

PLG

PRIVACY STATEMENT CONTROLLER
WHISTLEBLOWER NOTIFICATION MANAGEMENT



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1. Introduction

Welcome to **ProductLife Group** (hereafter also referred to as 'we', 'us' or 'Controller'). ProductLife Group is the controller of the processing of your personal data as described in this statement. We are committed to the protection of your personal data and are committed to ensuring your privacy. In this privacy statement we explain what personal data we collect, why we collect it, how we use it and what rights you have in relation to your personal data.

It is essential that you read this statement carefully to understand how we process and protect your personal data. This privacy statement applies to the processings of personal data as referred to in Annex I and offered by us.

We reserve the right to change this privacy notice from time to time. Any changes will be published on this page and, where appropriate, we will notify you via email or other communication channels. We encourage you to consult this statement regularly so that you are aware of the most recent version.

If you have any questions about this privacy statement or how we process your personal data, please contact us using the contact details below.

2. Purposes of data processing

At ProductLife Group, we process your personal data for various purposes. In Annex I an overview of the purposes for which we process your data is provided.

3. Legal bases for processing

According to the General Data Protection Regulation (GDPR), we may only process your personal data if there is a valid legal basis for doing so. At ProductLife Group, we base the processing of your personal data on one or more of the following legal bases:

- Explicit consent
- Performance of a contract
- Legal obligation
- legitimate interest



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4. Categories of personal data

At ProductLife Group, we process different categories of personal data depending on the services and activities we offer to our Clients. In Annex I the categories of personal data we may collect and process are provided per processing.

5. Processors of personal data

At ProductLife Group we use processors for the processing of your personal data. In Annex I the processors of personal data we use are provided per processing.

6. Recipients of personal data

At ProductLife Group, we share your personal data with third parties only when necessary for the provision of our services and products, or when we are required to do so by law. In Annex I the recipients of personal data we may collect and process are provided per processing.

7. Data transfer outside the EEA

At ProductLife Group, we may transfer your personal data to countries outside the European Economic Area (EEA). When we transfer personal data outside the EEA, we ensure that these data transfers comply with applicable laws and regulations to ensure an adequate level of protection for your personal data. In Annex I the safeguards of transfers of personal data outside of the EEA are provided per processing.

8. Retention periods

At ProductLife Group, we will retain your personal data for not longer than is necessary for the purposes for which it was collected, as described in this privacy statement. In Annex I the retention periods for your personal data are provided per processing.

9. Rights of data subjects

According to the General Data Protection Regulation (GDPR), data subjects have certain rights in relation to their personal data. At ProductLife Group, we respect these rights and ensure that you can exercise your rights. Below is an overview of your rights:

- **Right to access**

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You have the right to request confirmation from us on whether your personal data is being processed. If so, you can access your data and receive information about the purposes of processing, the categories of data, recipients of the data, and the data retention period.

- **Right to rectification**

You can request the correction of inaccurate personal data. If your data is incomplete, you have the right to have it completed.

- **Right to erasure (Right to be forgotten)**

You can request the deletion of your personal data if it is no longer necessary for the purposes for which it was collected, if you withdraw your consent, if you object to the processing and there are no overriding legitimate grounds, if the data was unlawfully processed, or if the data must be erased to comply with a legal obligation.

- **Right to restriction of processing**

You can request the restriction of processing if you contest the accuracy of your data, if the processing is unlawful and you oppose deletion, if we no longer need the data but you need it for legal claims, or if you have objected to processing and verification of our legitimate grounds is pending.

- **Right to data portability**

You have the right to receive your personal data in a structured, commonly used, and machine-readable format, and to transmit that data to another controller, where the processing is based on consent or contract and is carried out by automated means.

- **Right to object**

You can object to the processing of your personal data for direct marketing purposes at any time. You can also object to processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority, unless we demonstrate compelling legitimate grounds for the processing.

- **Right to withdraw consent**

If processing is based on consent, you can withdraw your consent at any time. Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

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- **Right to lodge a complaint**

You have the right to lodge a complaint with a supervisory authority if you believe that our processing of your personal data infringes the GDPR.

- **Automated decision-making, including profiling**

You have the right not to be subject to decisions based solely on automated processing, including profiling, which have legal effects or similarly significant effects on you, unless it is necessary for a contract, authorized by law, or based on your explicit consent. You also have the right to express your point of view and contest such decisions.

