months if necessary; however, we will inform you if this arises. Please note that we may ask you to verify your identity when you seek to exercise any of your data protection rights. You also have the right to lodge a complaint with the Data Protection Commission. For further information, see www.dataprotection.ie.

Date: 1 July 2025