



23 August 2022

# Valio Group's Data Protection Policy

## Objective

The objective of Valio's data protection policy is to ensure the realisation of data subjects' rights and that all personal data processing always complies with the applicable data protection legislation and good data processing and information management practice. Special attention is paid to the requirements of the General Data Protection Regulation (GDPR), and any risks are analysed, specified and minimised as early as possible.

## Means

The achievement of the objective of the data protection policy is ensured by planning the purpose of personal data processing and assessing its legality before processing is started.

- Personal data processing always complies with the principles determined in the data protection legislation.
- Personal data processing and safeguards are monitored and assessed regularly.
- Data protection training is included in the induction training for all new employees. In addition, employees are provided with training and guidelines regularly.
- Risks are examined regularly, and an internal process has been established for personal data breaches.
- At Valio, the development and monitoring of data protection work are part of an express data protection programme.
- The data protection organisation at Valio consists of representatives of the legal department and privacy champs designated in different business operations.
- Agreements on personal data processing are always made in writing.
- Information security is an integral part of data protection. Compliance with Valio's data protection policy also requires compliance with Valio's information security policy.
- More detailed guidelines on data protection and personal data processing are available from the data protection organisation.



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## Responsibilities

This data protection policy is approved by Valio's Board of Directors, which also bears the ultimate responsibility for the legality and compliance of personal data processing in Valio's operations. Material changes and updates to the data protection policy must also be approved by Valio's Board of Directors.

Every employee at Valio has an obligation to comply with Valio's data protection policy and the guidelines provided, as well as the applicable data protection legislation. In addition, every employee has an obligation to report any personal data breaches or other deficiencies in data protection that they detect.

The legal department and the privacy champs designated in different business operations guide and assist the organisation in matters related to data protection and personal data processing and develop processes related to the realisation of data protection. The data protection organisation provides more detailed guidelines on data protection and personal data processing and is responsible for maintaining the data protection policy and the guidelines issued based on the policy.