

PROTECTION OF THE PERSONAL DATA USED IN THE CONDAT GROUP'S ALERT SYSTEM

This privacy policy sets out and informs you of the way in which CONDAT and its subsidiaries use and protect the information that you provide to us, if any, when you use the internet platform dedicated to ethics, accessible from the following URL: <https://www.signal.condat.fr> (hereinafter the "Site").

Please note that this privacy policy may be modified or supplemented at any time by CONDAT, in particular in order to comply with any legislative, regulatory, jurisprudential or technological developments. In such a case, the date of the update will be clearly identified at the top of this policy. These modifications are binding on the User as soon as they are put online. It is therefore advisable for the User to regularly consult this confidentiality policy in order to take note of any changes.

In general, you can visit the Site without communicating any personal information about yourself. In any case, you are in no way obliged to transmit this information to CONDAT.

Nevertheless, in case of refusal, you may not be able to benefit from certain information or services that you have requested. In this respect, CONDAT may in certain cases ask you to provide your surname, first name, address, e-mail address, telephone number and company (hereinafter referred to as your "Personal Information"). By providing this information, you expressly agree to it being processed by CONDAT, for the purposes indicated in point 2 below and for the purposes stated at the end of each form.

In accordance with the General Data Protection Regulation (GDPR) adopted by the European Parliament on 14 April 2016, and the amended Data Protection Act of 6 January 1978, CONDAT informs you of the following:

1. Identity of the controller

You can join the person in charge of the processing is the company CONDAT, to the registered office, 104 avenue Frédéric Mistral - 38670 CHASSE /RHONE – France, to the attention of DPO or by email at : rgpd@condat.fr

2. Purposes of the processing

The information collected is intended to fulfil the obligations of the group or its following subsidiaries:

- Set up a whistleblowing system in accordance with the Sapin II law (French obligation at group level).
- Set up a warning system due to local regulations or threshold effects.

The information is collected and processed for the purpose of assessing the admissibility of the whistleblowing report, verifying the facts, and taking appropriate action if necessary.

3. Recipients

Data is only processed by authorised persons. These are the persons responsible at group level for Compliance, CSR and Human Resources. If necessary, they may be assisted by professionals bound by professional secrecy or confidentiality agreements.

This information is not passed on to third parties except:

- if the whistleblower gives his or her consent,
- If the alert is well-founded, the information can then be passed on to the judicial authorities responsible for the person concerned.

4. Nature of the information collected

The Site allows alerts to be sent anonymously or by identifying oneself.

When a person submits an alert indicating his or her identity, the information detailed below may be collected and stored.

When writing a whistleblower report, the whistleblower may provide Condat with personal data about him or herself and about the person(s) involved in the whistleblower report.

Finally, when processing a whistleblower report, Condat may also collect data on persons who may provide information necessary for the processing of the report (these persons may or may not have been identified by the whistleblower).

The types of personal data that may be collected and processed include

- The identity, function and contact details of the whistleblower.
- The identity, function and contact details of the person(s) involved in the alert report.
- As well as any other information voluntarily provided by the whistleblower or resulting from the processing of the whistleblower report.

Please do not provide sensitive data unless this information is a key element of your alert report.

5. Duration of storage

The data collected is kept for a limited period, depending on the purpose of the processing. The data and information provided :

- Are destroyed or anonymised without delay when they relate to an alert that does not fall within the scope defined by the Group or by the Law.
- Alerts that do not result in further investigation shall be destroyed or anonymised within two months of the date of closure of the checks.
- Are kept until the end of the procedure or the limitation period for appeals against the decision in the event of disciplinary or litigation proceedings (with regard to the person implicated or the author of an abusive alert).

Anonymised data may be retained for research or statistical purposes. In this case, it may be used indefinitely, without informing you.

6. Where personal information are stored

All information provided are stored in France.

7. Computer and Freedom Rights

In some countries, in particular within the European Union, you have the following rights regarding your Personal Information, which you may exercise by writing to us at the postal address mentioned in point 1.

7.1. Right of access and communication of data

You have the right to access your Personal Information.

However, due to the obligation of security and confidentiality in the processing of personal data incumbent on CONDAT, you are informed that your request will be processed subject to you providing proof of your identity, in particular by producing a scan of your valid identity document (in the case of an electronic request) or a signed photocopy of your valid identity document (in the event of a written request).

CONDAT informs you that it will be entitled, if necessary, to oppose requests that are clearly abusive (due to their number, repetitive or systematic nature).

To help you in your approach, in particular if you wish to exercise your right of access by means of a written request to the postal address or email mentioned in point 1, you will find a model letter in **Annex 1**.

7.2. Right to rectify data

Under this right, the law entitles you to request the rectification, updating, blocking or deletion of data concerning you which may be inaccurate, erroneous, incomplete, or obsolete.

You have the right to request the deletion or removal of your personal information if we have no reason to continue processing it. Circumstances in which you can invoke the right to be forgotten include situations where the information is no longer necessary for the purpose for which it was originally collected or processed and situations where you have withdrawn your consent to processing.

In certain limited circumstances, the right to be forgotten does not apply. If you would like to know more, please contact us.

7.3. Right to object

The exercise of this right is only possible in one of the following two situations:

1/ Where the exercise of this right is based on legitimate grounds; or

2/ When the exercise of this right aims to prevent the data collected from being used for commercial prospecting purposes.

To help you in your approach, in particular if you wish to exercise your right to object by means of a written request sent to the postal or email address indicated in point 1, you will find a model letter in **Annex 2**.

7.4. The right to restrict processing

You have the right to "block" or prevent the processing of your personal information. If you ask us to "block" your personal information, we will stop processing it.

8. Response times

CONDAT undertakes to reply to your request for access, rectification or opposition or any other additional request for information within a reasonable period of time, which may not exceed 1 month from receipt of your request.

9. Complaint to the competent authority

If you consider that CONDAT is not complying with its obligations regarding your Personal Information, you may submit a complaint or a request to the competent authority. In France, the competent authority is the CNIL to which you can send a request electronically by clicking on the following link: <https://www.cnil.fr/fr/plaintes/internet>.

The list of independent authorities in other EU countries can be found at the following link: https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm

Annex 1: request for access to data

Dear Sir or Madam,

Please let me know if you have any data about me in your computerised or manual files.

If so, I would like to receive a copy, in plain language, of all such data (including those in the 'notepad' or 'comments' areas), in accordance with Article 15 of the General Data Protection Regulation (GDPR).

[data_receipt_modalities]

origin_of_data]

Thank you for sending me your reply as soon as possible and at the latest within one month of receiving my request (Article 12.3 of the GDPR).

If you do not reply within the time limit set or if your reply is incomplete, I reserve the right to submit a complaint to the "Commission Nationale de l'Informatique et des Libertés (CNIL)".

Yours sincerely

Annex 2: request to delete personal data

Dear Sir or Madam,

Information about me is currently posted on your website on the following pages:

[urls]

Therefore, in accordance with Articles 21.1 and 17.1.c. of the General Data Protection Regulation (GDPR), I would like to thank you for deleting the following personal data concerning me:

[info_to_remove] .

I would like this information to be deleted because:

[reason_for_deletion]

I also thank you for taking the necessary steps to ensure that these pages are no longer referenced by search engines (Article 17.2 of the GDPR).

Please send me your reply as soon as possible and at the latest within one month of receiving my request (Article 12.3 of the GDPR).

Yours sincerely