

Date

11 February 2026

Our reference

2023-225262

z2014-00412

Contact

070 8888 500

Subject

Decision approving Controller Binding Corporate Rules of FrieslandCampina

The Autoriteit Persoonsgegevens,

Pursuant to the request by **FrieslandCampina B.V.**, on behalf of the group **Koninklijke FrieslandCampina N.V.** (hereinafter '**FrieslandCampina**'), received on **6 June 2014**, reference **2023-225262**, formerly z2014/00412, for approval of their binding corporate rules for controller;

Having regard to Articles 47, 57 and 64 of the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation or GDPR);

Having regard to the judgment of the Court of Justice of the European Union in Data Protection Commissioner v. Facebook Ireland Ltd and Maximillian Schrems, C-311/18 of 16 July 2020;

Having regard to EDPB Recommendations 01/2020 on measures that supplement transfer tools to ensure compliance with the EU level of protection of personal data of 18 June 2021;

Having regard to EDPB Recommendations 1/2022 on the Application for Approval and on the elements and principles to be found in Controller Binding Corporate Rules (Art. 47 GDPR) of 20 June 2023 (hereinafter "the Recommendations 1/2022");

Makes the following observations:

1. Article 47(1) of the EU General Data Protection Regulation 2016/679 (GDPR), provides that the competent Supervisory Authority shall approve Binding Corporate Rules (BCRs) provided that they meet the requirements set out under this Article.
2. The implementation and adoption of BCRs by a group of undertakings is intended to provide guarantees to controllers and processors established in the EU as to the



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protection of personal data that apply uniformly in all third countries and, consequently, independently of the level of protection guaranteed in each third country.

3. Before carrying out any transfer of personal data on the basis of the BCRs to one of the members of the group, it is the responsibility of any data exporter in a Member State, if needed with the help of the data importer, to assess whether the level of protection required by EU law is respected in the third country of destination in the case of the specific data transfer, including onward transfer situations. This assessment has to be conducted in order to determine whether any legislation or practices of the third country applicable to the to-be-transferred data may impinge on the data importer's and/or the data exporter's ability to comply with their commitments taken in the BCR, taking into account the circumstances surrounding the transfer. In case of such possible impingement, the data exporter in a Member State, if needed with the help of the data importer, should assess whether it can provide supplementary measures in order to exclude such impingement and therefore to nevertheless ensure, for the envisaged transfer at hand, an essentially equivalent level of protection as provided in the EU. Deploying such supplementary measures is the responsibility of the data exporter and remains its responsibility even after approval of the BCRs by the competent Supervisory Authority and as such, they are not assessed by the competent Supervisory Authority as part of the approval process of the BCRs.
4. In any case, where the data exporter in a Member State is not able to implement supplementary measures necessary to ensure an essentially equivalent level of protection as provided in the EU, personal data cannot be lawfully transferred to a third country under these BCRs. In the same vein, where the data exporter is made aware of any changes in the relevant third country legislation that undermine the level of data protection required by EU law, the data exporter is required to suspend or end the transfer of personal data at stake to the concerned third countries.
5. In accordance with the cooperation procedure as set out in the Working Document WP263 rev01,¹ the Controller BCRs application of **FrieslandCampina** was reviewed by the Autoriteit Persoonsgegevens as the competent supervisory authority for the BCRs (BCR Lead) and by two Supervisory Authorities (SA) acting as co-reviewers, *in this case the Lithuanian and Romanian SAs*. The application was also reviewed by the concerned SAs to which the BCRs were communicated as part of the cooperation procedure.
6. The review concluded that the Controller BCRs of **FrieslandCampina** comply with the requirements set out by Article 47(1) of the GDPR as well as the Recommendations 1/2022 and in particular that the aforementioned BCRs:

¹ Endorsed by the EDPB on 25 May 2018.



