



## PRIVACY STATEMENT FOR ETHICS HOTLINE

### 1. Introduction

Thank you for visiting the Ethics Hotline, a SpeakUp web service provided by People Intouch B.V. People Intouch serves as a processor of data on behalf of Yara International ASA ("Yara"), who are responsible (as 'controller') for the processing of personal data by means of the Ethics Hotline. The Ethics Hotline is not intended to leave sensitive personal data such as race, health data, political views, philosophical beliefs (religious or atheist, etc.), sexual preference or legal past. The security of our visitor's privacy is important to us. We want you to feel safe while using our Ethics Hotline and ask you to acknowledge the following information concerning the collection of personal data.

### 2. Legal basis processing

Processing of (personal) data via the Ethics Hotline is necessary for compliance with a legal obligation to which the Yara is subject to and for the legitimate interests of Yara (as data controller) to have a safe system to detect misconduct that otherwise would never be detected. Yara do not require consent for its processing activities from you (as being the data subject). This is not a relevant legal ground in respect of employees given the dependency that results from the employer/employee relationship.

### 3. Data Security

Both Yara and People Intouch are committed to protecting your privacy and comply with privacy laws and regulations. People Intouch providing the Ethics Hotline on behalf of Yara has taken extensive measures to prevent the loss, misuse and alteration of your personal data. All data on the Ethics Hotline is encrypted and stored within the Netherlands. All communication via the Ethics Hotline is encrypted.

### 4. Use of Information

The Ethics Hotline allows you to report any kind of misconduct, unlawful or unethical behaviour within the workplace or within the business relations with Yara. The information you provide is treated with strict confidentiality and the report is reviewed by the dedicated Ethics & Compliance personnel. Such a review includes processing of information you provide in order to substantiate and assess the details and facts about the reported incident. This in return will give us possibility to respond to your report and to define the rectification measures that improve our internal processes and avoid similar situation in the future. Yara do not share this information with any third party other than People InTouch that provides the Ethics Hotline and the processing of the information takes place within the EEA. The data is only stored in the Ethics Hotline and is deleted from the system as soon as the outcome of report is concluded (closure of the case).

People InTouch use certain technical information (e.g. IP address) to prevent and detect security threats or other malicious activity. This data will never be used for any other purpose and will be deleted after 2 weeks, unless this period is extended due to an established act of malicious activity. Neither People InTouch nor Yara use cookies or tracking tools.

### 5. Your rights

Yara as data controller is responsible for assuring your rights as being a data subject. You can request to:

- **Access** the personal data concerning you. Please note, that you can always access the whole content of the message you have left on the SpeakUp web or phone service via the unique access code;
- **Rectify (correction)**, without undue delay, inaccurate personal data concerning you;
- **Erase ('right to be forgotten')** personal data concerning you without undue delay;



- **Restrict** the processing if: (a) you contest the accuracy of the personal data being processed, (b) the processing is unlawful and you oppose the erasure of your personal data and requests the restriction of their use instead, (c) Yara, as being the data controller, no longer needs your personal data for the purposes of the processing, but you have required them for the establishment, exercise or defence of legal claims, and (d) you object to processing pending the verification whether the legitimate grounds of the data controller (Yara) overrides yours;
- **Object** to (a) processing based on legitimate interests (referred to in section 0.2 above) or the performance of a task in the public interest/exercise of official authority (including profiling), (b) direct marketing (including profiling); and (c) processing for purposes of scientific/historical research and statistics.

Furthermore, you have the right to lodge a complaint with the (public) supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement.

## 6. Modifications

Yara may update this Privacy Statement from time to time to meet Yara's business requirements and/or comply with statutory provisions. You can see the date of the latest update at the bottom of this Privacy Statement. If we make material or substantive changes to the Privacy Statement, we will notify you by email to actively bring those changes to your attention.

## 7. General

This Privacy Statement reflects how personal data is processed in the Ethics Hotline, and is not a contract. Questions regarding this statement or our website should be directed to the following email address: [ethics@yara.com](mailto:ethics@yara.com)

Or you may call or send a letter to:

Yara International ASA  
Drammensveien 131  
0277 Oslo - Norway  
Tel:+47 24 15 70 00

Email: [ethics@yara.com](mailto:ethics@yara.com)

If you have any questions regarding People Intouch's processing of personal data in the Ethics Hotline, contact:

People Intouch B.V.  
Olympisch Stadion 6  
1076 DE Amsterdam  
The Netherlands  
Phone: +31 20 673 10 35