

# Job Applicant Privacy Policy

Effective June 16, 2026

## INTRODUCTION

This Privacy Policy describes how and why we process any Personal Data we collect about you when you visit our careers site, apply for a role with us, or otherwise interact with us in relation to recruitment activities. If you interact with us in other contexts, such as when you are a consumer, our processing of data collected in that situation is governed by a different policy.

ASR Group International, Inc. is a holding company that operates through its subsidiaries. This policy applies to job applicants of the subsidiaries of ASR Group International, Inc. The controller in each instance may be different, depending on the job you are applying for:

- In the UK, the controller is T&L Sugars Limited
- For Spain and Portugal, the controller is Sidul Açúcares, Unipessoal, Lda
- In the United States, the controller is Florida Crystals Corporation

By applying for a job with us, you accept the practices described in this Privacy Policy (as amended from time to time). If you do not agree with these practices, please do not continue with your job application.

## COLLECTION

Personal Data is generally any information that could be used to identify you in some way. The Personal Data that we collect from or about you may include but is not limited to the following:

- Your name;
- Your address;
- Your e-mail address;
- Your phone number;
- Your financial information (including your bank details);
- Information about your work experience, skills and attributes, education information, and any other related information contained in your CV;

- Demographic information;
- Records made of any interviews we have with you;
- Information about you derived as part of the recruitment process;
- Information about your visit to our careers website, including information about how and when you came to visit our websites, how you interacted with the websites (products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information such as scrolling, clicks, and mouse-overs), and where you went next (including full URLs and methods used to browse away from the site); and
- Technical information about the way that you use the web, including the internet protocol (IP) address or other device identifier, your login information if you register on our website or via our app, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, device information.

## **FAILURE TO PROVIDE PERSONAL INFORMATION**

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualification or work history) or if you provide inaccurate, incomplete or misleading information, we may not be able to process your application.

## **SOURCES**

We collect this information from you, your references, your former employers, and service providers who may assist us in our recruiting activities.

## **USE & RETENTION**

We use your Personal Data for the following purposes:

- Applicant Evaluation. We use your Personal Data to manage the hiring process, including evaluating and communicating with individuals who apply for positions we advertise, because ensuring that we recruit the right people to join our team is in our legitimate interests.
- Administrative Operations. We use your Personal Data for administrative purposes—such as ensuring that our recruitment processes and careers site works properly, information is presented in the most effective/relevant manner for you, and the recruitment experience is tailored based to the way that you engage with us—because doing so is in our legitimate interest.
- Security and Legal/Compliance. We use your Personal Data for security and legal/compliance purposes. This may involve us using your data to fulfil a legal

obligation (such as responding to a legitimate request from law enforcement). In other situations, such as the detection of fraud or ensuring the security of the site, we will rely on our legitimate interests to use your Personal Data. This recognized Legitimate Interest is under the Data Use and Access Act 2025.

- We may also processing special category or “sensitive” data for purposes like performing credit checks, where required by law and/or with your consent.

We will only retain your Personal Data for as long as necessary to fulfil the purposes for which it was collected and it will be securely disposed or deleted in accordance with our company records retention policy or as otherwise required by law.

## **DISCLOSURES**

We do not sell Personal Data.

We may disclose Personal Data to certain companies (such as your references, your former employers, or the businesses we partner with to help us assess applicant suitability to a certain role) that assist us in maintaining and managing our recruitment activities. Such disclosures are consistent with our legitimate business interests. These vendors are only given access to the information they need in order to perform the specific tasks they have been hired to do and are prohibited from using your Personal Data for any other purpose.

In the event of a merger or acquisition of all or part of our company or assets, the acquirer may have access to the information previously maintained by us, which could include your Personal Data. Similarly, any information in our possession, including your Personal Data, may be transferred to another party entity as part of a corporate reorganisation, insolvency proceeding, or other similar event.

## **TRANSFERS**

The data that we collect from you may be transferred to, and stored at, a destination outside of your home jurisdiction. It may also be processed by staff operating outside your home jurisdiction or for one of the third parties we work with. Any restricted transfers are conducted pursuant to contracts that comply with relevant data protection laws and regulations. We only transfer your Personal Data to countries that guarantee adequate protection, based on appropriate safeguards or another statutory exemption provided by local applicable law.

## **CHILDREN’S PRIVACY**

We do not knowingly solicit or collect personal or other information from children under the age of 13 through our website. If we learn at any time that we have inadvertently collected Personal Data from such a child, we will promptly delete the information from our records.

