

INFORMATION NOTICE - NEWSLETTER

The companies of the Irca group wish to inform you about the processing of your personal data carried out to respond to your request to subscribe to the newsletter, collected by filling in the newsletter form on the website www.ircagroup.com.

Where EU Regulation 679/2016 (hereinafter, "GDPR") is applicable, this information is to be understood pursuant to Article 13 of the GDPR.

1. Identity and contact details of the data controllers



With respect to the processing purposes indicated in this policy, the companies of the Irca Group indicated in the following table act jointly as joint data controllers.

Country	Entity	Registered Office
Australia	IRCA Pty Ltd	Level 1, 35 Outram Street - West Perth, WA 6005
Belgium	Dobla Belgium Productions N.V.	Lindekensbaan (Kessel) 91A, 2560, Nijlen, Belgium
Belgium	Dobla Beheer	Galileistraat 26, 1704SE Heerhugowaard Belgium
Belgium	Dobla BV	Galileistraat 26, 1704SE Heerhugowaard Belgium
Belgium	Dobla Logistics	Riyadhstraat 21 2321 Hoogstraten Belgium
Belgium	Dobla Belgium Productions	Lindekensbaan(Kessel) 91A 2560 Nijlen Belgium
Brazil	IRCA Brasil Serviços Administrativos LTDA	Rua Conselheiro Brotero 528, Barra Funda, Sao Paulo, Brazil
China	IRCA (Shanghai) Trading Co. Ltd	Room 466, Area B, 4th floor, No. 452 Daduhe Road, Shanghai
France	IRCA France SAS	29 Rue du Pont - 92200 Neuilly Sur Seine,
France	AI Charlie French Bidco SAS	428, Route de Ravifruit, 26140 Anneyron
Germany	IRCA Manufacturing Germany	Neckarstrasse 9, 65239 Hochheim am Main,
Hong Kong	Dobla Chocolate Innovations HK Ltd	11/F., Unit B, Winbase Centre, 208 Queen's Road Central, Sheung Wan, Hong
Ireland	AI Charlie Irish Bidco Limited	3 Dublin Landings, North Wall Quay, Dublin 1, Ireland
Italy	IRCA S.p.A.	Via degli Orsini 5, Gallarate (VA)
Italy	IRCA Distribuzione	Via Irlanda 6, Gallarate (VA)
Italy	Benetti Distribuzione	Vigonza (PD) – Via Ugo Foscolo 24
Italy	Cesarin S.p.A.	via Moschina 3, Montecchia di Crosara (VR), 37030
Italy	Anastasi S.r.l.	Bronte (ct) viale j. Kennedy z. Artigianale 79
The Netherlands	Dobla Beheer BV	Galileistraat 26, 1704 SE Heerhugowaard
The Netherlands	Dobla BV	Galileistraat 26, 1704 SE, Heerhugowaard,
Spain	Irca Spagna Corp S.l.	PJ Merce Rodoreda Num 10-12 Local 1 Duplex (Castelldefels)

Poland	Ashanti Atelier	Ul. Henryka Sienkiewicza 82-84 Łódź, łódzkie, 90-318 Poland
UAE	IRCA MEA Trading LLC	Office 1501, Single Business Tower - Sheikh Zayed Rd - Business Bay - Dubai
United Kingdom	IRCA Manufacturing UK	"Airfield Industrial Estate, Pocklington, York, YO42 1NR"
USA	Dobla Holding USA Inc.	C/o Doblas and In2food 1775 Breckinridge Pkwy, Ste 600 - Duluth, GA 30096
USA	Dobla Group USA LLC	1775 Breckinridge Pkwy, Ste 600 - Duluth, GA 30096
USA	in2food gourmet LLC	1775 Breckinridge Pkwy, Ste 600 - Duluth, GA 30096
USA	IRCA Group USA LLC	c/o The Corporation Trust Company, 1209 Orange Street, Wilmington, County of New Castle, Delaware 19801 USA
Vietnam	Dobla Asia Company Ltd	My Xuan B1-Conac Industrial Zone, My Xuan Ward, Phu My Town, Ba Ria - Vung Tau Province, Vietnam

(hereinafter, jointly referred to as the "Joint Controllers").

The Joint Controllers can also be contacted at the e-mail address privacy@ircagroup.com.

2. Data processing purposes, legal basis and data retention



Why is your personal data being processed?	What is the basis that makes the processing lawful?	How long do we keep your personal data?
To send, by e-mail, to those who explicitly request it by filling in the newsletter subscription form, commercial communications and advertising material on the latest news, products and services of the Joint Controllers or reporting initiatives and events, such as participation in fairs and congresses, satisfaction questionnaires, as well as carrying out statistical and/or market research.	The legal basis is represented by consent, optional and withdrawable at any time, given by the data subject by subscribing to the newsletter.	For 4 years, without prejudice to the right to unsubscribe from the newsletter service, also by clicking on the <i>unsubscribe</i> link in each email or in the personal area of the website www.ircagroup.com .
Once the aforementioned time periods have elapsed, the data will be destroyed or anonymized consistent with the technical procedures for deletion and back-up, without prejudice to Joint Controllers' purpose of protecting their rights and interests, including from an accountability perspective.		

3. Data provision

We would like to inform you that the provision of data marked with an asterisk (*) is necessary; therefore, any refusal to provide them will result in the impossibility of following up on your registration request.



4. By whom the data are processed and to whom they are transmitted

Your data are processed by employees and/or collaborators of the Joint Controllers, expressly authorized and instructed to process the data.

Your data are processed, on behalf of the Joint Controllers, by third parties who provide performance or services instrumental to the purposes outlined in this policy, to whom appropriate operational instructions are given and designated as data processors (such as, for example, the website company and marketing agencies and companies that offer *mass mailing* services and website maintenance).

Your data may be processed by third parties acting as autonomous data controllers entitled to receive the data, such as distributors, public authorities or professional firms.

5. Data transfer

Your data may be transferred by European Joint Controllers to countries outside the European Union (EU) or the European Economic Area (EEA). Where such countries have not been deemed adequate by the European Commission through a decision under Art. 45 of the GDPR, the "transfer tools" referred to in Art. 46 of the GDPR (such as standard contractual clauses) will be used, assessing whether "additional measures" are in place to ensure a level of protection substantially equivalent to that required by EU law.



6. Rights of the data subject

Data subjects may exercise the following rights against each Joint Controller:

- i) request access to data concerning them and information relating to the purposes of the processing, categories of personal data, etc.;
- ii) request the deletion of data if the Joint Controllers no longer have the right to process them;
- iii) obtain the rectification of inaccurate data or the integration of incomplete data;
- iv) obtain the limitation of processing (i.e. the temporary subjection of the data to the sole storage operation);
- v) receive the data in a structured, commonly used and machine-readable format and transmit those data to another controller without hindrance from the controller to which the personal data have been provided (portability right);
- vi) withdraw any consent given at any time and object to receiving commercial communications also by clicking on the *unsubscribe* link at the bottom of each e-mail, or through the personal area of the website;
- vii) access to the essential content of the Joint Controllers agreement mentioned in paragraph 1 above.

These rights can be exercised by sending a communication to each Joint Controller at the contact points indicated in paragraph 1 or to the e-mail address at privacy@ircagroup.com

Finally, data subjects have the right to lodge a complaint with the competent supervisory authority in the Member State in which they habitually reside or work or in the State in which the alleged violation occurred.