

## FLORIDIENNE – BIOBEST – WHISTLEBLOWING POLICY

Floridienne – Biobest is committed to conducting its activities in a fair, honest and transparent manner and to complying with its legal and regulatory obligations.

Despite the efforts made to respect this commitment, certain behaviours or situations that are reprehensible or not in accordance with the law cannot be totally excluded.

A culture of openness and accountability is essential in order to prevent such situations from occurring and to address them when they occur.

Through the whistleblowing platform, available at <https://whistleblowersoftware.com/secure/floridiennebiobest>, Floridienne – Biobest would like to encourage you to report certain breaches of the laws.

The legislation in the field provides that, in the event of suspected breaches, the matter should first be referred to the direct supervisor, and by default to give preference initially to the internal channel and not the external channels managed by the authorities. This will ensure that prompt and effective action can be taken to address violations and avoid overwhelming the channels managed by public authorities. Floridienne – Biobest therefore strongly encourages whistleblowers to contact their direct supervisor or make use of the internal channel, and undertakes to a diligent, optimal follow-up and consistent with the relevant legislation.

This policy aims to inform you in particular about the functioning of the platform, how alerts will be processed, the data collected in this context, and the protection you have as a whistleblower under the conditions set by law.

If any part of this policy conflicts with applicable local laws, (e.g. data protection, labor and criminal laws, etc.), such applicable local laws must be followed.

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## 1. Definitions

**Floridienne Group** refers, in this specific whistleblowing policy, to all companies or legal entities controlled by SA Floridienne NV SA (B-1410 Waterloo, Drève Richelle 161 P, box 4, company number 403.064.593), except for the companies falling under Biobest Group, as defined hereunder. The term control must be understood as defined in Article 1:14 of the Companies and Associations Code.

**Biobest Group** (2260 Westerlo, Ilse Velden 18), refers, in this specific whistleblowing policy, to all companies or legal entities controlled by Biobest Group NV (2260 Westerlo, Ilse Velden 18, company number 893.948.337). The term control must be understood as defined in Article 1:14 of the Companies and Associations Code.

Floridienne Group and Biobest Group are hereafter referred to, together, as "**Floridienne – Biobest**" and, individually, as "**Floridienne Group**", "**Biobest Group**" or the "**Group concerned**".

**Employee or Worker:** any natural person bound by an employment contract to a company of Floridienne – Biobest, within the meaning of Article 45 (1) of the Treaty on the Functioning of the European Union.

**Whistleblower:** means any person who reports Information on Breaches (in accordance with point 3) and who falls within the scope of the Whistleblower Law or within the scope of point 2.1, whether or not that person is employed by Floridienne – Biobest.

**Facilitator:** a natural person who assists a Whistleblower during the reporting process and whose assistance should be confidential.

**Third parties:** persons who are neither Whistleblowers nor Facilitators and who are linked to the Whistleblower and who risk being the subject of reprisals in a professional context, such as colleagues or relatives of the Whistleblower.

**Breaches:** means any fact, act or omission which:

- (a) is unlawful and relates to the areas within the material scope or the acts referred to in point 2;
- (b) is contrary to the object or purpose of the rules laid down in the areas within the material scope or the rules laid down in the acts referred to in point 2.2.

**Information on Breaches:** information, including reasonable suspicions, about actual or potential Breaches, that have occurred or are very likely to occur as well as about attempts to conceal such Breaches.

**Whistleblower Law:**

- For entities located in Belgium, this term refers to the Belgian law of 28 November 2022 on the protection of persons who report breaches of EU or national law found within a private entity in the legal sector, partially transposing European Directive 2019/1937;
- For all entities not located in Belgium, this term refers to the local legislation applicable to whistleblowers.

**Whistleblower Directive:** EU Directive 2019/1937 of 23 October 2019 on the protection of persons who report breaches of Union law.

**Whistleblowing coordinator:** the Whistleblowing coordinator of the Group concerned. The use of the neutral masculine is without prejudice to the possibility that a woman or a man carries out these duties.

**Compliance Committee of Floridienne Group:** committee responsible for the reception and processing of alerts and composed as follows:

- Gaëtan Waucquez (CEO Floridienne Group)
- Thibaut Hofman (CFO Floridienne Group & Whistleblowing coordinator)
- Alain Grandhenry (HR Manager Floridienne Group)

**Compliance Committee of Biobest Group:** committee responsible for the reception and processing of alerts and composed as follows:

- Jean-Marc Vandoorne-Feys (CEO Biobest Group)
- Kristof Truyens (CHRO Biobest Group & Whistleblowing coordinator)
- Els Pauwels (Manager Legal Affairs Biobest Group)

The Compliance Committee of Biobest Group or the Compliance Committee of Floridienne Group are hereafter referred to, each insofar as it is concerned, as the "**Compliance Committee of Biobest Group**", the "**Compliance Committee of Floridienne Group**" or the "**competent Compliance Committee**".