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- i) Are legally binding and contain a clear duty for each participating member of the Group including their employees to respect the BCRs by entering in an Intra-Group Agreement (*Section 5 of the application form and Article 1.4 of the BCRs (both codes)*);
- ii) Expressly confer enforceable third-party beneficiary rights to data subjects with regard to the processing of their personal data as part of the BCRs (*Article 17.1 of the Employee Code and 18.1 of the Third Party Privacy Code*);
- iii) Fulfil the requirements laid down in Article 47(2) of the GDPR:
 - a) The structure and contact details of the group of undertakings and each of its members are described in the Application form of the Recommendations 1/2022 that was provided as part of the file review in *Section 5 of the application form*;
 - b) the data transfers or set of transfers, including the categories of personal data, the type of processing and its purposes, the type of data subjects affected and the identification of the third country or countries in question are specified in *Annex 2 to the BCRs (both codes)*;
 - c) the legally binding nature, both internally and externally, of the Controller BCRs is recognized in *Article 1.4 of the BCRs (both codes)*;
 - d) the application of the general data protection principles, in particular purpose limitation, data minimisation, limited storage periods, data quality, data protection by design and by default, legal basis for processing, processing of special categories of personal data, measures to ensure data security, and the requirements in respect of onward transfers to bodies not bound by the binding corporate rules are detailed in *Articles 1.5, 2, 3, 4, 5, 6, 8 and 10 of the Employee Code and Articles 1.5, 2, 3, 4, 5, 6, 8 and 11 of the Third Party Privacy Code*;
 - e) the rights of data subjects in regard to processing and the means to exercise those rights, including the right not to be subject to decisions based solely on automated processing, including profiling in accordance with Article 22 of the GDPR, the right to lodge a complaint with the competent supervisory authority and before the competent courts of the Member States in accordance with Article 79 of the GDPR, and to obtain redress and, where appropriate, compensation for a breach of the binding corporate rules which are set forth in *Articles 6 and 7 of the BCRs (both Codes)*;
 - f) the acceptance by the controller or processor established on the territory of a Member State of its liability for any breaches of the binding corporate rules by any member concerned not established in the Union as well as the exemption from that liability, in whole or in part, only if the concerned party proves that that member is not responsible for the event giving rise to the damage are specified in *Article 17 of the Employee Code and Article 18 of the Third Party Privacy Code*;



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- g) how the information on the binding corporate rules, in particular on the provisions referred to in points (d), (e) and (f) of Article 47.2 of the GDPR are provided to the data subjects in addition to Articles 13 and 14 of the GDPR, is specified in *Articles 1.5, 6.1 and 20.3 of the Employee Code and Articles 1.5, 6.1 and 21.3 of the Third Party Privacy Code*;
- h) the tasks of any data protection officer designated in accordance with Article 37 of the GDPR or any other person or entity in charge of monitoring the compliance with the binding corporate rules within the group of undertakings, or group of enterprises engaged in a joint economic activity, as well as monitoring training and complaint-handling are detailed in *Article 12 of the Employee Code and Article 13 of the Third Party Privacy Code*;
- i) the complaint procedures are specified in *Article 16 of the Employee Code and Article 17 of the Third Party Privacy Code*;
- j) the mechanisms put in place within the group of undertakings for ensuring the monitoring of compliance with the binding corporate rules are detailed in *Article 15 of the Employee Code and Article 16 of the Third Party Privacy Code*. Such mechanisms include data protection audits and methods for ensuring corrective actions to protect the rights of the data subject. The results of such monitoring are communicated to the person or the entity referred to in point (h) above and to the board of the controlling undertaking of the group of undertakings (in this situation to **Koninklijke FrieslandCampina N.V.**, as well as to the data privacy organization) and are available upon request to the competent supervisory authority;
- k) the mechanisms for reporting and recording changes to the rules and reporting those changes to the supervisory authorities are specified in *Article 20.1 of the Employee Code and Article 21.1 of the Third Party Privacy Code*;
- l) the cooperation mechanism put in place with the supervisory authority to ensure compliance by any member of the group of undertakings is specified in *Article 17.4 of the Employee Code and Article 18.4 of the Third Party Privacy Code*. The obligation to make available to the supervisory authority the results of the monitoring of the measures referred to in point (j) above is specified in *Article 15.2 of the Employee Code and Article 16.2 of the Third Party Privacy Code*;
- m) the mechanisms for reporting, upon request, to the competent supervisory authority any legal requirements to which a member of the group of undertakings is subject in a third country which are likely to have a substantial adverse effect on the guarantees provided by the binding corporate rules are described in *Article 13.4 of the Employee Code and Article 14.4 of the Third Party Privacy Code*;



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- n) finally, provide for an appropriate data protection training to personnel having permanent or regular access to personal data (*Article 14 of the Employee Code and Article 15 of the Third Party Privacy Code*).

