

PRIVACY STATEMENT

MERIDIA VERIFY

This privacy statement explains how Meridia (Meridia Land B.V.; Dutch Chamber of Commerce 62431331; "Meridia", "we", "us", "our") treats personal data in the context of our digital agriculture service 'Meridia Verify'. Meridia Verify is Meridia's data quality verification solution to reach full traceability and due diligence compliance, in view of legislation to prevent deforestation and forced labour. This Privacy Policy applies to the processing of smallholder farmers data by Meridia in the context of Meridia Verify.

Meridia is the responsible party (data controller) for the processing activities described in this Privacy Statement. We process your personal data for the following purposes: performing tests on smallholder farmers data to facilitate other businesses to accelerate their sustainability and ESG commitments and comply with the Regulation of the European Union on deforestation-free products. These processing purposes and related processing grounds are further specified below.

1 **For what data processing activities does Meridia process personal data?**

In the context of our digital agriculture services for Meridia Verify, we process your personal data in various ways. We have categorized our processing activities as follows:

- I. Building our Meridia Verify database;
- II. Performing data quality verifications for our clients.

2 **About whom does Meridia process personal data?**

Category	Explanation
Smallholder farmers	Food producing smallholder farmers located in various countries outside of the European Union that have secured land titles. These countries include: Ghana, Indonesia, Cote d'Ivoire, Cameroon
Aggregators	We use aggregator as the universal reference to Cooperative, Farmer group, Trade agent, Licensed buying company, Licensed buying agent, Town collector, or similar.

3 **How does Meridia obtain your personal data?**

Meridia has obtained the personal data by the following means of collection:

- **Our clients' data sets.** We obtain smallholder farm supply chain datasets from our clients.
- **Data collection.** We collect smallholder farm supply chain data on behalf of our clients.
- **Third party sources.** We obtain information about you from third parties. For example, we may request information from public sources, such as the Trade Register of the Chamber of Commerce, or professional social media platforms like LinkedIn.
- **Derived.** We may perform analysis on personal data about you. The resulting data can also qualify as personal data. For example, we may analyze which webpages on our website are visited most frequently.

Below, we have specified which categories of personal data of smallholder farmers we process and the source of these categories of personal data.

Category	Explanation	Source
Farmer IDs	We assign or obtain identification numbers to smallholder farm records.	Derived or obtained from smallholder farm supply chain datasets as obtained from our clients.
Names	We process names of smallholder farmers in order to prevent duplicates and assign farmer IDs.	Smallholder farm supply chain datasets as obtained from our clients.
Birthdate	We process birthdates of smallholder farmers in order to prevent duplicates and assign farmer IDs.	Smallholder farm supply chain datasets as obtained from our clients.
Number of farms owned	We analyze the numbers of farms to assign to the correct farmer ID if necessary.	Derived or obtained from smallholder farm supply chain datasets as obtained from our clients or other third party sources.
Geospatial farm data	Geographical location and size information of the farms.	Derived from smallholder farm supply chain datasets as obtained from our clients or other third party sources.
Farm location risks	We analyze risks regarding the farm locations such as protected forest areas.	Derived from smallholder farm supply chain datasets as obtained from our clients or other third party sources.
Temporal Data	We analyze risks relating to time series comparison of data categories above	Derived from smallholder farm supply chain datasets as obtained from our clients or other third party sources.

4 **Why does Meridia process your personal data?**

Processing purposes

In general, we may process your data for the following purposes:

- For maintenance, administration and network and security purposes;
- For internal control and business operations;
- For analyzing and improving our products;
- For handling any requests, complaints and disputes;
- For determining, exercising and defending our rights; and
- For complying with legal obligations (incl. fraud prevention) and requests of authorized governmental institutions.

More specifically, we process your data for:

- Building our Meridia Verify database; and
- Performing data quality verifications for our clients.

Processing grounds

In general, we may process your data based on a legal obligation. This means that we will process your data for as far as we are legally obliged to do so, for instance to comply with statutory minimum

retention periods. In certain cases, we may also ask for your consent. If we ask for consent to process your personal data, this is the legal processing ground. In other cases, we rely on our legitimate interests, as specified below.

