

Politique de confidentialité du Dispositif d'alerte interne

Groupe Roullier, concerned about compliance with the principles and commitments set out in its Code of Ethics & Compliance, its Ethics & Compliance Charter and its Partner Ethics & Compliance Charter, has made available to its stakeholders, in particular its employees and commercial partners, an internal whistleblowing system (the "Internal Whistleblowing 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 Whistleblowing System is processed, from the report to the end, if necessary, of the internal investigation.

The Internal Whistleblowing 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 whistleblowing 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 whistleblowing system is intended to allow the collection of reports relating to:

- a violation of one of the principles referred to in the Code of Ethics & Compliance and the Group's Partner Ethics & Compliance Charter, in particular with regard to financial and accounting fraud, personal law, anti-competitive practices, anti-corruption, embargo, product safety or disclosure of confidential information,
- a crime or an offence,
- a violation or an attempt to conceal a violation of an international commitment applicable in France (such as conventions adopted by the International Labour Organization), a unilateral act implementing said commitment (European Union standards, for example), or the law or regulation,
- a threat or damage to public interest.

III. Identity of the Data Controller

When the report is issued by a Whistleblower concerning facts involving or alleged against CFPR and/or its employees 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, acts as Data Controller.

When the report is issued by a Whistleblower concerning facts involving or alleged against a subsidiary of the Groupe Roullier and/or its employees and managers, CFPR 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 Whistleblowing System is kept only for the time strictly necessary for the purposes pursued.

Follow-up to the report	Retention period
When the preliminary assessment concludes that the report does not fall within the scope of the system, or that it is not of a serious nature.	Unless the report has been made in bad faith, the personal data concerning the report is immediately destroyed.
When the report is deemed admissible, but no further action is taken.	The personal data of such report will be deleted or anonymised, within a maximum period of two months from all admissibility or verification operations.
When the report is deemed admissible and action is taken.	The data collected will be stored or archived for the duration of the statute of limitations (10 years for crimes, 6 years for offences and 1 year for other violations of the law) and, in the event of litigation, until the expiry of the time limits for litigation (including the time limit for appeal) in a separate information system with restricted access. Such data will be destroyed or anonymised afterwards.

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 Whistleblowing System you may contact the data protection officer at the following address: dpo@roullier.com

In any event, any data subject may refer any claim or complaint concerning the Processing of their Personal Data to the CNIL (French Data Protection Authority).