



DATA PRIVACY INFORMATION NOTICE

relating to the Whistleblowing System

1. Context

This document aims at explaining how personal data is communicated or collected when making and processing a report, in compliance with the Whistleblowing procedure.

The system is implemented in compliance with the requirements from the General Data Protection Regulation (reference EU2016/679) of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of Personal Data and on the free movement of such data (hereinafter referred as “**GDPR**”).

2. Personal Data processed

When an Employee or an Occasional and External Staff raises an alert, they may communicate to ArianeGroup personal data about them, as well as, personal data about person(s) targeted or about person(s) able to provide information necessary for processing the Alert.

Moreover, ArianeGroup may collect and handle personal data concerning other person(s) during the handling of the report.

Personal data that can be collected and processed include in particular:

- the identity, function and contact details of the reporter,
- the identity, function and contact information on the person(s) implicated by the report;
- any other information voluntarily communicated by the reporter, or
- resulting from the processing of the alert.

When handling an Alert, ArianeGroup may also collect personal data concerning person(s) who may provide information necessary for the handling of the Alert (these persons may have been identified by the reporter or not).

3. Purposes

Personal data is collected and processed for the purposes of assessing the admissibility of the Alert, of checking facts and taking appropriate measures, if necessary.

It enables ArianeGroup to comply with its legal obligations and to protect its legitimate interest:

- Implementation of the requirements from the articles 8.III and 17 of the 'Sapin 2' law (Act No. 2016-1691, of 9 December 2016, relating to Transparency, Anti-Corruption and Economic Modernisation)
- Implementation of the requirements from the 'Duty of Vigilance' law (Act No. 2017-399, of 27 March 2017, relating to the duty of vigilance of parent companies and contracting companies)
- Respect of ArianeGroup Integrity commitments as described in its Ethics Charter, and the resulting directives and procedures.

The system is also embedding the principles laid down in the 2019 Whistleblower Protection Directive (Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law).

4. Data Controllers

ArianeGroup SAS is the data controller of the personal data collected and processed.

When handling an Alert, personal data may be collected or processed by, or transferred to other entities of the group, for example, the entity employing the reporter. In that case, such company shall be considered as Data Controller as well.

All ArianeGroup entities shall process personal data for the purposes outlined in the present notice. For further information about other entities' use of personal data in relation to the Procedure, please refer to the applicable entity's privacy policy or statement, and any applicable whistleblowing procedure.

To obtain more information on how personal data is collected and processed, data subjects can send a request to the Data Protection Officer of ArianeGroup SAS (dpof-France@ariane.group).

5. Retention

Subject to document retention requirements of local legislation, the elements of the report (as described in the section 2 - Personal Data processed) are deleted within a maximum delay of 2 months from the non-admissibility decision (except if the report results in a disciplinary or judicial proceedings).

If the report is considered admissible, the elements of the Alert (as described in the section 2 - Personal Data processed) will be deleted or archived within a maximum delay of 2 months after the handling of the Alert is concluded. If the Alert handling has resulted in disciplinary or legal proceedings, the elements will be kept for the duration of the proceeding and in line with any local document retention requirements.

6. Data Recipient

Persons who may have access to the personal data provided or collected are the GEGO, the authorised contributors and more generally all those persons who may participate to the data processing as part of (i) the collection or/and the processing of the report or (ii) to take appropriate measures, in accordance with the Procedure. These might include persons within ArianeGroup or its subsidiaries.

The external provider in charge of the web platform is also a recipient.

All these persons are subject to a strict confidentiality obligation.

7. Right to Object

Data subjects have the right to object, on grounds relating to their particular situation, at any time to processing of their personal data.

Please note that it can be more difficult, and in some cases impossible, to handle an alert if a reporter exercises their right to object.

Moreover, this right to object cannot be used to prevent ArianeGroup from fulfilling its legal obligation to handle Alerts and protect reporters.

8. Other Rights

Data subjects also have the following rights:

- the right to access in their personal data, which means to obtain from the data controller confirmation as to whether or not personal data concerning them is being processed, and, where that is the case, access to the personal data with some specific information on its processing (in compliance with the applicable legislation);
- the right to rectify inaccurate or incomplete personal data ;
- the right to ask for personal data to be deleted, also called « right to be forgotten », which allow data subject to obtain the deletion of their personal data in certain conditions (ex: personal data is no longer necessary for the processing of follow up of an Alert) , subject to potential legal obligations of retention;
- the right to restrict the processing of the personal data (including, in some cases, to obtain the suspension of the processing);
- the right to object to the processing of their personal data for reasons relating to their particular situation. However when the reporter refuses the collection or processing of their personal data, it can make difficult or even impossible to handle an Alert. Furthermore, this right to object cannot be used to prevent the Company to fulfil its legal obligations concerning the processing of the Alert and the protection of the Whistleblower;
- the right to give instructions about the preservation, the deletion and the communication of their personal data after their death ;

These rights can be exercised by sending a request as described in section 4 - Data controllers.

9. RIGHT TO LODGE A COMPLAINT

Data subjects have the right to lodge a complaint with the relevant supervisory authority, in particular in the European Union member state of their habitual residence, workplace, or where the alleged breach of the applicable regulations occurred.