

Effective as of October 3, 2018

GDPR PRIVACY POLICY – ADDITIONAL TERMS

If the personal information you submit to our website is subject to the General Data Protection Regulation (Regulation (EU) 2016/679) (the “GDPR”) or if we otherwise process or collect personal information about you via this website that is subject to the GDPR, then this GDPR Privacy Policy – Additional Terms will supplement our Privacy Policy (<https://www.campbellsoupcompany.com/privacy-policy/>) and also apply to our use of such personal information. In the event of a conflict between the terms of the Privacy Policy above and these Additional Terms, then the terms of these Additional Terms shall control.

1. Data Controller

The Campbell Soup Company (“Campbell,” “we,” “us”) is the data controller for the purpose of the GDPR in respect of your personal information collected and used through your use of the website. This is because we dictate the purpose for which your personal information is used and how we use your personal information.

2. Purpose and Legal Basis

As we noted in our Privacy Policy, we use your personal information in connection with the provision of the website and the products and services we provide to you. In particular, your personal information may be used by us, our employees, service providers, and disclosed to third parties for the following purposes. For each of these purposes, we have set out the legal basis on which we use your personal information.

Purpose	Legal Basis
To provide the website to you.	This is in our legitimate interest (i.e., the provision of the website to you).
To communicate with you and to carry out your requests and respond to your communications.	This is in our legitimate interest (i.e., the provision and support of the website and service)
To carry out our obligations arising from any contracts entered into between you and us.	This is to perform a contract between you and us.
To notify you about changes to the website.	This is in our legitimate interest (i.e., the provision of the website and service).
To audit and monitor the use of the website and to improve the quality of the website.	This is in our legitimate interest (i.e., the provision of the website and service, as well as to improve and ensure the security of the website and those services).
To manage complaints, feedback and queries.	This is in our legitimate interests (i.e., the provision and support of the website and service)

Purpose	Legal Basis
	and improvements and development of our business operations).
To carry out satisfaction surveys and analysis.	This is in our legitimate interests (i.e., the provision and support of the website and service and improvement and development of our business operations).
To provide you with shareholder-related information via email newsletter in accordance with your request to receive it	We can do this based on your consent.
To comply with any legal or regulatory obligations (including in connection with a court order and establishing, exercising or defending legal claims).	This is in our legitimate interests (i.e., protection of our business, employees and customers) and for compliance with legal obligations to which we are subject.
To enforce or apply the agreements concerning you (including agreements between you and us).	This is in our legitimate interest (i.e., protection of our business, employees and customers).

Where we rely on our legitimate business interests or those legitimate interests of a third party to justify the purposes for using your personal information, this will include:

- pursuit of our commercial activities and objectives, or those of a third party;
- compliance with applicable legal and regulatory obligations and any codes of conduct;
- improvement and development of our business operations and service offering, or those of a third party; or
- protection of our business, shareholders, employees, customers and consumers, or those of a third party.

3. Your Rights Under the GDPR

You have certain rights with respect to your personal information. The rights may only apply in certain circumstances and are subject to certain exemptions. Please see the table below for a summary of your rights. You can exercise these rights using the contact details below.

	Summary of your rights
Right of access to your personal information	You have the right to receive a copy of your personal information that we hold about you, subject to certain exemptions.
Right to rectify your personal information	You have the right to ask us to correct your personal information that we hold where it is incorrect or incomplete.

<p>Right to erasure of your personal information:</p>	<p>You have the right to ask that your personal information be deleted in certain circumstances. For example (i) where your personal information is no longer necessary in relation to the purposes for which they were collected or otherwise used; (ii) if you withdraw your consent and there is no other legal ground for which we rely on for the continued use of your personal information; (iii) if you object to the use of your personal information (as set out below); (iv) if we have used your personal information unlawfully; or (v) if your personal information needs to be erased to comply with a legal obligation.</p>
<p>Right to restrict the use of your personal information</p>	<p>You have the right to suspend our use of your personal information in certain circumstances. For example (i) where you think your personal information is inaccurate and only for such period to enable us to verify the accuracy of your personal information; (ii) the use of your personal information is unlawful and you oppose the erasure of your personal information and request that it is suspended instead; (iii) we no longer need your personal information, but your personal information is required by you for the establishment, exercise or defense of legal claims; or (iv) you have objected to the use of your personal information and we are verifying whether our grounds for the use of your personal information override your objection.</p>
<p>Right to data portability</p>	<p>You have the right to obtain your personal information in a structured, commonly used and machine-readable format and for it to be transferred to another organization, where it is technically feasible. The right only applies where the use of your personal information is based on your consent or for the performance of a contract, and when the use of your personal information is carried out by automated (i.e. electronic) means.</p>
<p>Right to object to the use of your personal information</p>	<p>You have the right to object to the use of your personal information in certain circumstances. For example (i) where you have grounds relating to your particular situation and we use your personal information for our legitimate interests (or those of a third party); and (ii) if you object to the use of your personal information for direct marketing purposes.</p>
<p>Right to withdraw consent</p>	<p>You have the right to withdraw your consent at any time where we rely on consent to use your personal information.</p>
<p>Right to complain to the relevant data protection authority</p>	<p>You have the right to complain to the relevant data protection authority, which in the case of Campbell, is Datatilsynet, if you believe or suspect that we have processed your personal data in violation of data protection law. You can reach Datatilsynet at Borgergade 28, 5, 1300 Copenhagen, or by telephone at +45 3319 3200, or by email at dt@datatilsynet.dk.</p>

4. Data Retention

We will keep personal information for as long as is necessary for the purposes for which we collect it or as long as the law requires. The precise period will depend on the purpose for which we hold your information.

5. Questions

If you have questions about this GDPR – Additional Terms, our Privacy Policy, or if you wish to exercise your rights as a data subject, please contact us at privacy@campbellsoup.com.