**Fieldfisher:** the English law firm Fieldfisher (Belgium) LLP

## 2. Scope of application

Floridienne – Biobest has set up a whistleblowing and tracking channel which can be used through an online portal provided by the Danish company Whistleblower Software ApS whose registered office is at Kannikegade 4 at 8000 Aarhus C (Denmark) (the "Whistleblowing Channel").

This Whistleblowing Policy defines the conditions under which this Whistleblowing Channel may be used within Floridienne – Biobest.

### 2.1. Scope of application to the personnel

This Whistleblowing Policy applies to individuals who have obtained information about Breaches in a professional context concerning Floridienne – Biobest and in particular:

- employees and those whose employment relationship has ended;
- job applicants;
- paid and unpaid trainees and apprentices;
- independent consultants and service providers;
- temporary workers;
- volunteers;
- supplier's employees;
- shareholders, directors and any other person belonging to the administrative, management or supervisory body of Floridienne – Biobest, including non-executive members, whether paid or not.

The Whistleblowing Channel set up by Floridienne – Biobest is accessible for any alert containing Information on Breaches that the aforementioned persons have obtained in a professional context.

### 2.2. Scope of application to the equipment

The Whistleblowing Channel may be used to report any Information on Breaches that fall within the scope of the Whistleblower Law or the Whistleblower Directive.

**For Belgian entities, Information on Breaches must relate to the following areas, in accordance with the applicable Whistleblower Law:**

(i) any Breach of law in the following areas:

- public procurement;
- financial services, products and markets and prevention of money laundering and terrorist financing;
- product safety and compliance;
- transport security;
- environmental protection;
- radiation protection and nuclear safety;
- food and feed safety, animal health and welfare;
- public Health
- the protection of consumers;
- the protection of privacy and personal data, and the security of network and information systems;
- the fight against tax evasion;
- the fight against social fraud;

(ii) any Breach affecting the financial interests of the European Union, as referred to in Article 325 of the Treaty on the Functioning of the European Union and as specified in the relevant implementing provisions of community or national law;

(iii) any Breach relating to the internal market of the European Union as an area without internal borders in which the goods, persons, services and capital move freely, including breaches of the competition and State aid rules of the European Union.

**For all companies or legal entities controlled by Floridienne – Biobest but not located in Belgium, the material scope of application may be different, based on the local applicable whistleblowing law.**

Information on Breaches that do not fall within any of the areas of application mentioned above, and within the material scope of violation provide by the applicable Whistleblower Law cannot be subject to whistleblowing via the internal channel described in this policy.

Thus, whistleblowing concerning possible breaches of the legislation on psychosocial well-being within Floridienne – Biobest (violence, moral or sexual harassment and psychosocial aspects at work) or any other issue, which is specifically regulated in a specific country and referred to in the internal regulations or any other policy, should be conducted using the specifically designated channels and applicable procedures.

For some areas not falling under this scope of application, other reporting channels exist (see point 6 "External Whistleblowing").

## 3. Whistleblowing

### 3.1. Whistleblowing internal channel

The Whistleblowing Channel provides a single, direct means available to all Whistleblowers for the collection and processing of internal alerts containing Information on Breaches in accordance with point 2.

This portal is accessible by clicking on this link:

<https://whistleblowersoftware.com/secure/floridiennebiobest>

In the event of a technical problem related to the platform, Whistleblowers are invited to contact the Whistleblowing coordinator of the Group concerned via the email address [whistleblowing@biobestgroup.com](mailto:whistleblowing@biobestgroup.com) or [whistleblowing@floridienne.be](mailto:whistleblowing@floridienne.be).

Internal alerts can be sent through the Whistleblowing Channel in writing.

Reporting can also be made by personally meeting the Whistleblowing coordinator of the Group concerned or any other member of the competent Compliance Committee at the express request of the Whistleblower sent via the online portal or by email to [whistleblowing@biobestgroup.com](mailto:whistleblowing@biobestgroup.com) or [whistleblowing@floridienne.be](mailto:whistleblowing@floridienne.be), depending of the Group concerned. This meeting (in person or by video conference) shall be held within a reasonable time after the request.

If the report is made during a video conference or a physical meeting, the conversation is recorded with the Whistleblower's consent or, failing that, an accurate written account of the conversation is written. The Whistleblower verifies the contents of the written report, rectifies it as necessary, and signs it.