Meridia processes these categories of personal data for the following purposes and based on the following legal grounds:

Data processing purpose	Legal basis
<p>I. Collecting, analyzing and verifying smallholder farmer data in our Meridia database.</p>	<p>Our legitimate interests to facilitate our clients to accelerate their compliance commitments including compliance with the Regulation of the European Union on deforestation-free products.</p>
<p>II. Performing independent data quality verifications for other businesses as a third party expert (for the purpose of possible audits by EU authorities or otherwise).</p>	<p>Our legitimate interests to facilitate our clients to accelerate their compliance commitments including compliance with the Regulation of the European Union on deforestation-free products.</p>

We only process personal data based on our legitimate interests for as far as such processing is necessary to achieve our purposes. We do not use more data than necessary. Furthermore, we make a balance of interests to assess whether we can rely on this legal processing ground. Only if the legitimate interests prevail over your privacy interests or other interests or fundamental rights, will we base our processing on this legal ground. You can contact us for more information on the legitimate interests in relation to a specific data processing activity.

5 With who does Meridia share your personal data?

Conditions for sharing your personal data

Third parties are not allowed to use your personal data, which we share with them, for their own direct marketing purposes. Moreover, we only share your personal data with third parties if:

- This is necessary for the provision of a service or the involvement of the third party. Sub-contractors will, for example, in principle only get access to the personal data that they require for their part of the service provision.
- The persons within the third party that have access to the personal data are under an obligation to treat the personal data confidentially. Where necessary this is also contractually agreed on.
- The third party is obliged to comply with the applicable regulations for the protection of personal data, for instance because we have concluded an agreement with this party. This includes that the party is obliged to ensure appropriate technical and organisational security measures, and that any transfer of personal data to countries outside the European Economic Area is adequately legitimized.

Parties with who we share your personal data

We may share your personal data on a need-to-know basis with the parties mentioned below. In this context, "need-to-know" means that a party only gets access to personal data if and insofar as this is required for the professional services provided by this party.

- Authorised persons, employed by Meridia, who are involved with the processing activity concerned. Such as, the Meridia employee you are in contact with.
- Authorised persons, employed by service providers / sub-contractors engaged by Meridia, who are involved with the processing activity concerned. Such as, service providers engaged by us.
- Authorised government institutions. Such as, courts, police, law enforcement agencies, tax-, customs- and excise duty offices, and audit regulators.

6 How does Meridia secure your data?

Protecting your privacy and personal data is very important to us. Therefore, we take appropriate security measures to protect your personal data and to prevent misuse, loss or alteration thereof. These comprise technical measures (e.g. logical and physical security) as well as organizational measures (e.g. promote privacy and security awareness among employees). Furthermore, the persons involved are bound by appropriate confidentiality obligations and must abide by our instructions aimed at the adequate protection of your data.

7 Your privacy rights

You have several privacy rights that you can exercise. The extent to which you can exercise these rights may depend on the circumstances of the data processing activities, such as how we process personal data and the legal basis for doing so. We will inform you if an exception or limitation applies.

In general, you have the following privacy rights:

- **Right to withdraw consent.** If our processing of your personal data is based on your consent, you have the right to withdraw such consent at any time (see the section 'What is our legal ground for processing your personal data?'). After you have withdrawn your consent, we may no longer process your personal data for the related purposes.
- **Right of access.** You have the right to request access to your personal data. This enables you to receive a copy of the personal data we hold about you (but not necessarily the documents themselves). We will then also provide you with further specifics of our processing of your personal data.
- **Right of rectification.** You have the right to request rectification of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected. However, this right is not meant to change any professional impressions, opinions, or conclusions with which you might not agree. In that we may consider adding a transcript of your point of view to the relevant data set.
- **Right to erasure.** Under certain circumstances, you have the right to request erasure of your personal data. This enables you to ask us to delete or remove personal data where: (i) the personal data are no longer necessary, (ii) you have withdrawn your consent, (iii) you have objected to the processing activities, (iv) the personal data have been unlawfully processed, (v) the personal data have to be erased on the basis of a legal requirement, or (vi) where the personal data have been collected in relation to the offer of information society services.

