



**syngenta**

## NA Data Privacy Policy

## **Policy**

It is the policy of Syngenta Corporation and its affiliates in the United States and Canada (collectively, “Syngenta,” “we,” “us,” and “our”) to comply with all applicable privacy and data protection laws. This policy reflects the importance we place on earning and keeping the trust of our employees, customers, and others who share their personal information with us.

## **Scope**

This policy applies to all employees of Syngenta in the United States and Canada and covers all personal information processed by Syngenta, whether it relates to internal or external data subjects, and no matter where or why it is processed. This policy covers all personal information collected, stored or used in the course of conducting Syngenta business.

## **Definitions**

**“Personal information”** means any information, recorded in any form or format, relating to an identified or identifiable natural person (the “data subject”).

**“Processing”** of personal information means any operation or set of operations performed on personal information, whether or not by automatic means, such as collecting, recording, organizing, storing, adapting, altering, retrieving, consulting, using, disclosing, transmitting, disseminating, accessing or providing access to, combining, blocking, erasing, or destroying personal information.

## **Responsibilities of Syngenta Employees**

All Syngenta businesses and functions must adopt procedures to implement this policy. Implementation must include providing appropriate information and training to Syngenta employees.

All Syngenta employees must comply with all applicable privacy and data protection laws, this policy, and all related Syngenta policies and procedures that apply to them.

## **Privacy Principles**

Although privacy and data protection laws vary from country to country, most are based on the following privacy principles. Accordingly, to assure compliance with all privacy and data protection laws, to promote consistency within Syngenta, and to facilitate the transfer of personal information across borders as necessary for the operation of a global enterprise, Syngenta will adhere to the following privacy principles at least to the extent required by applicable law:

## Limitations on Processing Personal Information

- **Notice and Consent** – We will process information fairly and lawfully and, where applicable, only with the knowledge or consent of the data subject. The type of notice or consent required will depend on the context and the circumstances, the sensitivity of the personal information, the data subject’s reasonable expectations, and legal requirements.
- **Specific Purpose** – We will process personal information only for specific, documented, limited and legitimate purposes.
- **Limitations on Use** – We will not process personal information in a manner inconsistent with the purposes for which it was originally collected without first obtaining the data subject’s consent, except as required by applicable law. The type of consent required will depend on the context and the circumstances, the sensitivity of the personal information, the data subject’s reasonable expectations, and legal requirements.
- **Data Proportionality** – The personal information we collect will be relevant, adequate and not excessive for the purposes for which it is collected or to which the data subject subsequently consents.
- **Direct Marketing** – We will not use personal information for direct marketing purposes without the data subject’s consent. The data subject’s consent may be express or implied, “opt-out” or “opt-in,” depending on the circumstances and applicable law.
- **Automated Decisions** – We will not make decisions based solely on automated processing of personal information except as permitted by applicable law.

## Transfers of Personal Information (Including Within Syngenta)

- **Transfers to Third Parties**
  - We will disclose personal information to third parties only for purposes consistent with those for which the personal information was originally collected or to which the data subject has subsequently consented.
  - We will take appropriate measures, by contract or otherwise, to provide protection for personal information we disclose to our affiliates, service providers, and other third parties.
  - If required by law, we will obtain the data subject’s consent before disclosing personal information to a third party. In such cases, the type of consent required will depend on the context and the circumstances, the sensitivity of the personal information, the data subject’s reasonable expectations, and legal requirements.
  - There may be exceptions to these general principles, depending on applicable law, if, for example, the disclosure is required by court order, to comply with a law, to prevent a crime, or to enforce a legal right.
- **Transfers to Other Countries**
  - Because data protection and privacy laws vary from country to country, we will take appropriate measures, by contract or otherwise, to provide protection for personal information that is transferred from one country to another, including transfers within Syngenta and between Syngenta and its affiliates outside of the United States, Canada and Mexico.

If required by law, we will first obtain the data subject's consent to the transfer. In such cases, the type of consent required will depend on the context and the circumstances, the sensitivity of the personal information, the data subject's reasonable expectations, and legal requirements.

### **Management of Personal Information**

- **Quality** – We will take appropriate steps to ensure that personal information is accurate, complete and reliable for its intended use and, where necessary for its intended use, kept up-to-date.
- **Access** – We will maintain procedures to give data subjects appropriate access to their personal information and, when appropriate, an effective means to have their personal information corrected or deleted.
- **Security** – We will develop, implement and maintain a comprehensive data security program, including appropriate administrative, physical and technological security measures to protect personal information from unauthorized access, unauthorized use, and unauthorized or accidental destruction, modification or disclosure, taking into account the nature of the risks and the sensitivity of the personal information.
- **Retention** – We will not keep personal information in personally identifiable form for longer than is necessary for the purposes for which it was collected or to which the data subject has consented, except for legitimate purposes permitted by law, such as regulatory compliance.

### **Accountability and Enforcement**

- **Accountability** – We will designate individuals within Syngenta to be accountable for compliance with privacy and data protection laws, this policy, and related policies and procedures.
- **Enforcement** – We will provide internal controls for monitoring compliance with privacy and data protection laws, this policy and related policies and procedures. We will update our policies and procedures as necessary to remain compliant with applicable privacy and data protection laws.
- **Openness** – We will be open about our data practices and our data protection policies. We will provide convenient ways for our employees, customers, business partners and the general public to learn about our data practices and our data protection policies.
- **Complaint Process** – We will provide a fair process for investigating and resolving complaints and objections regarding our data practices and will take appropriate steps to communicate our process to the data subjects who entrust their personal information to us.

Summary sheet	
<b>Title</b>	NA Data Privacy Policy
<b>Purpose</b>	To comply with all applicable privacy and data protection laws
<b>Scope</b>	All NA employee and sites
<b>Personal Scope</b>	<input checked="" type="checkbox"/> General Policy / CoP <input type="checkbox"/> Functional Policy / CoP
<b>Geographic Scope</b>	<input type="checkbox"/> Group Policy / CoP <input checked="" type="checkbox"/> Country Policy / CoP
<b>Target audience</b>	All NA employees and sites
<b>Version no.</b>	
<b>Effective date of current version</b>	02/01/2010
<b>Effective date of original version</b>	02/01/2010
<b>Revision history</b>	Reviewed in January 2015 and no changes
<b>Approved by</b>	Board of Directors
<b>Issued by</b>	Corporate Legal Affairs NA
<b>Owner / Contact information</b>	Cheryl L. Quain, Head Corporate Legal Affairs NA, Cheryl.quain@syngenta.com



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