

PRIVACY POLICY

KELANI VALLEY PLANTATIONS PLC

Last updated: July 2026

At **KELANI VALLEY PLANTATIONS PLC** ("KVPL", "we", "our" or "us"), protecting your privacy and maintaining the confidentiality of your personal data is a priority. We process personal data in accordance with applicable laws, including the Personal Data Protection Act, No. 9 of 2022, as amended, and other applicable legal and regulatory requirements.

You are generally not required to provide personal data merely to browse our website. However, certain technical information may be collected automatically, and you may be asked to provide personal data when you contact us, make a product or business enquiry, engage with us as a customer, buyer, supplier or service provider, apply for employment, visit our offices, factories or estates, attend an event, or communicate with us through email, telephone or social media.

Where personal data is requested, we will use it only for identified and legitimate purposes. This Privacy Policy explains how we collect, use, disclose, retain and protect personal data. It should be read together with any specific privacy notice provided at the point of collection. Where a related company, third-party platform or external website has its own privacy notice, that notice will apply to its processing activities.

1. INFORMATION WE COLLECT

We may collect personal data directly from you, automatically through your interaction with our website and digital platforms, from organisations you represent, from business partners and service providers, or from lawful publicly available sources. Depending on your relationship with KVPL, the information may include:

- **Personal identification and contact information:** name, postal address, email address, telephone number, signature, National Identity Card or passport details where identification is required, and other relevant contact details.
- **Business and transactional information:** organisation, designation, customer or supplier details, quotations, purchase or sales orders, invoices, delivery information, payment records, bank details where required, product preferences and transaction history.
- **Recruitment information:** curriculum vitae, application details, qualifications, employment history, references, interview records and other information submitted during recruitment.
- **Technical and usage information:** IP address, browser and device type, operating system, cookies, pages visited, date and time of access, referral information and website security logs.
- **Communication and marketing information:** records of emails, telephone calls, correspondence, enquiries, complaints, survey responses, feedback and communication preferences.
- **Visitor and security information:** visitor registration details, vehicle information, photographs, event records and CCTV images captured at KVPL premises, where applicable.

2. USE OF YOUR PERSONAL DATA

We may use personal data to respond to enquiries; provide information about our tea, rubber and other products and services; manage customer, buyer, supplier and business-partner relationships; process quotations, orders, deliveries, payments and accounts; assess job applications; manage visits and events; maintain the safety and security of our premises and systems; communicate approved corporate or marketing information; conduct audits and internal reporting; prevent fraud and misuse; establish or defend legal claims; comply with legal and regulatory obligations; and improve our website, operations, products and stakeholder experience.

We will not use personal data for purposes that are incompatible with the purpose for which it was collected, unless permitted by law or communicated to you through an appropriate additional notice.

3. LEGAL BASIS FOR PROCESSING PERSONAL DATA

KVPL processes personal data only where an appropriate legal basis applies. Depending on the activity, this may include:

- **Performance of a contract or pre-contractual steps:** processing necessary to respond to a request, prepare a quotation, enter into or perform an agreement, supply products or receive services.
- **Consent:** processing carried out with your consent, such as certain marketing communications, photographs or optional activities. Where processing is based on consent, you may withdraw it, subject to applicable law.
- **Legitimate interests:** processing necessary for KVPL's legitimate business interests, including business administration, service improvement, information security, fraud prevention, stakeholder communication, market analysis and the protection of legal rights, provided that such interests are balanced against your rights and freedoms.
- **Legal obligation:** processing necessary to comply with laws, regulatory requirements, court orders, audit, tax, accounting, employment, health and safety, or other statutory obligations.
- **Protection of vital interests and legal claims:** processing necessary in an emergency, for the protection of an individual, or for the establishment, exercise or defence of legal claims, where applicable.

4. COOKIES AND TRACKING TECHNOLOGIES

Our website may use cookies and similar technologies to enable essential website functions, maintain security, remember preferences, analyse website usage and improve performance. Where required, you will be given a choice regarding non-essential cookies. You may also manage cookie settings through your browser; however, disabling certain cookies may affect the availability or operation of website features.

5. INTERNATIONAL DATA TRANSFERS

Personal data may be processed or stored outside Sri Lanka where KVPL uses international cloud, communication, hosting, analytics or other service providers, or where information must be shared with an overseas customer, business partner or professional adviser. Where such transfers occur, KVPL will take reasonable and appropriate steps to protect the personal data, including contractual, organisational and technical safeguards, as required by applicable law.

6. SHARING WITH THIRD PARTIES AND EXTERNAL LINKS

KVPL may disclose personal data, only where necessary and appropriate, to related Hayleys Group companies and shared-service functions; customers, suppliers and business partners; banks and payment-service providers; logistics and delivery providers; auditors, insurers and professional advisers; recruitment, information-technology, website-hosting, cloud and security service providers; regulators, law-enforcement authorities, courts and government institutions; and parties involved in a corporate restructuring or business transaction, subject to applicable safeguards.

Our website may contain links to external websites and social-media platforms. KVPL is not responsible for the privacy practices or content of those external services. You should review their privacy notices before providing personal data.

7. DATA RETENTION AND SECURITY

We retain personal data only for as long as necessary for the purposes described in this Policy, to maintain appropriate business and audit records, to comply with legal or regulatory requirements, or to establish, exercise or defend legal claims. When personal data is no longer required, it will be securely deleted, destroyed or anonymised in accordance with applicable procedures.

KVPL uses appropriate technical and organisational measures designed to protect personal data against unauthorised or unlawful access, use, disclosure, alteration, loss, destruction or damage. These measures may include access controls, user authentication, secure systems, backups, staff confidentiality requirements, monitoring and physical security. However, no method of electronic transmission or storage can be guaranteed to be completely secure.

8. UPDATES AND CHANGES TO THIS PRIVACY POLICY

We may update this Privacy Policy from time to time to reflect changes in our activities, systems, services or legal obligations. The updated version will be published on our website with the revised date. Where a change materially affects how we process personal data, we may provide an additional notice through an appropriate communication channel.

9. YOUR RIGHTS UNDER APPLICABLE LAW

Subject to the Personal Data Protection Act, No. 9 of 2022, as amended, and any applicable limitations or exemptions, you may have the right to request access to personal data held about you; withdraw consent where processing is based on consent; object to certain processing; request correction or completion of inaccurate or incomplete data; request erasure in circumstances permitted by law; request the review of a qualifying decision based solely on automated processing; and appeal or make a complaint to the Data Protection Authority where applicable.

To protect personal data, KVPL may take reasonable steps to verify your identity and authority before acting on a request. Requests will be handled without undue delay and within the period required by applicable law. Certain requests may be refused or limited where permitted or required by law, including where the rights and freedoms of another person would be affected or where information must be retained for legal, evidentiary or regulatory purposes.

10. CONTACT US

If you have questions or concerns about this Privacy Policy, believe that your personal data has been handled improperly, or wish to exercise a data-subject right, please contact us using the details below. Please use the subject line "Privacy Request" for email correspondence.

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