Access to information transmitted via the Whistleblowing Channel is strictly limited to:

- For alerts handled by the Floridienne Group :
  - the members of the Compliance Committee;
  - see point 3.3. (i);
  - members of Whistleblowing Software, who may be exposed to it as part of their mission to maintain the computer platform and protect the data stored therein,
  - members of Fieldfisher.
  
- For alerts handled by the Biobest Group :
  - the members of the Compliance Committee;
  - see point 3.3. (i);
  - members of Whistleblowing Software, who may be exposed to it as part of their mission to maintain the computer platform and protect the data stored therein,
  - members of Fieldfisher.

## 3.2. Privacy and anonymity

A Whistleblower may decide to report anonymously or to communicate his/her personal details, which will be treated with the utmost confidentiality.

If a Whistleblower decides to reveal his or her identity when making a whistleblowing that falls within the scope of the Whistleblower Law, the persons referred to in point 3.1 with access to the identity information contained in the report shall maintain the confidentiality of the Whistleblower's identity in accordance with the Law in force.

Thus, the identity of the Whistleblower will, in principle, only be disclosed if the Whistleblower expressly and freely consents to it.

However, the identity of the Whistleblower may be disclosed to public authorities, such as the police or the public prosecutor's office, where this is a necessary and proportionate obligation under special legislation in the context of investigations conducted by national authorities or in the context of judicial proceedings, in particular with a view to safeguarding the rights of the defence of the person concerned.

In this case, the Whistleblower will be informed before such disclosure is made, unless such information endangers ongoing investigations or court proceedings. The Whistleblowing coordinator of the Group concerned or another member of the competent Compliance Committee will send the Whistleblower a written explanation of the reasons for disclosing his/her confidential data.

If the Whistleblower decides to report anonymously but the Whistleblower provides data that allows Floridienne – Biobest to identify him/her, Floridienne – Biobest will be entitled to process this data.

If a Whistleblower makes an anonymous report, he/she will have the option to request to be informed of the investigation through a secure and anonymous link through which Floridienne – Biobest can contact him/her.

The Whistleblowing Channel allows the Whistleblower to delete the record of the IP address or his/her identifiers and does not use cookies. If the Whistleblower's computer belongs to Floridienne – Biobest or is connected to Floridienne – Biobest's network, there is a risk that the IP address and/or identifiers of the Whistleblower's computer will be recorded in Floridienne – Biobest's server history through the back-up that is maintained in Floridienne – Biobest's computer systems. The Whistleblower can prevent this risk by reporting from a computer that does not belong to Floridienne – Biobest or is not connected to Floridienne – Biobest's network.

It is recommended that reports be made on a non-anonymous basis, as anonymity may make it difficult to conduct an appropriate investigation and adopt adequate protection measures.

### 3.3. Handling alerts

#### i. Roles and responsibilities

**Whistleblowing coordinator:** The Whistleblowing coordinator of the Group concerned, assisted by the competent Compliance Committee, is the designated single point of contact within the Group concerned to handle the alerts made. He/she shall be assisted by a team of Fieldfisher lawyers.

The Whistleblower may indicate in his/her alert whether the Whistleblowing coordinator of the Group concerned or another member of the competent Compliance Committee is personally involved in the reported Breach. In this case, the alert will not be sent to this member and the identity of the Whistleblower, of any Facilitator or Third Party will not be disclosed to such member.

**Fieldfisher** will act as advisor and in Floridienne – Biobest's sole interest in accordance with the contract between Fieldfisher and Floridienne – Biobest, and in compliance with the ethical rules applicable to its members. It is understood that all information and/or documents transmitted by the Whistleblower may be used by Fieldfisher in order to protect the interests of Floridienne – Biobest as if such information and documents were directly transmitted by Floridienne – Biobest.

Designated members of Fieldfisher shall be responsible for receiving and forwarding to the Whistleblowing coordinator of the Group concerned and the competent Compliance Committee all reports and requests made through the Whistleblowing Channel.

If the Whistleblower indicates in his/her alert that all the members of the competent Compliance Committee are involved in the reported Breach and that they should therefore not be aware of the alert or the identity of the Whistleblower, Fieldfisher will in this case transmit the content of the alert, including the identity of the Whistleblower, if applicable, to the President of the board of Floridienne SA.

The processing of the alerts will in principle be carried out within 3 months of the sending of the acknowledgement of receipt.

Within the same period of 3 months, feedback will be sent to the Whistleblower who will be informed of the actions envisaged or undertaken following his/her alert as well as the reasons for these actions.