10. Security measures

At ProductLife Group, we take the protection of your personal data very seriously. We have implemented appropriate technical and organisational measures to secure your personal data against loss, misuse, unauthorised access, disclosure, alteration and destruction. Below is a summary of the main security measures we have implemented:

1. **Access control:** Only authorized employees can access personal data, and we use strong passwords and two-factor authentication to keep others out.
2. **Encryption:** We encrypt data so that it stays private when it's being sent or stored.
3. **Security software:** We use the latest anti-virus, anti-malware, firewalls, and intrusion detection software to protect our systems from cyber attacks.
4. **Regular security audits:** We regularly check our security measures to ensure they work well and make improvements if needed.
5. **Data minimization:** We only collect the personal data we need and don't keep it longer than necessary.
6. **Training and awareness:** Our staff receive regular training on data protection and security to stay updated on best practices and legal requirements.
7. **Secure networks:** We use secure networks to protect data sent via our websites and applications from being intercepted or altered.
8. **Incident response:** We have procedures to handle security incidents and data breaches. If a breach occurs, we will take steps to reduce the impact and inform the necessary authorities and affected individuals if needed.

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11. No cookies or tracking

No information that was not explicitly provided by you is stored. No cookies or tracking of any sort is used on the reporting page meaning that the system does not store the IP-address or Machine ID of the device used to report. For security purposes your IP-address is temporarily processed in a hashed version in RAM to prevent malicious activity and spam reports.

12. Changes to the privacy statement

At ProductLife Group, we may need to amend this privacy statement from time to time to ensure that it remains up-to-date in relation to our processing activities, to comply with changing laws and regulations, or based on feedback from stakeholders. Below is information on how we handle changes to this privacy statement:

Any significant changes to this privacy statement shall be published on our website (<https://www.productlifegroup.com/privacy-policy/>).

We encourage you to check our website regularly to be aware of any changes. By continuing to provide us your personal data after the publication of the amended privacy statement, you implicitly acknowledge that you have been made aware of these changes.

13. Contact information to exercise your rights

At ProductLife Group, we value your questions and comments regarding our privacy practices and your rights as a data subject. We aim to respond within one month of receiving your request or complaint. Should we fail to respond within this timeframe, we will inform you of the reason for the delay and the expected date of our response.

Below are the contact details of our DPO. The latter you can use to exercise your rights or file a complaint:

Name DPO	: Yannick Dossa
Telephone number	: +33 4 72 91 27 50
E-mail	: dpo@productlife-group.com

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13. Filing complaints or seek judicial remedy

If you have a complaint about the way we process your personal data, you can contact us using the contact details above. In addition, you have the right to lodge a complaint with the supervisory authority or seek judicial remedy at the appropriate court in your country:

Supervisory authority: Commission Nationale de l'Informatique et des Libertés

Website supervisor: <https://www.cnil.fr>

Annex I : Processing activities

Processing activity	Notification management
#1 Purpose of processing	Whistleblower notification management
Purpose description	During the period starting with the creation of a whistleblower notification and ending with the closure of a whistleblower notification, the following personal data will be processed and saved in the following filing system(s) for the purpose of the collection, registration, assessment and storage of notifications, implementation and evaluation of appropriate measures, and compliance with the accountability requirements ex Article 23 of the Whistleblower Directive and, if necessary, subsequent storage in compliance with the following retention period.
Personal data categories, Data subject categories	<ul style="list-style-type: none"> Given the nature of the alert system, any type of data, including sensitive data may be collected from any person within or outside PLG.
	<ul style="list-style-type: none">
Location collection	<ul style="list-style-type: none"> Formalize Whistleblower app
Legal basis for processing	<ul style="list-style-type: none"> Consent ex art. 6.1(a) GDPR Legal obligation ex art. 6.1(c) GDPR, French Law

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	Sapin II (articles 6 et 17.II.2°)
Retention period	In compliance with Article 18 of the directive reports are archived in a manner that respects confidentiality requirements and are not be kept longer than necessary and proportionate to comply with the directive or other requirements imposed by EU or national law.
Filing systems	<ul style="list-style-type: none">• Formalize Whistleblower app
Processors	<ul style="list-style-type: none">• Formalize SA - Denmark
Joint controller	<ul style="list-style-type: none">• NA
Recipients of personal data	<ul style="list-style-type: none">• Public authorities (Only if legally required)
Data transfer outside EEA	<ul style="list-style-type: none">• NA
Legal basis data transfer outside EEA	<ul style="list-style-type: none">• NA