



## **Rich Products Corporation EU Safe Harbor Policy**

### **Introduction**

Rich Products Corporation ("Rich's") is a global food manufacturer, based in the US, with affiliates in the UK, Asia, and Latin America.

**U.S. - EU Safe Harbor Privacy Statement** For personal information of associates and customers that Rich Products Corporation receives from the European Union, Rich's has committed to handling such personal information in accordance with the Safe Harbor Principles. For more information about the Safe Harbor Principles, please visit the U.S. Department of Commerce's Website at <http://export.gov/safeharbor/>.

Rich's adheres to the Safe Harbor Agreement concerning the transfer of personal data from the European Union ("EU") to the United States of America. Accordingly, we follow the Safe Harbor Principles published by the U.S. Department of Commerce (the "Principles") with respect to all such data. If there is any conflict between the policies in this privacy policy and the Principles, the Principles shall govern. This privacy policy outlines our general policy and practices for implementing the Principles, including the types of information we gather, how we use it and the notice and choice affected individuals have regarding our use of and their ability to correct that information. This privacy policy applies to all personal information transferred to Rich's whether in electronic, paper or verbal format.

### **Definitions**

"Personal Information" or "Information" means information that (1) is transferred from the EU to the United States; (2) is recorded in any form; (3) is about, or pertains to a specific individual; and (4) can be linked to that individual.

### **Principles**

#### **Notice**

Rich's shall inform an individual of the purpose for which it collects, uses, and discloses Personal Information. Rich's shall provide the individual with the choice and means for limiting the use and disclosure of his/her Personal Information. Notice will be provided in clear and conspicuous language when individuals are first asked to provide Personal Information to Rich's, or as soon as practicable thereafter, and in any event before Rich's uses or discloses the Information for a purpose other than for which it was originally collected.

#### **Choice**

Rich's will offer individuals the opportunity to choose (opt out) whether their Personal Information is (1) to be disclosed to a third party or (2) to be used for a purpose other than the purpose for which it was originally collected or subsequently authorized by the individual.

#### **Onward Transfers**

Rich's may store Personal Information on servers in the US or UK. Rich's does not sell Personal Information.

#### **Data Security**

Rich's shall take reasonable steps to protect the Information from loss, misuse and unauthorized access, disclosure, alteration and destruction. Rich's has put in place appropriate physical, electronic and managerial procedures to safeguard and secure the Information from loss, misuse, unauthorized access or disclosure, alteration or destruction. Rich's cannot guarantee the security of Information on or transmitted via the Internet.

### **Data Integrity**

Rich's shall only process Personal Information in a way that is compatible with and relevant for the purpose for which it was collected or authorized by the individual. To the extent necessary for those purposes, Rich's shall take reasonable steps to ensure that Personal Information is accurate, complete, current and reliable for its intended use.

### **Access**

Rich's shall allow an individual access to his/her Personal Information and allow the individual to correct, amend or delete inaccurate information, except where the burden or expense of providing access would be disproportionate to the risks to the privacy of the individual in the case in question or where the rights of persons other than the individual would be violated.

### **Enforcement**

Rich's uses a self-assessment approach to assure compliance with this privacy policy and periodically verifies that the policy is accurate, comprehensive for the information intended to be covered, prominently displayed, completely implemented and accessible and in conformity with the Principles. We encourage interested persons to raise any concerns using the contact information provided and we will investigate and attempt to resolve any complaints and disputes regarding use and disclosure of Personal Information in accordance with the Principles.

If a complaint or dispute cannot be resolved through our internal process, we agree to dispute resolution using an independent resource mechanism as a third party resolution provider.

### **Amendments**

This privacy policy may be amended from time to time consistent with the requirements of the Safe Harbor. We will post any revised policy on this website.

### **Information Subject to Other Policies**

The Company is committed to following the Principles for all Personal Information within the scope of the Safe Harbor Agreement. However, certain information is subject to policies of the Company that may differ in some respects from the general policies set forth in this privacy policy.

### **Contact Information**

Questions, comments or complaints regarding the Company's Safe Harbor Policy or data collection and processing practices can be mailed or emailed to:

Rich Products Corporation  
Attn: Legal Department  
One Robert Rich Way  
Buffalo, NY 14075