7. The EDPB provided its **Opinion 3/2026** in accordance with Article 64(1)(f) of the GDPR.

DECIDES AS FOLLOWING:

1. The Autoriteit Persoonsgegevens approves the Controller BCRs of **FrieslandCampina** as providing appropriate safeguards for the transfer of personal data in accordance with Article 46(1) and (2) (b) and Article 47(1) and (2) GDPR. For the avoidance of doubt, the Autoriteit Persoonsgegevens recalls that the approval of BCRs does not entail the approval of specific transfers of personal data to be carried out on the basis of the BCRs. Accordingly, the approval of BCRs may not be construed as the approval of transfers to third countries included in the BCRs for which an essentially equivalent level of protection to that guaranteed within the EU cannot be ensured.
2. The approved BCRs will not require any specific authorization from the concerned SAs.
3. In accordance with Article 58(2)(j) GDPR, each concerned SA maintains the power to order the suspension of data flows to a recipient in a third country or to an international organization whenever the appropriate safeguards envisaged by the Controller BCRs of **FrieslandCampina** are not respected.
4. **Annex 1** forms an integral part of this decision and shall be considered a binding appendix thereto.
5. **Annex 2** contains the Controller BCRs which are approved by this decision, and forms an integral part of this decision. The BCRs are made up of two documents: the *FrieslandCampina Privacy Code for Employee Data* and the *FrieslandCampina Third Party Privacy Code*, which together make up the Controller BCRs. Both are annexed to this decision.

The Hague, 11-02-2026

Yours sincerely,

Autoriteit Persoonsgegevens

Chair

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Legal remedy

If you do not agree with this decision, you can submit a notice of objection.² The notice of objection must be signed and dated, include the name and address of the (legal) person submitting it and should entail a description of the decision against which the objection is being lodged and the grounds on which it is based. The notice of objection must be received by the Autoriteit Persoonsgegevens within six weeks after this decision is taken. Please address the notice to the Autoriteit Persoonsgegevens and submit the notice via PO Box 93374, 2509 AJ The Hague, The Netherlands.³

It is also possible to submit a notice of objection via our web form on the website, see <https://www.autoriteitpersoonsgegevens.nl/over-de-autoriteit-persoonsgegevens/bezwaar-maken>.

Please note that submitting a notice of objection will not automatically suspend the effect of this decision.

² The Dutch General Administrative Law Act ("Algemene wet bestuursrecht") applies to this procedure.

³ Article 6:7 in conjunction with article 6:8 (1) of the Dutch General Administrative Law Act.



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ANNEX 1 TO THE DECISION

The Controller BCRs of **FrieslandCampina** that are hereby approved cover the following:

a. Scope.

Article 1.1 of the Employee Code:

This Code applies to the Processing by FrieslandCampina as a Controller of personal data of FrieslandCampina Employees that are (i) subject to data transfer restrictions under EEA Data Protection Laws (or were subject to data transfer restrictions under EEA Data Protection Laws prior to their Transfer outside the EEA), and (ii) are transferred to a FrieslandCampina Group Company in a Non-Adequate Country (Employee Data).

Article 1.1 of the Third Party Privacy Code:

This Code applies to the Processing by FrieslandCampina as a Controller of personal data of Consumers, Customers, Suppliers, Members, and Business Partners that are (i) subject to data transfer restrictions under EEA Data Protection Laws (or were subject to data transfer restrictions under EEA Data Protection Laws prior to their Transfer outside the EEA), and (ii) are transferred to a FrieslandCampina Group Company in a Non-Adequate Country (Personal Data). This Code does not address the Processing of Employee Data of FrieslandCampina unless and to the extent such Employee is a Consumer or Customer of FrieslandCampina.

b. EEA countries from which transfers are to be made:

Belgium, Denmark, France, Germany, Greece, Hungary, Italy, the Netherlands, Poland, Romania, Spain, Sweden.

c. Third countries to which transfers are to be made:

Australia, Brazil, China, Egypt, Ethiopia, Ghana, India, Indonesia, Ivory Coast, Japan, Malaysia, Morocco, New Zealand, Nigeria, Pakistan, the Philippines, Saudi Arabia, Singapore, Thailand, the United Arab Emirates, Ukraine, the United Kingdom, the United States of America, Vietnam.

d. Purposes of the transfer:

The purposes are detailed in *Annex 2 to the BCRs (both Codes)*.