- **Right to object.** Under certain circumstances, you have the right to object to processing of your personal data where we are relying on legitimate interests as processing ground (see the section 'What is our legal ground for processing your personal data?'). Insofar as the processing of your personal data takes place for direct marketing purposes, we will always honor your request. If it concerns processing for other purposes, we will make a new balance of interests and determine whether we have compelling legitimate grounds that override your interests.
- **Right to restriction.** You have the right to restriction of your personal data if we may not or no longer process the data, or during our assessment of certain other requests of you. Restriction of your personal data means that we will only store the data and no longer process it in any other way, unless: (i) with your consent, (ii) for the establishment, exercise or defense of legal claims, (iii) for the protection of the rights of another natural or legal person, (iv) or for reasons of important public interest.
- **Right to data portability.** Under certain circumstances, you have the right to data portability, if it concerns processing that is carried out by us by automated means, and only if the processing ground for such processing is your consent or the performance of a contract to which you are a party (see the section 'What is our legal ground for processing your personal data?'). This right entails that we may provide certain personal data to you or a third party of your choice in a structured, commonly used, machine-readable format.
- **Right in relation to automated decision-making.** Under certain circumstances, you have the right not to be subject to a decision based solely on automated processing, which significantly impacts you ("which produces legal effects concerning you or similarly significantly affects you"). In this respect, please be informed that when processing your personal data, we do not make use of automated decision-making.
- **Right to complaint.** In addition to the above-mentioned rights you have the right to lodge a complaint with the Dutch Data Protection Authority. However, we would appreciate the chance to deal with your concerns ourselves before you approach the supervisory authority. Therefore, please contact us if you have a complaint on how we handle your personal data, and we can try to solve the issue.

For more information on your privacy rights, please be referred to [this webpage](#) of the European Commission (in English) or [this webpage](#) of the Dutch Data Protection Authority (in Dutch).

8 For how long does Meridia store personal data?

In principle, we do not store your personal data any longer than is strictly necessary for the purposes for which we process your personal data. We apply (longer) standard retention periods if this is required to comply with minimum statutory retention periods. For example, data required for our bookkeeping is retained for seven years.

Exception: shorter retention period

If you or another person successfully exercises one of your privacy rights, it can be that the relevant personal data may no longer be retained. In such cases, we may process your personal data for a shorter period, than as stated under the 'main rule' above. Please be referred to the 'What are your privacy rights?' section below, for more information on this.

Exception: longer retention period

In exceptional cases, we may process your personal data longer than as stated under the 'main rule' above. This is the case if we need to process your personal data for a longer period in view of:

- A legal procedure;
- The right to freedom of expression and to information;
- A task carried out in the public interest or in the exercise of official authority vested in the controller.

9 Usage of your data outside the EEA

The transfer of your personal data to a third party outside the EEA can in the first place be legitimized based on an adequacy decision of the European Commission, in which it is decided that the (part within the) third country in question ensures an adequate level of data protection. See [this link](#) for a summary of the applicable adequacy decisions.

If your personal data is transferred to a country outside the EEA for which there is no adequacy decision, we agree on the applicability of a framework agreement (Standard Contractual Clauses) with the relevant party. This is a standard contract to safeguard the protection of your personal data, which is approved by the European Commission, in which the parties fill out the appendices. See [this link](#) for an overview of the Standard Contractual Clauses.

You can contact us if you want additional information about the way in which we legitimize the transfer of your personal data to countries outside the EEA. Our contact details are stated at the bottom of this Privacy Statement.

10 Exercising your privacy rights

You can exercise your privacy rights by contacting us at legal@meridia.land with your privacy request or complaint. Exercising your privacy rights is free of charge and can be carried out by e-mail, post or phone via the contact details displayed below. If requests are manifestly unfounded or excessive, in particular because of the repetitive character, we will refuse to comply with the request. We may also ask for certain additional information from you to help us confirm your identity or to determine the nature and scope of your request, before we comply with such request.

We will provide you with information about the follow-up of your request without undue delay and in principle within one month of receipt of the request. Depending on the complexity of the request and on the number of requests, this period can be extended by another two months. We will notify you of such an extension within one month of receipt of the request. If we will not grant your request, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

11 How can you contact Meridia?

For any questions, comments or requests in relation to our processing of your personal data, you may contact us by post or by e-mail:

- Postal address: Mauritskade 63, 1092 AD Amsterdam, The Netherlands;
- E-mail address: legal@meridia.land ;
- Phone number: +31 85 001 4445.

12 **Changes to our Privacy Statement**

Please know that we may make changes to this Privacy Statement from time to time. Where required and only if possible, we will inform you of such updates. The current version is always available on our website www.meridia.land. This Privacy Statement was last amended in April 2024.