## WEB BEACONS AND COOKIES

We use cookies, web beacons and similar technologies (“Cookies”) on our Site and in certain email communications. We use web beacons or other similar technology (“Beacons”) on our careers site and in some email messages we send you. Beacons are small strings of code that provide a method of delivering a graphic image on a web page or in an email message for the purpose of transferring data back to us. The information collected via Beacons may include information about how a user responds to an email campaign (for example, the time the email is opened, where does the user link to from the email, etc.). We use Beacon information for a variety of purposes, including but not limited to, website traffic reporting, unique visitor counts, advertising and email auditing and reporting, and personalisation.

Cookies are small text files placed on your device, and web beacons are small pieces of code that allow information to be transmitted back to us. A “cookie” is a non-executable element of data that a website stores on your browser or your computer’s hard drive. These cookies, among other things, help us to improve the site and provide you with a good user experience. We use three types of cookies: strictly necessary cookies, analytical/performance cookies, and targeting cookies. You can learn more about each type below.

Strictly Necessary Cookies. These are cookies that are required for the operation of our website, including the careers site. They include, for example, cookies that enable you to log into secure areas of the website:

JQuery Cookies: a plugin for reading, writing and deleting cookies.

Datepicker Cookies: allows users to sort events by date.

Big Pipe Module Cookies: allows us to flush the initial page first, and then stream the replacements for the placeholders. This results in hugely improved front-end/perceived performance.

Comment Module Cookies: When enabled, the Drupal comment module creates a discussion board for each Drupal node. Users can post comments to discuss a forum topic, weblog post, story, collaborative book page, etc.

Cookies for testing: uploads a test to a private node and checks access for development purposes.

Hal Module: When enabled, the HAL module serializes entities using HAL (Hypertext Application Language).

History Module: verifies that the history endpoints work.

Zend: provides methods for parsing HTTP response strings, collecting cookies, and easily accessing their properties. It also allows checking if a cookie matches against a specific scenario, IE a request URL, expiration time, secure connection, etc.

Symfony: facilitates long-term maintenance and scalability by complying with standard development rules.

Squizlabs: a client-side JavaScript application that checks a HTML document or source code, and detects violations of a defined coding standard.

Phantom JS: used for automating web page interaction.

Guzzle: a PHP HTTP client that makes it easy to send HTTP requests and trivial to integrate with web services.

Analytical/Performance Cookies. These Cookies collect aggregated statistical information to help us understand how the Site is used. Where they are used solely for analytics and site improvement purposes, they do not require consent. You may opt out at any time using our cookie settings.

Google Analytics: allows anonymous recognition, counts number of visitors and sees visitor movement around the site to help improve how the website works. To disable Google Analytics in your browser click [here](#).

Hotjar: anonymously tracks movement and user behavior on our site. To disable Hotjar in your browser, click [here](#).

Optimizely: allows us to do A/B testing of assets and gather data anonymously on how certain assets performed. To opt out of Optimizely A/B testing, click [here](#).

ShareThis: allows users to share pages from the site to their social channels or email while anonymously gathering data on which social channels are used most frequently. To disable ShareThis data tracking, you can opt out [here](#).

Skyglue: a Google Analytics extension that allows anonymous recognition and tracks how users are interacting with the site. To disable Skyglue in your browser, you can opt out [here](#).

Functionality cookies. These are used to recognise you when you return to the website. This enables us to personalise our content for you, greet you by name and remember your preferences.

Targeting Cookies. These Cookies are used for advertising and targeting purposes and are only placed with your consent. You can manage your Cookie preferences through our cookie settings at any time, or via your browser. We will use this information to make the website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

DoubleClick: this a product from Google that allows the personalization of ads based on pages a consumer visits. To disable DoubleClick in your browser, you can opt out [here](#).

AGKN: enables real time targeting and aggregates anonymous ads based on the user's preferences. To disable AGKN in your browser, you can opt out [here](#).

If you continue to use the website you agree to our use of cookies. If you do not wish to have cookies on your computer, then you should disable cookies on your browser settings and delete cookies already stored. However, if you use your browser settings to block all cookies (including strictly necessary cookies), certain features of the website may not function properly, and your experience of the website may be less enjoyable. Unless you have adjusted your browser settings so that it will refuse cookies, cookies will be issued as soon as you visit the website.

## **SECURITY OF INFORMATION**

We take seriously the safety of your Personal Data. We use security measures designed to prevent the loss, misuse, unauthorized access, and alteration of your personal information under our control. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot warrant or guarantee the security of your data transmitted to our website; any transmission is at your own risk.

