

# Privacy Policy

At Oatly we believe in the importance of protecting personal information and an individual’s right to privacy and integrity.

This privacy policy explains how and why we collect and use your personal data when you are in contact with us. It also outlines your rights and how you can exercise them.

You are always welcome to contact us if you have any questions.

## Who is responsible for the personal data we collect?

Oatly EMEA AB (559163–7698), Stora Varvsgatan 6a, 211 19 Malmö, Sweden, is the data controller responsible for the processing of personal data described in this privacy policy.

## What is personal data and what constitutes the processing of personal data?

Personal data refers to any information that can be linked directly or indirectly (together with other information) to a natural, living person. This means that information such as name and contact details, images, audio recordings, IP addresses and competition entries is classified as personal data if it can be linked to a natural person.

Any action taken with personal data is called processing, regardless of whether it is carried out in an automated manner or not. Examples of common processing procedures are collection, recording, organization, structuring, storage, adaptation, transfer or erasure.

## What personal data do we collect about you and for what purpose (why)?

Purpose	Processing that is carried out	Category of personal data
To assess applications for published job vacancy and to determine whether we would like to offer you a position at Oatly.	<ul style="list-style-type: none"><li>• Collection of applications and the appraisal/disposal in relation to the requirements in job advert</li><li>• Collection of data from third parties and public sources, such as Facebook and LinkedIn</li><li>• Review and selection of applicants for interview</li><li>• Candidates are called for an interview</li><li>• Potential tests of candidates and reference checks</li><li>• Selection of candidate</li></ul>	Oatly has no specific requirements regarding which personal data that is to be included in an application. The personal data processed normally includes: <ul style="list-style-type: none"><li>• Name</li><li>• Contact details (address, e-mail and telephone number)</li><li>• CV data (such as current work position and any photos included therein)</li><li>• Test results</li><li>• Data published on social media</li><li>• Input from references</li></ul>
<b>Legal basis:</b> The processing is necessary in order to take steps prior to possibly entering into a (employment) contract with you.		
<b>Storage period:</b> The application documents of dismissed candidates are stored until the expiration of the applicable appeal period, for example in accordance with anti-discrimination legislation.		

<b>Purpose</b>	<b>Processing that is carried out</b>	<b>Category of personal data</b>
To handle incoming spontaneous applications/ letters of interest and save applications and other data for future recruitment processes.	Applications/letters are stored in order to be matched against future open positions. Furthermore, applications and other data collected in relation to a specific recruitment process (regarding a position which has been assigned to another applicant) may be stored in order to be matched against future open positions.	Oatly has no specific requirements regarding which personal data that is to be included in spontaneous job application. The personal data processed normally includes: <ul style="list-style-type: none"> <li>• Name</li> <li>• Contact details (address, e-mail and telephone number)</li> <li>• CV data (such as current work position and any photos included therein)</li> <li>• Test results</li> <li>• Data published on social media</li> </ul>
<b>Legal basis:</b> The consent given by you to the processing.		
<b>Storage period:</b> We will retain your personal data until you withdraw your consent. However, we will under all circumstances delete your personal data if the purpose behind our processing of such data ceases.		

<b>Purpose</b>	<b>Processing that is carried out</b>	<b>Category of personal data</b>
To offer you as a board member or an auditor access to information through our board portal.	<ul style="list-style-type: none"> <li>• Creating a user account</li> <li>• Access control</li> <li>• Notification, when new data has been uploaded to the portal</li> <li>• Storage of data</li> </ul>	<ul style="list-style-type: none"> <li>• Name</li> <li>• Social security number</li> <li>• Company</li> <li>• Title</li> <li>• Contact information (e.g. e-mail, address, phone number)</li> </ul>
<b>Legal basis:</b> Legal obligation to provide board members and auditor(s) with necessary information about the company, and our legitimate interest to facilitate the provision of financial and corporate information.		
<b>Storage period:</b> As long as your assignment is going on and then until limitation periods for legal action expire.		

<b>Purpose</b>	<b>Processing that is carried out</b>	<b>Category of personal data</b>
To handle the necessary contact information regarding our customers and suppliers.	<ul style="list-style-type: none"> <li>• Collection of contact information</li> <li>• Use of contact information</li> <li>• Storage of contact information</li> </ul>	<ul style="list-style-type: none"> <li>• Name</li> <li>• Position</li> <li>• Company</li> <li>• Contact information (e.g. e-mail, company address, phone number)</li> </ul>
<b>Legal basis:</b> Contractual obligations (if you have entered into a contract with us personally) or our legitimate interest to maintain and administer a contractual relationship between your company and us (if you are our contact person).		
<b>Storage period:</b> Stored during the time of the contract with you or your company, and for an additional period of maximum five years.		

### **From what sources do we retrieve your personal data?**

In addition to the information you provide us or that we collect from you based on your purchases and how you use our services, we may also collect personal data from someone else (third party). The data we collect from third parties is address details obtained from public records in order to verify your address.

