



## **GDPR Ethics Alerts - GDPR disclaimer (update 02/10/2026)**

In accordance with the regulations in force on the protection of personal data, specifically Regulation (EU) 2016/679 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, as well as the revised Data Protection Act (LIL) of 2018-493 of 20 June 2018 amending Law No. 78-17 of 6 January 1978, you will find below the data protection policy.

Groupe Limagrain Holding and Vilmorin & Cie, as joint data controllers, inform you of the following processing of personal data: the implementation of an internal whistleblowing system, the collection and examination of reports made.

The affiliates of Groupe Limagrain Holding and Vilmorin & Cie are subcontractors. The purpose of the processing is to combat corruption and influence peddling.

The purpose of this processing is to:

- collect and process alerts to report a breach of a specific rule,
- carry out the necessary checks, investigations and analyses,
- define the follow-up to be given to the report,
- ensure the protection of the persons concerned,
- exercising or defending legal claims.

The legal bases used are as follows:

- the legal obligation (LAW No. 2016-1691 of 9 December 2016 on transparency, the fight against corruption and the modernisation of economic life, known as the "Sapin II Law"),
- the legitimate interest for the persons mentioned or called to testify.

The personal data collected are as follows:

- Connection data, contact details, subject, date and number of the report, history of exchanges, quality feedback on the service offered, statistics;
- Identity, functions and contact details:
  - The whistleblower,
  - Of the people mentioned in the alert,
  - The persons involved, consulted or heard in the context of the processing of the alert,
  - Facilitators and people in contact with the whistleblower;
- Possibly, depending on the elements transmitted in the alerts: personal life, professional life, economic and financial information, data relating to digital life, sensitive data within the meaning of Articles 9 and 10 of the GDPR.

This personal data is only used for the purpose specified above. Therefore, only relevant and necessary information will be collected. Groupe Limagrain Holding and Vilmorin & Cie take

various measures to ensure the security of your data against loss, misuse, unauthorized access, disclosure, modification or destruction.

The recipients of this data are:

- internally: the members of the competent Whistleblowing Management Committee and the Group's Compliance Officer(s) from the Legal and Compliance Department;
- externally: SGG (software publisher), Lunalogic (software integrator) and, where applicable, the service providers mandated for the surveys.

This data may only be transmitted to authorised persons (employees and service providers) for integration and maintenance and will be kept for 5 years from the date of closure of the reporting file. This period may also be extended to the retention period of another file relating to the same subject and which requires the retention of previous exchanges.

The data will be deleted manually as soon as the processing ends.

The data is hosted by Microsoft Azure in France. The hosting provider is ISO 27001 "Information Systems Security" and ISO 27018 "Information Security, Cybersecurity and Privacy Protection" certified.

For your information, due to the international scope of the Limagrain Group, the personal data indicated above may be shared in the countries where the companies belonging to it are located, namely:

Algeria, Argentina, Australia, Belgium, Brazil, Bulgaria, Cambodia, Canada, Chile, China, Czech Republic, Denmark, France, Germany, Ghana, Greece, Guatemala, Hungary, India, Israel, Italy, Japan, Jordan, Kazakhstan, Kenya, Mexico, Moldova, Morocco, Myanmar, Netherlands, Peru, Poland, Romania, Russia, Serbia, Slovakia, South Africa, Spain, Thailand, Turkey, Ukraine, United Kingdom, United States, Vietnam.

(List drawn up on the date of validation and subject to change according to the Group's activity.)

The whistleblower has various rights: right of access, right of rectification, right of erasure, right to restriction of processing. These rights may be limited in accordance with the regulations.

To exercise these rights or for any questions relating to the processing of data from this device, contact the DPO:

- by email to: [gdpr@limagrain.com](mailto:gdpr@limagrain.com)

- by post to: Limagrain Group

Data Protection Officer  
CS 20001  
63360 GERZAT

If, after making contact, the whistleblower considers that his or her rights are not being respected, he or she may submit a complaint:

- online at:

- CNIL (<https://www.cnil.fr/fr/plaintes>) or
  - a local competent authority or
- by post to the Commission nationale de l'informatique et des libertés - Complaints Service - 3 Place de Fontenoy - TSA80715 - 75334 PARIS CEDEX 07.