

GLANBIA PLC – DATA PROTECTION NOTICE

INTRODUCTION

This Data Protection Notice is issued by Glanbia PLC of Glanbia House, Ring Road, Kilkenny, Ireland, who is the relevant controller of your personal data for the purposes of applicable legislation, including the EU General Data Protection Regulation, as amended or supplemented (“**Data Protection Laws**”). The purpose of this Notice is to set out how Glanbia may collect, use and share personal data about you as a shareholder of Glanbia.

This Notice is issued on behalf of Glanbia PLC’s corporate group, so when we mention “**Glanbia**”, “**Group**”, “**we**”, “**us**” or “**our**” in this Notice, we are referring to the relevant company in Glanbia PLC’s corporate group that is responsible for processing your personal information.

DATA WE COLLECT

The personal details of our shareholders who hold shares directly, or details of the nominee accounts in which some retail and institutional shareholders hold their shares, are held and maintained on our behalf by our registrar, Computershare Investor Services (Ireland) Limited (“**Computershare**”).

Such personal data may include:

- Identity data, including your name, date of birth and nationality;
- Contact data, including your address, email address and telephone number;
- Financial data, including bank account details and tax details;
- Shareholder data, including a statement of the shares held by you in Glanbia, the amount paid on shares, details regarding dividend or interest payments, the date on which you became a member/ceased to be a member of Glanbia.

WHAT WE DO WITH THE INFORMATION WE COLLECT

We are committed to collecting and using personal information in accordance with applicable Data Protection Laws. We usually use your information for the following purposes:

- To manage your shareholder rights and our obligations to you as a shareholder, in accordance with our articles of association and applicable laws;
- To enter into and perform a contract with you;
- To comply with our legal obligations;
- To keep you informed about our shareholder and investor services;
- To operate and improve our business in a responsible and commercially prudent manner.

In accordance with Data Protection Laws, our legal basis for processing this personal data is that it is necessary for our legitimate interests in running and operating our business and ensuring effective communications with our shareholders.

CHANGE OF PROCESSING PURPOSES

We will only use your personal data for the purposes for which we collected it, a legal or regulatory requirement or legitimate interest to use it for another reason that is compatible with the original purpose. Where we need to use your personal data for unrelated purposes, we will notify you and explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

SHARING AND DISCLOSURE OF PERSONAL DATA

We share personal information with a number of trusted third parties who work with us to help deliver our services, in order to fulfil our legal obligations or at your request. Such third parties include:

- Our Group companies and affiliates;
- Our outsourced service providers, including our corporate registrar, Computershare;
- Professional advisors such as lawyers, accountants, auditors, financial and other professionals;
- Third parties in connection with the sale or purchase of the Glanbia Group or assets owned by the Group;
- Regulatory authorities, including tax authorities;
- Law enforcement agencies, courts and other relevant tribunals.

RETENTION OF YOUR PERSONAL DATA

We will retain your personal data for as long as is reasonably required to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect of our relationship with you.

INTERNATIONAL TRANSFERS

Some of the organisations we share information with may be located outside the European Economic Area (“EEA”). We will always take steps to ensure that any transfer of information outside the EEA is carefully managed to protect your privacy rights:

- transfers within the Glanbia Group will be covered by an agreement entered into by members of the Glanbia Group (an intra-group agreement) which contractually obliges each member to ensure that your personal information receives an adequate and consistent level of protection wherever it is transferred within the Group;
- where we transfer your data to non-Glanbia Group members or other companies providing us with a service, we will obtain contractual commitments and assurances from them to protect your personal information. Some of these assurances are well recognised certification schemes such as standard contractual clauses and the EU - US Privacy Shield framework;

- we will only transfer personal information to countries which are recognised as providing an adequate level of legal protection or where we can be satisfied that alternative arrangements are in place to protect your privacy rights; and
- any requests for information we receive from law enforcement or regulators will be carefully validated before personal information is disclosed.

CONTROLLING YOUR PERSONAL INFORMATION

You have the following rights, in certain circumstances and subject to certain restrictions, in relation to your personal data:

- To request access to the personal data we hold about you,
- To request the rectification and/or erasure of your personal data;
- To object to, or restrict, our processing of your personal data;
- Where we are processing personal data based on this being necessary for the performance of a contract with you, the right to receive your personal data, which you provided to us, in a structured, commonly used and machine-readable format or to require us to transmit that data to another controller.

You also have the right to complain about the processing of your personal data to your local supervisory authority which in Ireland is the Data Protection Commission.

If you would like to exercise any of these rights, or have any questions or concerns about how we use your personal information, please contact us via email at groupsecretary@glanbia.ie or send a letter to FAO: The Group Secretary, Glanbia PLC, Glanbia House, Ring Road, Kilkenny, Ireland.

CHANGES TO THIS POLICY

We may review and amend this Notice from time to time, in whole or in part, to keep it up to date or to comply with legal requirements or changes in the way we operate our business. Any changes will be effective immediately upon communicating the revised Notice to you.