

Privacy Policy

As of September 22, 2026

With this privacy policy, Hershey Trading GmbH (hereinafter referred to as "**we**" or "**Hershey Trading**") informs you how we collect, use and disclose personal data when you use our website (the "**Website**"). Personal data means any information that relates to an identified or identifiable person.

1. Data controller and contact person

The responsible person for the data processing described in this privacy policy is:

Hershey Trading GmbH
Industriestrasse 24
6300 Zug
Switzerland
HersheyTrading@hersheys.com

If you have any data protection concerns, you can contact our data protection team at the following address:

Hershey Netherlands B.V.
Attn. GDPR Services Team
Basisweg 10
1043 AP Amsterdam
The Netherlands
GDPR-hershey@intertrustgroup.com

2. Collection and processing of personal data

If you visit our Website or if you contact us (e.g. by e-mail or mail), we process namely the following categories of personal data:

- **Contact details:** in particular first name, surname and mail address.
- **Communication data:** in particular, preferred communication channel, correspondence with Hershey Trading (including records of communication). We use only cookies and similar technologies that are necessary for the operation, security, and functionality of this website. We do not use analytics, advertising, or other non-essential cookies.

3. Sources of personal data

We receive personal data from:

- **Direct Sources:** Generally, we process personal data that we receive directly from you, such as in the course of the use of the Website or in direct communications via e-mail, telephone or other means.
- **Indirect Sources:** In certain cases, we may collect personal data indirectly. This happens namely when someone else includes you in communication sent to us. In addition, we may obtain personal data from publicly accessible sources (e.g. from the press, the Internet). In individual cases, it is possible that personal data is derived from the combination of various non-personal data.

4. Purposes of the data processing

We may process personal data in accordance with applicable data protection law, in particular the provisions of the Swiss Federal Act on Data Protection, for the following purposes (the "**Processing Purposes**") and, if necessary under applicable data protection law, on the basis of the following legal bases:

4.1. To comply with legal obligations

We process personal data where there is a legal or regulatory obligation to do so. Processing Purposes include namely:

- Document compliance with certain legal and regulatory requirements;
- Participate in investigations and proceedings, cooperate with and respond to inquiries from government agencies and courts.

4.2. To safeguard legitimate interests

We process personal data where this is necessary to protect legitimate private interests of us or of third parties, or to protect legitimate public interests, for example:

- **Ensuring IT security and IT operation:** in particular, operation and further development of our Website and IT systems, troubleshooting, protection of IT assets, Hershey Trading's employees and other persons, and assets (e.g., through network and mail scanners);
- **Communication:** in particular, processing of and responding to requests;
- **Ensuring compliance, internal administration and record keeping:** in particular, checking compliance with internal rules of Hershey Trading;
- **Carrying out corporate transactions:** in particular, the sale or purchase of business units, companies or parts of companies and the associated transfer of personal data;
- **Dealing with legal disputes:** in particular assertion of legal claims and defense in connection with legal disputes and official proceedings;
- **Self-protection and protection of third parties:** in particular, protection of third parties and our employees, Hershey Trading's data, trade secrets and assets as well as assets that have been entrusted to Hershey Trading;

- **Prevention and detection of crime:** in particular, preventing and combatting abuse, collecting evidence, conducting inter-agency investigations and data analysis to combat fraud.

4.3. Based on your consent

If you have given Hershey Trading your consent for certain processing purposes, we process your personal data within the scope of and based on this consent, unless we have another legal basis and we require such a basis. Consent given can be revoked at any time, but this has no effect on data processing that has already taken place.

5. Recipients of personal data

Within Hershey Trading, access to your data is granted to those departments that need them to fulfill the aforementioned Processing Purposes.

In addition, we may disclose personal data to the following categories of recipients, provided that the disclosure serves to fulfil the aforementioned Processing Purposes:

- **Service providers** (including commissioned data processors and vicarious agents) in Switzerland and abroad;
- **Group companies** of Hershey Trading, including The Hershey Company and its affiliates;
- **Business partners** of Hershey Trading or its group companies;
- **Acquirers** or parties interested in acquiring business units, companies or other parts of Hershey Trading;
- **Parties** to potential or actual **legal proceedings**;
- Local, national and foreign **authorities, agencies and courts**;

all collectively referred to as the "**Recipient**".