## **YOUR RIGHTS**

Under the Act and data protection laws, you have the following rights:

1. Right to erasure: the right to have your personal data deleted (in certain circumstances).
2. Right of access: the right to access and request a copy of your personal data that we hold about you.
3. Right to be informed: the right to be informed about the collection and use of your personal data.
4. Right to rectification: the right to review any personal data that we may have collected and have it corrected.
5. Right to restrict processing: the right to request the restriction or suppression of your personal data (in certain circumstances).
6. Right to data portability: the right to obtain and reuse your personal for your own purposes.
7. Right to object: the right to object to the processing of your personal data (in certain circumstances).
8. Right to Complain: the right to complain about how your personal data has been processed.

If you wish to exercise these rights, simply contact us at the address stated below in the “Get in Touch” section of this notice. We reserve the right to make a small charge for this service to meet our reasonable costs in complying with your request where the law allows. For further information on each of those rights, including the circumstances in which they apply, please contact us or see the [Guidance from the UK Information Commissioner \(formally the Information Commissioner’s Office \(ICO\)\) on individuals’ rights under the General Data Protection Regulation](#).

You also have the right to raise a complaint with us if you believe we have infringed your data protection rights under the Act or the Data Protection Act 2018. This right arises under the Data (Use and Access) Act 2025 (DUAA).

You can submit a complaint to us using our complaints form [T&L Sugars Personal Data Complaint Form \(PDF\)](#), by email to [DPO@asr-group.com](mailto:DPO@asr-group.com) or by post to T&L Sugars Limited, ATTN: Legal Department, Thames Refinery, Factory Road, Silvertown, London, E16 2EW. UK.

To help us investigate your complaint effectively, we may ask you to provide:

- any relevant evidence or supporting information about the issue you are raising;
- proof of your identity, where necessary, to ensure we are dealing with the correct individual; and
- proof of authority if you are submitting a complaint on behalf of someone else.

We will acknowledge your complaint within 30 days of receiving it and will take appropriate steps to investigate it without delay. During the investigation, we will keep you informed of the progress of your complaint and once concluded, we will explain the outcome to you.

If you are dissatisfied with our response, you may escalate your complaint to the Information Commission (formerly the Information Commissioner’s Office (ICO)) after we have completed our investigation.

## **LINKS TO OTHER SITES**

We do our best to make sure that every link on our website sends you to a safe place on the Internet. However, we cannot and do not guarantee the content or privacy practices of every website for which our website provides a link. We do not accept any responsibility or liability for these policies, please check these policies before you submit Personal Data to these websites.

## **CHANGES TO THE PRIVACY POLICY**

From time to time, we may make changes to our Privacy Policy. If we do make changes, the changes will be posted on this page, and we will indicate at the top of this Privacy

Policy when the changes went into effect. We encourage you to come back to this website and review this Privacy Policy frequently so that you are constantly aware of our most current privacy practices.

In the event we want to materially change how we use Personal Data which you have previously provided to us, we will notify you by email or by way of a notice on the website and may give you a choice to consent to or opt out from the desired change. Your continued use of this website after any such notification, or your explicit consent to any changes for which we require your prior approval, will signify your agreement with these changes.

## CONTACT US

If you have any questions or concerns about this Privacy Policy or our handling of your Personal Data, please contact us at:

### **T&L Sugars Limited**

Attention: Legal Department  
Thames Refinery  
Factory Road  
Silvertown  
London, E16 2EW, UK  
Phone: +44 (0) 207 476 4455  
Fax: +44 (0) 207 540 1848  
Email: [privacy@asr-group.com](mailto:privacy@asr-group.com)

### **ASR Group - Mexico**

Attention: Legal Department  
Boulevard Manuel Ávila Camacho No. 66, 5th floor  
loc. 601 and 601 "A",  
Col. Lomas de Chapultepec, 11000  
Mexico City, Mexico  
Phone: +5552848170  
Email: [privacy@asr-group.com](mailto:privacy@asr-group.com)

### **Sidul Açúcares, Unipessoal, Lda**

Attention: Legal Department  
Quinta do Ferral  
Estrada Nacional Nº 10 - Km 10.6  
2690-364 Stª Iria De Azóia  
Portugal  
Phone: +44207257 9643  
Email: [privacy@asr-group.com](mailto:privacy@asr-group.com)

### **ASR Group - Belize**

Attention: Legal Department  
Tower Hill  
Orange Walk District  
Belize, CA  
Phone: +501 321-9020  
Email: [privacy@asr-group.com](mailto:privacy@asr-group.com)

### **Florida Crystals Corporation**

Attention: Legal Department  
One North Clematis Street, Suite 200  
West Palm Beach, FL 33401  
Phone: 561-366-5100  
Fax: 561-366-5180  
Email: [privacy@floridacrystals.com](mailto:privacy@floridacrystals.com)