They include the following:

Employee data:

- *Personnel Management: Performance of the employment contract with an Employee (or taking necessary steps at the request of an Employee prior to entering into a contract) and managing work activities and personnel generally, including:*
 - *Recruitment and outplacement, employability performing background checks, secondments, transfers, rehiring.*
 - *Administering salaries, bonuses, contractual benefits and other awards such as stock appreciation rights, healthcare, pensions and savings plans.*



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- *Administering payments, tax issues, social security contributions.*
 - *Career and talent development, performance evaluation, training, planning and monitoring of training requirements and career development activities and skills, promotions, reviewing employment decisions.*
 - *Managing disciplinary matters, grievances and terminations, providing employment references.*
 - *Making business travel arrangements, managing business expenses and reimbursements.*
 - *Creating and maintaining internal Employee directories and personnel files.*
 - *Facilitating communication with Employees.*
- *Organisational Analytics, Management Reporting: Performing organisational analysis and planning including:*
 - *Performing Employee surveys,*
 - *Performing analytics for succession planning, workforce management, and data security, to ensure business continuity, to design Employee retention programs and diversity initiatives, and to offer training opportunities*
 - *Management reporting and analysis.*
- *Health, Safety and Security: Protecting the health, safety and security of Employees and assets, including:*
 - *Occupational safety and health.*
 - *Protecting company and Employee assets.*
 - *Authentication of Employee status and access rights.*
 - *Safeguarding and maintaining IT infrastructure, office equipment, facilities and other property,*
 - *facilitating communication with Employees and their nominated contacts in an emergency.*
- *Business Process Executions and Internal Management: Business operation and internal management activities including:*
 - *Scheduling work, recording time, allocating company assets and human resources, strategic planning, project management*
 - *Managing sickness leave, vacation, parental leave and other absences*
 - *Managing company assets*
 - *Providing central processing facilities for efficiency purposes*
 - *Conducting audits and investigations, compilation of audit trails and other reporting tools*
 - *Maintaining records relating to business activities, budgeting, financial management and reporting, communications, implementing business controls, managing and using Employee directories, archiving, insurance, processing for legal or business consulting*
 - *Managing mergers, acquisitions, sales, re-organizations or disposals and integration with upon mergers or acquisitions and divestitures*
 - *Operating and managing the IT, communications systems and facilities*
- *Compliance: Processing of Employee Data as necessary for the performance of a task carried out to comply with a legal obligation or sectorial recommendation to which FrieslandCampina is subject, including:*



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- *Income tax and national insurance deductions,*
- *Record-keeping and reporting obligations, conducting audits*
- *Compliance with government inspections and other requests from government or other public authorities,*
- *Responding to legal process such as subpoenas, pursuing legal rights and remedies, defending litigation, and managing any internal complaints or claims*
- *Conducting investigations including Employee reporting of allegations of wrongdoing*
- *Complying with internal policies and procedures.*

Consumer, Customer, Supplier, Member and Business Partner Data:

- *Business communication: Communicating with (prospective) Consumers or Customers, such as, answering questions or replying to communications.*
- *Concluding and executing agreements: Administrative processes, such as, negotiation and contracting, recording delivered services, products and materials to and from FrieslandCampina, sending invoices, making payments, delivering or receiving services, products or materials, including related Consumer or Customer services.*
- *Managing Supplier and Business Partner relationships: Developing, maintaining, and expanding FrieslandCampina's relationships with Suppliers and Business Partners, negotiating and contracting, managing delivery of and payment for services, products, and materials to and from FrieslandCampina.*
- *Website and/or app usage: Providing functionalities of websites and apps, including administering web shop/ loyalty programme accounts, improving performance, saving preferences or products, enabling sharing functionalities, provide targeted content.*
- *Compliance with law: Complying with legal obligations or sectorial recommendation to which FrieslandCampina is subject, such as, tax or business conduct related obligations; the disclosure of Personal Data to government institutions or supervisory authorities in relation thereto.*
- *Protecting health, safety, security and ensuring integrity: Safeguarding the health and safety of FrieslandCampina Employees, Consumers, Customers, Suppliers, and Business Partners and products, such as, via the authentication of Consumer, Customer, Supplier or Business Partner status, collecting entry declaration for security hygiene and other access controls to FrieslandCampina's systems, premises and production facilities, and protecting FrieslandCampina and Employee assets.*
- *Business process execution and internal management: General management, order management and asset management, such as, leveraging central processing facilities in order to work more efficiently, conducting audits and investigations, implementing business controls, managing and using Consumer, Customer, Supplier and Business Partner directories, finance, accounting, archiving, insurance, legal and business consulting, enforcing contracts; preventing, preparing for, or engaging in dispute resolution.*
- *Organizational analysis and development, management reporting, and acquisitions and divestitures: Aggregating or anonymizing Consumer or Customer data to prepare and perform management reporting and analysis, processing Consumer or Customer data in the context of mergers, acquisitions and divestitures and in order to manage such transactions.*

