

DATA ETHICS POLICY



FirstFarms

I. PURPOSE OF THE POLICY

- This policy describes FirstFarms' approach to the data ethic and the principals for ethical, responsible and transparent data processing in the company.
- Secure that FirstFarms' employees are familiar with and understand the company's approach to data ethic and act upon defined principals.

II. SCOPE OF THE POLICY

- FirstFarms complies with both Danish and EU law on data and privacy protection. Therefore, this policy supplements the personal data policy and the policy for using cookies.
- All kind of data which is handled by FirstFarms is subject to this policy.
- This internal policy is introduced to the employees who access all kind of data and is available at the headquarters of each company in the FirstFarms-group and at FirstFarms' corporate webpage.
- The provisions of this policy are valid for all the companies in FirstFarms-group (Appendix 1) until new modifications.

III. KEY PRINCIPLES

FirstFarms is possessing, collecting, handling and processing different types of data. Data has great importance for the functions of the company. FirstFarms strives to handle data in an ethical way. All kinds of data are processed legally, fairly and transparently.

FirstFarms collects data both from primary and secondary sources. Data collected by the company is both personal and general data. The company's approach for collecting, handling and processing of personal data is described in FirstFarms' personal data policy, which is available on the company's website. Any data, which FirstFarms possess, is kept to a minimum in order to fulfil the purpose, is stored securely, kept accurate, retained for no longer than necessary, and is only used for a specific and legitimate business.

FirstFarms do not use algorithms, machine learning or artificial intelligence for processing of data. If FirstFarms will implement the mentioned methods for data processing, the data ethic policy will be reevaluated.

Third parties

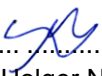
All types of data that the company possess may only be handed over to the third parties for the performance of their activities in connection with the execution of the contracts.

Depending on the type of processing, data may be processed by:

- Those who participate in the negotiation or direct execution of contracts (IT operators and other intermediaries).
- Those who ensure full operability in fulfilling the contract and all transactions related to the contract, as well as with the systems in which the contract is taken into account.
- Those who provide security and other protection to FirstFarms' data systems.
- Those who ensure the quality level to meet customer requirements.
- Those who collaborate in collecting customer receivables (if applicable).
- Those who store customer records.

This internal policy enters into force and effect on all companies from the FirstFarms group.

In Billund, on March 2022


.....
Anders Holger Noergaard

Appendix 1: Companies from the FirstFarms group

FirstFarms A/S, a Danish joint-stock company, registered in the Trade Registry under CVR no. 28312504, headquartered in Majsmarken 1, 7190 Billund, Denmark.

FirstFarms Agra M s.r.o., with its registered seat at Vinohrádok 5741, Malacky 901 01, the Slovak Republic, BIN 34 122 087, registered in the Commercial Register maintained by the District Court Bratislava I, Section Sro., Insert No. 13205/B, the Slovak republic.

FirstFarms Mlyn Záhorie a.s., with its registered seat at Vinohrádok 5741, Malacky 901 01, the Slovak Republic, BIN 34 104 071, registered in the Commercial Register maintained by the District Court Bratislava I, Section Sa, Insert No. 4869/B, the Slovak republic.

FirstFarms Mast Stupava a.s., with its registered seat at Vinohrádok 5741, Malacky 901 01, the Slovak Republic, BIN 36 529 401, registered in the Commercial Register maintained by the District Court Bratislava I, Section Sa, Insert No. 2375/B, the Slovak republic.

FirstFarms s.r.o., with its registered seat at Vinohrádok 5741, Malacky 901 01, the Slovak Republic, BIN 35 916 346, registered in the Commercial Register maintained by the District Court Bratislava I, Section Sro, Insert No. 34492/B, the Slovak republic.

Obilná s.r.o., with its registered seat at Vinohrádok 5741, Malacky 901 01, the Slovak Republic, BIN: 53 084 438, registered in the Commercial Register maintained by the District Court Bratislava I, Section Sro, Insert No. 145035/B; the Slovak republic.

MORAVA AGRO, s.r.o. with its registered seat at Vinohrádok 5741, 901 01 Malacky, the Slovak Republic, BIN: 35 920 653, registered in the Commercial Register maintained by the District Court Bratislava I, Section Sro, Insert No. 34880/B; the Slovak republic.

FirstFarms Gabčíkovo, s.r.o., with its registered seat at Patašská 586, Gabčíkovo 930 05, BIN: 35 844 761, registered with Commercial Register of the District Court Trnava Section: Sro, entry no.: 15266/T, the Slovak republic.

Gabčíkovo City land, s.r.o. with its registered seat at Patašská 586 Gabčíkovo 930 05, BIN.: 36 264 881, registered with Commercial Register of the District Court Trnava Section: Sro, entry no.: 15353/T, the Slovak republic.

FirstFarms Slovakia A/S, registered in the Trade Registry under CVR no. 26753015, headquartered in Majsmarken 1, 7190 Billund, Denmark.

FirstFarms Granero, s.r.o. with its registered seat at Vlasatice 419, 691 30 Vlasatice, BIN: 454 78 295, recorded with the Commercial register maintained by the regional court Brno, Section C, Insert No. 5080, Czech Republic.

FirstFarms Czech A/S, registered in the Trade Registry under CVR no. 29146276, headquartered in Majsmarken 1, 7190 Billund, Denmark.

FirstFarms Hungary Kft. with its registered seat at Gádoros, (5932 Gádoros, Tanya hrsz. 073/8.) recorded with the Commercial register maintained by the regional court Brno, Section C, Insert No. 04-09-005726, Tax number: 12851157-2-04, Hungary.

FirstFarms Hungary A/S, registered in the Trade Registry under CVR no. 26156270, headquartered in Majsmarken 1, 7190 Billund, Denmark.

FirstFarms Agro East SRL with its registered seat at DN2B, Surdila Greci, Garii Street, No. 1, Jud. Braila, 817160, registered with the Trade Registry under reference number J09/220/2009 Braila, unique registration code (CUI) RO 15104360, Romania.

FirstFarms SRL with its headquarters in Chisoda, Calea Sagului, No. 219, Office No E3.9, Timis County, registered at ORC J35/1561/2019, fiscal code RO 21795228, Romania.