

Data Protection and Privacy Policy

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We, SEEDVAL SRL, CUI R047792802, with registered office in Galați county, Galați municipality, str. Constantin Brâncoveanu nr. 5, Romania, are a trading company supplying sunflower seeds, sunflower kernels, flax seeds, chickpeas and sorghum, as well as other agricultural commodities, to food and feed manufacturers across Europe.

1. Purpose and scope

This Policy explains how SEEDVAL SRL, acting as data controller, processes personal data in the course of its business, in accordance with Regulation (EU) 2016/679 (GDPR) and Romanian Law no. 190/2018 on implementing measures for the GDPR.

It applies to the personal data of representatives, contact persons, drivers and other individuals acting for our customers, suppliers, carriers, storage operators, customs agents and other business partners, as well as of individuals who contact us directly. The processing of our employees' personal data is governed by Section 10 of the SEEDVAL Labour and Human Rights Policy; the obligations of suppliers who process personal data received from us are set out in Section 13 of the SEEDVAL Supplier Code of Conduct.

This Policy is a standing document: it is published in the same manner as our other policies, applies to all our business relationships while it is in force, and is referenced in the data protection clauses of SEEDVAL SRL's commercial contracts.

2. Personal data we process

In our ordinary business we process only the personal data needed to conclude and perform contracts and deliveries: identification and contact data of counterparties' representatives and contact persons (name, position, business e-mail, business telephone); data appearing in contracts, powers of attorney, invoices, transport and customs documents (including drivers' names and vehicle registration numbers on CMR consignment notes); bank account details of individual counterparties, where applicable; and business correspondence. We do not process special categories of personal data, and we do not collect personal data that is not necessary for these purposes.

3. Purposes and legal bases

We process personal data exclusively for the following purposes and on the following legal bases:

- **Performance of contracts** — negotiating, concluding and performing contracts and deliveries, including logistics and payment (art. 6(1)(b) GDPR);
- **Legal obligations** — accounting, tax, customs, food- and feed-safety traceability and other record-keeping obligations under EU and Romanian law (art. 6(1)(c) GDPR);
- **Legitimate interests** — ordinary business communication, management of the business relationship, establishment and defence of legal claims, and the security of our premises, systems and goods (art. 6(1)(f) GDPR).

We do not use personal data for direct marketing without prior consent, we do not sell personal data, and we do not take decisions based solely on automated processing, including profiling.

4. Disclosure and transfers

Personal data is disclosed only where necessary for the purposes above: to service providers acting on our behalf or in the supply chain (carriers, storage operators, customs agents, banks, IT and accounting providers), bound by confidentiality and data protection obligations; and to public authorities where the law requires it. Where data is transferred to counterparties outside the EU/EEA (for example, suppliers in the Republic of Moldova), the transfer is made only as necessary for the performance of the contract or with appropriate safeguards, in accordance with Chapter V of the GDPR.



5. Retention

We keep personal data only as long as necessary: for the duration of the business relationship and, thereafter, for the retention periods required by law (in particular the periods applicable to accounting, tax and customs records) or needed for the establishment or defence of legal claims. When these periods expire, the data is deleted or anonymised.

6. Security

We protect personal data with appropriate technical and organisational measures, including access control, data minimisation and the protection of data in transmission (encryption where appropriate). Personal and confidential data must not be transmitted or posted through any channel without adequate protection. Access to personal data is limited to the persons who need it for their work.

7. Your rights

Every individual whose data we process has the rights provided by the GDPR: access to their data, rectification, erasure, restriction of processing, data portability, and the right to object to processing based on legitimate interests. Requests may be addressed to office@seedval.com and are answered without undue delay and at the latest within one month. Individuals also have the right to lodge a complaint with the Romanian supervisory authority (ANSPDCP, www.dataprotection.ro).

8. Data breaches

Any suspected personal data breach is assessed immediately. Where required by art. 33 GDPR, we notify the supervisory authority without undue delay and, where feasible, within 72 hours of becoming aware of the breach, and we inform the affected individuals where the breach is likely to result in a high risk to their rights and freedoms.

9. Responsibility, communication and review

Given the nature, scope and purposes of our processing, SEEDVAL SRL is not required to designate a data protection officer under art. 37 GDPR. Daniela Plesca, CEO, is responsible for the implementation of this Policy and for data protection compliance at SEEDVAL SRL. The Policy is communicated to all employees, is available to business partners, and is reviewed at least once a year and whenever legislation or our operations change significantly.

Approved by: Daniela Plesca, Chief Executive Officer

Date: 03.08.2026 Signature: _____

