

Privacy Notice:

Protection of personal data

The whistleblowing procedure set up within the Soufflet Group by the WEB platform <https://groupe-soufflet.signalement.net> constitutes the processing of personal data.

This whistleblowing procedure is jointly managed, i.e. the purposes and the means of the processing of personal data have been determined by the Soufflet Group Holding Company, namely "Etablissements J. Soufflet" (RCS Troyes N° 642.880.785), in agreement with all its respective subsidiaries within the meaning of Article L. 233-3 of the French Commercial Code.

In accordance with the provisions of the General Data Protection Regulation 2016/679 of 27 April 2016 - "GDPR", this notice informs you about the methods of processing personal data in the context of the management of the above-mentioned whistleblowing procedure.

- **What are the purposes of the processing of personal data?**

Data processing is implemented to collect and process whistle-blower report to meet the following regulatory or internal requirements:

- Law of 9 December 2016, known as the "SAPIN 2" law: article 6 et seq. and article 17, II, 2°;
- Decree n° 2017-564 of 19 April 2017 ;
- Recommendations of the French Anti-Corruption Agency adopted pursuant to Article 3, 2° of the "SAPIN 2" law;
- Code of conduct of the Soufflet Group.

Information collected for one of these purposes may not be reused for any other purpose that is incompatible with those purposes.

- **What legal basis allows us to use your personal data?**

Article 6, 1, c et f of the GDPR:

- The Soufflet Group's compliance with a legal obligation provided for by the "SAPIN 2" law;
- The realization of the legitimate interest pursued by the Soufflet Group, this interest consisting in preventing risks related to our activities, subject to respect for the fundamental rights and freedoms of the data subjects.

The legitimate interest of the Soufflet Group may also result from its right to take legal action as a victim, defendant or on their behalf.



- **What are the data and categories of data subjects?**

Categories of personal data :

- If applicable, identity, functions and contact details of the whistle-blower;
- If applicable, identity, functions and contact details of the persons who is subject of allegations;
- In all cases, the identity, functions and contact details of the persons involved in the processing of the whistle-blower report;
- The facts reported, and the evidence gathered in the course of verifying the facts reported;
- The reports of the verification operations;
- The follow-up given to the alert may include data relating to offences and security measures concerning natural persons.

Category of persons who may be concerned by the processing operation:

- Whistleblowers ;
- People who are the subject of the whistle-blower report;
- Persons involved in the processing of whistle-blower report.

- **What are the data sources?**

Data are collected from the whistle-blower.

No one personal data is required to perform a whistle-blower report. However, answers to the following questions are necessary, to meet the provisions of the current regulations relating to the status of whistleblowers:

- Title of the whistle-blower report;
- On what date did the events take place?
- How did you hear about the situation?
- Location of the situation or facts;
- This is the first time this situation has been observed.

The platform does not provide for automated decision-making.



- **With whom do we share your personal data?**

Personal data may be communicated within the Soufflet Group if such communication is necessary for the sole purpose of verifying or processing the whistle-blower report.

In this context, personal data are only accessible to Group employees who are authorized to know them in accordance with their duties. These are the people specifically responsible for managing alerts within the Group, who intervene after signing an enhanced confidentiality agreement.

The whistle-blowing procedure is accessible through the WEB platform provided by VALEUR & CONFORMITÉ, (RCS Paris 829 551 878), acting on behalf of the Soufflet Group as a processor within the meaning of the RGPD.

In addition, when additional investigations are required to process certain whistle-blower report, we may need to use external service providers specialized in this field of activity.

In the latter two cases, i.e. the subcontracting of the technical solution for the whistle-blowing procedure and the possible use of external experts, contractual commitments providing for a high level of requirement regarding confidentiality obligations must be put in place.

Consequently, all our service providers undertake, by contract, not to use the data for purposes other than alert management, to ensure their confidentiality, to respect the limited period of data storage and to destroy all manual or computerized personal data at the end of the service.

Your personal data may be disclosed in accordance with a law, regulation, decision of a regulatory or judicial authority and finally, if necessary for the Group, in order to protect its rights and interests.

Finally, no one data transfers outside the European Union are carried out.

- **How long do we keep your personal data?**

Three situations should be distinguished:

- If the whistle-blower report is inadmissible, related documentation is immediately archived after anonymization for one year, then destroyed.
- In the absence of disciplinary or judicial action, the documents in the file shall be anonymized and archived within two months of the closure of the verification operations. They are archived for 3 years, then destroyed.
- When disciplinary or contentious proceedings are initiated against the person implicated or the author of the abusive whistle-blower report, the documents and information shall be kept as they stand until the end of the proceedings and the remedies have expired, then archived for a period of 3 years after anonymization, and then destroyed.

Data may be stored for a longer period of time, in intermediate storage, if the Group has a legal obligation to do so (for example, to meet accounting, social or tax obligations) or if it wishes to obtain evidence in the event of litigation and within the applicable limitation/exclusion period.



- **What are your rights and how can you exercise them?**

Pursuant to the applicable legal and statutory provisions, you have a right of access, rectification, portability and erasure of your data, and also a right to restrict processing of them.

You can also, for legitimate reasons, object to data relating to you being processed. However, the person who is the subject of allegation may not object to the processing of his or her personal data, in accordance with the provisions of Article 21 of the GDPR. This person may only object to the processing of her personal data in the event of an error and by proving that her data do not or no longer need to be processed.

The person who is the subject of allegations cannot under any circumstances obtain information concerning the identity of the whistle-blower based on his right of access.

In general, when people exercise their access rights, they cannot, through the exercise of this right, obtain access to any data relating to third parties.

All these rights, subject to the production of a valid proof of identity, can be exercised by writing to dpo@soufflet.com.

If you feel that your request has not been treated with the necessary care, you have the right to refer the matter to the French Data Protection Authority (more information on www.cnil.fr). However, we invite you to contact us before submitting a complaint to the French Data Protection Authority.