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- *Development and improvement of products and services: Measuring, analysing and improving products, using and combining Consumer or Customer data to analyse Consumer or Customer behavior and to adjust products accordingly; compiling analytics reports on the use of company websites or apps, assessing (online) campaigns, and advertisements based on Consumer or Customer interaction, and adjust products accordingly, to ensure that it is relevant to Consumers or Customers; analysing how often Consumers or Customers read newsletters and how often they visit company websites or apps and which pages they click on.*
- *Relationship management and marketing: Maintaining and promoting contact with current and prospective Consumer, Customers, Suppliers, Members, and Business Partners by sending newsletters, offers, or other relationship management or marketing communications including promotions or invitations to events, administering events, promotions, loyalty programs, sweepstakes, surveys, tastings, panels and contests, calculating rewards in loyalty programmes, providing Consumer or Customer service, performing account management, and communicating recalls, developing, executing and analysing market surveys and marketing strategies, providing access to FrieslandCampina offices and production facilities.*
- *Administering events and promotions: Communicating about promotions and inviting (prospective) Consumers or Customers to participate in contests, and events, confirm Consumer or Customer registration, verifying eligibility, organizing and administering events, and measuring response to contests, events, and/or promotions based on Consumer or Customer participation rates.*
- *Social media connections: Communicating with (prospective) Consumers or Customers on social media, if connected with the company social media account, analyse and measure consumer population, processing 'likes' on company websites and mobile apps, other social media interaction, such as liking the company social media page or participating in social media events or contests.*

e. Categories of data subjects concerned by the transfer:

The categories of data subjects whose Personal Data are Processed under this Privacy Code are:

- *Consumers: Third Parties that are natural persons who purchase, may purchase or have purchased a FrieslandCampina product or service.*
- *Customers: Third Parties, other than Consumers, that purchase, may purchase or have purchased a FrieslandCampina product or service.*
- *Suppliers: Third Parties that provide goods or services to FrieslandCampina (e.g. an agent, consultant or vendor).*
- *Members: Natural and legal persons associated with Royal FrieslandCampina's parent company Zuivelcoöperatie FrieslandCampina U.A. through their membership of, and supply agreements with, Zuivelcoöperatie FrieslandCampina U.A.*
- *Business Partners: Third Parties, other than Consumers, Customers, Members or Suppliers, that have or had a business relationship or strategic alliance with FrieslandCampina (e.g. joint marketing partner, joint venture or joint development partners).*
- *Employees: EMPLOYEE shall mean the following persons:*

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- (i) *an employee, job applicant or former employee of FrieslandCampina. This term does not include people working at FrieslandCampina as consultants or employees of Third Parties providing services to FrieslandCampina.*
- (ii) *a (former) executive or non-executive director of FrieslandCampina or (former) member of the*
- *Dependants: DEPENDANT shall mean the spouse, partner or child belonging to the household of the Employee or emergency contact of the Employee.*

Those categories are specified in Annexes 1 and 2 to the BCRs (both Codes).

