

Internal Alert System – Privacy Policy

Belgian affiliates within the Roullier Group provide their stakeholders, including collaborators and business partners, with a dedicated professional alert system for Belgium (the “Internal Alert System” or the “System”)

The purpose of this document is to present the conditions under which personal data communicated or collected within the framework of the Internal Alert System is processed, from the report to the end, if necessary, of the internal investigation.

The Internal Alert System of Groupe Roullier complies with the General Data Protection Regulation (GDPR), which entered into force on 25 May 2018, as well as the resulting legal and regulatory obligations regarding personal data.

I. Personal data processed

The following personal data is processed:

- the identity, duties and contact details of the Whistleblower, the persons subject to the report or mentioned by the Whistleblower, as well as the persons involved in the collection or processing of the report,
- the internal situation of the Whistleblower, the persons subject to the report or mentioned by the Whistleblower,
- as well as any other information voluntarily provided by the Whistleblower.

The information communicated as part of the System must remain factual and have a direct link with the subject of the report.

Groupe Roullier takes all necessary measures to preserve the security and confidentiality of information at all stages of the procedure (collection, processing, storage, communication).

The identity of the Whistleblower and the persons subject to the report or mentioned in the context of the report as well as the information collected by all the recipients of the report are treated confidentially.

It is also possible to report completely anonymously. In this case, to preserve the Whistleblower's anonymity, no information on the identity of the whistleblower is required.

II. Purposes and legal bases for processing

The Internal Alert System applicable in Belgium makes it possible to denounce acts that have been committed or are likely to be committed within the Belgian affiliates of the Group, in the fields stated below :

- Public contracts ;
- Services, products, and financial markets and prevention of money laundering and terrorism financing ;
- Product safety and compliance ;
- Transport safety ;
- Environmental protection ;
- Food security, animal health and welfare ;
- Public health ;
- Consumer protection ;
- Privacy and personal data protection and network and information systems security ;
- Obstacles to tax fraud prevention ;
- Obstacles to social fraud prevention ;

III. Identity of the Data Controller

When the report is issued by a Whistleblower concerning facts involving or alleged against a Belgian affiliate of the Groupe Roullier and/or its collaborators or managers, CFPR, domiciled at 27 avenue Franklin Roosevelt 35400 Saint-Malo, registered with the Saint-Malo Trade and Companies Register under number 313 642 548, and the subsidiary concerned act as joint Data Controllers.

IV. Recipients

In accordance with the Groupe Roullier's internal whistleblowing system, the Personal Data collected is processed and first sent to the Dedicated Recipient who are, according to the capacity of the Whistleblower:

- the Head of Human Resources of the entity concerned
- the Ethics & Compliance Officer of the entity concerned
- the Group's Ethics & Compliance Officer

Lastly, it is possible that for the purposes of verifying the facts reported, external service providers may occasionally access the Personal Data. These service providers are subject to a contractual commitment of confidentiality.

V. Retention period of Personal Data

The Personal Data collected and processed within the framework of the Internal Alert System applicable in Belgium is kept only for the time strictly necessary for the purposes pursued.

Outcome of the report: When the preliminary assessment concludes that the alert does not fall within the scope of the professional alert system applicable in Belgium or that it is not serious. **Retention period :** Unless the report is made in bad faith, the data concerning the alert is immediately destroyed or anonymized.

Outcome of the report: When the report is deemed admissible but no further action is taken. **Retention period:** Personal data from said report will be deleted or anonymized within a maximum period of two months from all admissibility or verification operations.

Outcome of the report: When the report is deemed admissible and further action is taken. **Retention period:** The collected data will be retained or archived for the duration of the statute of limitations (10 years for crimes, 6 years for offenses, and 1 year for other law violations), and in the event of litigation, until the expiration of the procedural deadlines (including appeal periods) within a separate and restricted access information system, after which they will be destroyed or anonymized.

VI. The rights of data subjects

Pursuant to Articles 15 et seq. of the GDPR, any data subject whose Personal Data is collected and processed by means of the Internal Whistleblowing System has the right to request from CFPR (or any of its subsidiaries when the report is issued by a Whistleblower concerning facts involving or alleged against the subsidiary concerned and/or its employees or managers), access to their Personal Data, their rectification and, if the conditions are met, their erasure, a limitation of their processing, the right to object to said processing and the right to the portability of their Personal Data.

Given the Groupe Roullier's legal obligation to address internal reports, you should note that it will not be possible to object to the processing of your Personal Data, for the purposes of processing the report once it has been issued.

The person who is the subject of a report may not under any circumstances obtain communication from the Data Controller, on the basis of their right of access, of the information concerning the identity of the Whistleblower.

To exercise your rights or for any question relating to the processing of your Personal Data, as part of the Internal Alert System applicable in Belgium you may contact the data protection officer at the following address :

For Timac Agro Belux and Timab Belgique vincent.iasenzaniro@roullier.com.

In any case, any concerned person may contact the DPA, Data Protection Authority, for any claim or complaint regarding the processing of their personal data.