### **Who do we share your personal data with?**

We may share your personal data with our trusted subcontractors to the extent necessary for us to achieve the purpose of the processing of your personal data. The subcontractors may need access to the personal data in their assignment for us, but they will not be allowed to use the personal data for any other purpose. Furthermore, other companies within the Oatly group of companies and certain of our service providers, including providers of IT-systems, may be given access to your personal data.

We may engage a data processor for processing of personal data on our behalf. We are responsible for ensuring that the data processor's processing complies with the legal requirements applicable to the processing.

Personal data may be disclosed by us in order to (i) comply with legal requirements or other requirements from official authorities, (ii) safeguard our legal interests, or (iii) detect, prevent, or draw attention to frauds or other safety or technical issues.

### **Where do we process your personal data?**

Personal data may be transferred between different companies within our group.

We always strive for the processing of your personal data to take place within the EU/EEA. However, we may be required to transfer the data to a non-EU/EEA country, for example if we share your personal data with a data processor who, either themselves or through a sub-supplier, is established or stores data in a non-EU country. In this case, the data processor shall only be granted access to data relevant to the purpose. Regardless of the country in which your personal data is processed, we take all the necessary legal, technical and organizational measures to ensure that the level of protection is the same as within the EU/EEA.

In cases where personal data is processed outside the EU/EEA, the level of protection is guaranteed either by a decision of the EU Commission that the country concerned ensures an adequate level of protection or through the use of so-called appropriate safeguards. Examples of appropriate safeguards are: Approved code of conduct in the destination country, standard contract clauses or Binding Corporate Rules (BCRs).

### **How long do we store your personal data?**

We will never store your personal data beyond what is necessary for each purpose. Please refer to the specific storage period for each purpose above.

### **What are your rights as data subject?**

Right of access (Subject Access Request). We are always open and transparent about how we process your personal data, and if you require further information regarding which personal data we process about you in particular, you can request access to a copy of the data. Please note that if we receive a subject access request, we may ask for additional data to ensure the effective handling of your request and that the information is given to the correct person.

Right to rectification. If your personal data is incorrect, you may request its correction. Within the stated purpose, you also have the right to supplement any incomplete personal data.

Oatly may also, on its own initiative, correct, disassociate, delete or supplement data that is found to be incorrect, incomplete or misleading.

Right to erasure. You may request the deletion of the personal data we process about you if:

- The data is no longer necessary for the purposes for which it has been collected or processed.
- You oppose a balance of interest that we have made based on a legitimate interest, and your reason for the objection weighs heavier than our legitimate interest.
- The personal data is processed in an unlawful way.
- The personal data must be deleted to comply with a legal obligation we are subject to.

Please note that we may have the right to deny your request if the processing is necessary for us to determine, enforce or defend legal claims. Should we be prevented from meeting a request for deletion, we will instead block personal data from being used for purposes other than the purpose that prevents the requested deletion.

Right to withdraw consent. If we process personal data based on your consent, you have the right to withdraw the consent at any time through a written notice to us.

Right to restriction. You have, in some cases, the right to demand that the processing of your personal data is limited. By limitation, it means that the data is marked so that in future it will only be processed for certain limited purposes.

The right to restriction applies, inter alia, to the fact that the data is incorrect and relates to a request for it to be corrected. In such cases, you may also request that the data processing is restricted during the time that the data is being corrected.

If processing is restricted, we may, in addition to storage, only process the data in order to apply or defend legal claims to protect someone else's rights or if you have given your consent.

Right to data portability. If our right to process your personal data is based on your consent or performance of an agreement with you, you have the right to request for the data that relates to you and which you have provided to us to be transferred to another data controller (so-called data portability). A prerequisite for data portability is that the transfer is technically feasible and can be automated.

### **How do we handle personal identity numbers?**

We will only process your personal identity number when motivated by the purpose, necessary for a secure identification or if there is any other worthy reason. We always minimize the use of your personal identity number as much as possible.

### **How is your personal data protected?**

We have taken appropriate technical and organizational security measures to protect your personal data against unlawful and unauthorized processing, e.g. we use IT systems to protect the privacy, integrity and availability of personal data for which we are data controller.

### **The Swedish Data Protection Authority is the supervisory authority. What does this imply?**

Should you be dissatisfied with our processing of your personal data, please let us know, and we will do our best to meet your complaints. Should we, in your opinion, fail to do so, please note that you

are also entitled to lodge a complaint with the Swedish Data Protection Authority, which is responsible for monitoring the application of the legislation. If a person believes that a company is handling personal data incorrectly, they can file a complaint with the Swedish Data Protection Authority.

### **Contact**

Please do not hesitate to contact us at [info@oatly.com](mailto:info@oatly.com) if you have any questions regarding this privacy policy, the processing of your personal data, or if you wish to request subject access. We may be required to make changes to our privacy policy. The latest version of our privacy policy is always available on our website.