If we transfer personal data to third parties, the respective current privacy notices of the Recipients are also applicable. The Recipients may be jointly responsible with us or act as data processors.

6. Disclosure of personal data abroad

We may transfer personal data to Recipients in the EU, the EEA, the United Kingdom, the United States, other countries in which Hershey group companies are located, and in any country in the world, in particular to all countries in which Hershey is represented by group companies, branches or other offices and representatives (namely the United States, the EU, the EEA, and the United Kingdom) as well as to the countries in which our service providers process data (such as countries of the EU, the EEA, the United Kingdom and the United States).

Personal data may be transferred to a country without adequate data protection, provided that:

- We ensure adequate protection, namely by means of sufficient contractual safeguards such as standard contractual clauses approved by the Swiss Federal Data Protection and Information Commissioner or the European Commission, and binding corporate rules. You

can obtain a copy of the contractual safeguards from the contact point mentioned above or find out from them where such a copy can be obtained. We reserve the right to redact such copies for data protection or confidentiality reasons or to supply only excerpts;

- You give your express consent;
- It is necessary for the performance of a contract with you or a contract in your interest;
- It is necessary to safeguard overriding public interests, to establish, exercise or enforce legal claims or to protect the life or physical integrity of you or third parties;
- You have made the personal data generally accessible and do not expressly prohibit processing; or
- The personal data originate from a register provided for by law, which is public or accessible to persons with an interest worthy of protection, insofar as the legal requirements for inspection are met in the individual case.

7. Retention of personal data

We retain personal data as long as it is necessary for the Processing Purpose for which we collected it. In individual cases, there may be a contractual or legal obligation to retain data (e.g. in accordance with the Swiss Code of Obligations or other applicable legislation). It is possible that personal data will be stored for the time during which claims can be asserted against our company and insofar as we are otherwise legally obligated to do so or legitimate business interests require this (e.g. for evidence and documentation purposes). We thus store contract-related personal data in principle for the duration of the contractual relationship and for ten years beyond the termination of the contractual relationship.

If personal data is no longer required for the fulfilment of the processing purpose, it will be deleted or anonymized as far as possible. Subject to an express written agreement, we are under no obligation to you to retain personal data for a specific period of time.

8. Data security

We take appropriate technical and organizational security measures to protect your personal data from unauthorized access and misuse, such as the issuance of warnings, training, IT and network security solutions, access controls and restrictions, encryption of data media and transmissions, pseudonymization, controls.

9. Rights of the data subject

You have the following rights in relation to your personal data:

- Information on personal data concerning you;
- Correction, deletion or destruction of personal data;
- Objection to the processing of personal data;

- Revocation of consent if the processing of personal data is based on your consent. The revocation is possible at any time and is effective for the future. The revocation does not affect the lawfulness of the data processing that took place prior to the revocation;
- In certain cases, data output and transmission in a commonly used electronic format that allows further use and transmission.

We will inform you separately about your rights in connection with any automated individual decision-making, insofar as this is required by law. When you use our website, we generally do not use any procedures of automated individual decision-making. To exercise your rights, please submit your request through our Privacy Form available at [Link to this form](#). The exercise of your rights generally requires that you can clearly prove your identity (e.g. by providing a copy of your identity document where your identity is not otherwise clear or can be verified).

We reserve the right to restrict your rights within the framework of the applicable law and, for example, not to provide complete information or not to delete data.

You have the right to enforce your claims in court or to file a complaint with the competent data protection authority. The data protection authority in Switzerland is the Swiss Federal Data Protection and Information Commissioner (<http://www.edoeb.admin.ch>).

10. Obligations of the data subject

If you provide us with personal data of other persons, please make sure that these persons are aware of this privacy policy and only share their personal data with us if you are allowed to do so and if this personal data is correct.

Please note that the Internet is generally not a secure environment because it is an open network that can be accessed by anyone. Therefore, we also appeal to your personal responsibility regarding to the handling of your personal data. To the extent permitted by law, we exclude liability for the security of data that you transmit to us via the Internet (e.g. by e-mail) or other electronic channels and for any direct or indirect damage. We ask you to choose other communication channels, should this appear necessary or reasonable for security reasons.

11. Amendment of this privacy policy

We may amend this privacy policy at any time without prior notice. The current version published on our Website shall apply.