f. Categories of personal data transferred:*Category of Employee Data:*

- *Basic personal details: Name, Employee identification number, work contact details (email, phone numbers, physical office address)*
- *Other personal Details: Home contact details (email, phone numbers, physical address), language(s) spoken, gender, date of birth, national identification number, social security number, marital/civil partnership status, domestic partners, dependents, emergency contact information*
- *Documentation required under immigration laws: Citizenship, passport data, details of residency or work permit*
- *Relationship details: Term of employment and/or termination date and reasons, work history (current and former employers), hire/re-hire, position as a (former) member of the board, and position of (former) shareholders*
- *Compensation and payroll: Base salary, bonus, benefits, details on stock appreciation rights and other awards, compensation type, currency, pay frequency, effective date of current compensation, salary reviews, banking details*
- *Performance data: Performance and development reviews; information for talent development programs and diversity programs, details on performance management ratings, planned or attended development programs*
- *Position information: Description of current position, job title, company name (legal employer entity), branch/unit/department, location, employment status and type, full-time/part-time, terms of employment, employment contract, length of service, retirement eligibility, promotions, and disciplinary records*
- *Recruitment information: Details contained in letters of application and resume/CV (previous employment background, education history, professional qualifications, language and other relevant skills, certification, certification expiration dates), application status*
- *Operational information: Working time records (including vacation and other absence records, leave status) staffing information, onboarding and offboarding information, relocation services, security information, information relating to internal investigations, risk-management information, health, and safety information.*



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- *System and application access data: Authentication information, information required to access company systems and applications such as user and system IDs for company network or servers, email account, and passwords.*
- *Racial or ethnic data: Photos (e.g. a copy of a passport containing a photo) and video images which, in some countries, qualify as racial or ethnic data, diversity and inclusion information*
- *Physical or mental health data: Any information on physical or mental health and data relating to disabilities, disability status, and absence due to illness or pregnancy*
- *Criminal data: Information relating to criminal behavior, criminal records or proceedings regarding criminal or unlawful behavior*
- *Sexual preference: Information on sexual preference*
- *Religious or philosophical beliefs: Information on religious or philosophical beliefs, church affiliation*
- *Trade union membership: Information of trade union membership of Employee*
- *Biometric data: Data resulting from specific technical processing relating to the physical, physiological or behavioral characteristics of a natural person, which allow or confirm the unique identification of that natural person*

Category of Consumer, Customer, Member, Supplier and Business Partner Data

- *Basic Personal details: Name, organization, business addresses and telephone numbers, e-mail addresses, mobile phone numbers.*
- *Other Personal details: Home addresses and telephone numbers, date of birth, age, gender, region, profession, web shop account information, VCA, entry declaration for securing hygiene.*
- *Business communications: Information included in requests from, or correspondence with, a (prospective) Consumer or Customer, online interactions with FrieslandCampina.*
- *Other interaction information: Information collected in contests, events and loyalty programmes, such as loyalty programme account information, Consumer or Customer information on cashback actions, prize contests, sweepstakes, tastings, panels and organised excursions to farms.*
- *Relationship data: Terms of contract, services or products delivered, purchase history, data generated during the performance of the agreement.*
- *Analytics information: Information about the use of and interactions with FrieslandCampina's website, apps, newsletter, and online advertisements including IP address, click and surf behavior, device information, geolocation information, and responses to Consumer or Customer surveys.*
- *Payment information: (Outstanding) invoices, bank account number, wire transfer details, payment history.*
- *Transaction information: Information about transactions, billing and shipping information.*
- *Company information: Chamber of commerce details, VAT details, tax details, which may include personal data for independent contractors or other small businesses.*
- *Security information: Security, authentication, fraud prevention, and risk-management related data.*
- *Identification numbers: Social security number, driver's license number, passport number, and other government issued identifiers.*



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- *Compliance information: Records related to individuals' preferences (marketing preferences, consent documentation) and data subject rights requests.*
- *Social Media information: Username, profile photo, place of residence, email address and gender.*

Those categories are specified in *Appendix 2 to the BCRs (both Codes)*.

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The BCRs are made up of two documents: the FrieslandCampina Privacy Code for Employee Data and the FrieslandCampina Third Party Privacy Code, which together make up the Controller BCRs. Both are annexed to this decision.

ANNEX 2 A TO THE DECISION

Copy of the Controller BCRs of **FrieslandCampina**.
FrieslandCampina Privacy Code for Employee Data

ANNEX 2 B TO THE DECISION

Copy of the Controller BCRs of **FrieslandCampina**.
FrieslandCampina Third Party Privacy Code