#### ii. Initial assessment of alerts

The Whistleblowing coordinator of the Group concerned or any other member of the competent Compliance Committee, assisted by Fieldfisher, will conduct an initial confidential assessment of each alert, to determine whether it falls within the scope of the Whistleblower Law before a full investigation is undertaken.

If the initial assessment shows that the alert does not fall within the scope of the Whistleblower Law, the alert will no longer be processed, and the Whistleblower will be informed in this respect.

Anonymous alerts will be processed if factual information appears that is sufficiently detailed that the reported Breach is plausible.

### iii. Investigation following an alert

Once the initial assessment is completed, the Whistleblowing coordinator of the Group concerned, or any other member of the competent Compliance Committee will investigate the facts indicated in the alert. He/she may call upon any member of the Floridienne – Biobest's management team or any third party, as the case may be, without the information relating to the identity of the Whistleblower, any Facilitators or Third Parties being disclosed to persons other than those authorised on the basis of point 3.1.

The Whistleblowing Channel aims to ensure that the actions taken by anyone responsible for collecting and/or handling an alert remain confidential and that the rights of everyone are respected. Indeed, all persons authorised to read alerts on the basis of point 3.1 undertake to respect their duty of confidentiality, not to use the data and information for purposes other than those of processing alerts, not to keep them beyond the retention period and to destroy or return them as provided in this Policy.

### 3.4. Information to persons involved in an alert

Any person directly or indirectly involved in an alert deemed to justify further investigation will be informed by the Whistleblowing coordinator as soon as possible, in compliance with the applicable legal provisions and Floridienne – Biobest's personal data protection.

However, if after the initial assessment, the Whistleblowing coordinator of the Group concerned or any member of the competent Compliance Committee decides to close the procedure due to lack of evidence or other reasons, or in case of repetitive alerts that do not contain significant new information, they may decide not to inform the persons involved in the alert.

If there is a serious risk that the notification of the alert will jeopardize the investigation of the reported Breach or the possibility of obtaining the necessary evidence, it is possible to postpone or not to send the notification until such time as this risk no longer exists.

If the alert made contains data on identifiable persons other than the subject of the reported Breach, these persons will be informed as described above. This information shall not contain identifiable data about other data subjects or the Whistleblower.

## 4. Protection of Whistleblowers

Alerts are not valid when the Whistleblower receives direct financial compensation as a result of the alert, without prejudice to the prospect of a certain possible reward.

Alerts must be made in good faith. In particular, the Whistleblowing Channel may not be used to report facts that the Whistleblower knows to be false.

Whistleblowers will be protected from any form of retaliation, such as sanctions and discrimination, if they have used the Whistleblowing Channel in good faith, regardless of whether the subsequent investigation reveals a violation and/or breach, or whether the facts reported prove to be inaccurate or incorrect, or whether the information was disseminated in bad faith by someone other than the Whistleblower, who then reported it in good faith.

The same protection is guaranteed to both the Whistleblower and the Facilitator, as well as to Third Parties linked to the Whistleblower and who may be subject to retaliation in a professional context, including members of the Whistleblower's family.

If the persons who have used the Whistleblowing Channel in good faith believe that they have been subject to retaliation, sanctions or discrimination, they must immediately inform the Whistleblowing coordinator of the Group concerned or any manager or line manager they deem more appropriate.

## 5. Secure storage of data

Access to data relating to alerts and surveys carried out will be limited. If the data is stored in a Floridienne – Biobest's information system or in an external system, it will be protected by an individual username and password, which will be changed regularly. Access will be recorded and controlled.

If the data is processed outside such a system, all copies, both digital (USB sticks, etc.) and on paper, will be kept under lock and key. The secure storage system, where whistleblowing data are stored, will ensure that no one, except those authorised to collect and process reports, will have access to such data.

## 6. External whistleblowing

### 6.1. Entities located in Belgium

The Whistleblower can also raise concerns through an external whistleblowing channel set up by an external authority.

The reporting of a problem through an external channel is not conditioned by a prior reporting through the whistleblowing channel set up by Floridienne – Biobest.

However, it is recommended that you first send your reports through Floridienne – Biobest's Whistleblowing Channel so that Floridienne – Biobest is able to quickly and immediately follow up on reported Breaches.

External whistleblowing is possible to the Federal Ombudsmen referred to in the Belgian law of 22 March 1995 establishing Federal Ombudsmen who are responsible for coordinating external whistleblowing in the private sector <https://www.mediateurfederal.be> or any other person designated pursuant to Article 14 of the aforementioned law of 28 November 2022.

### 6.2. Entities located outside Belgium

For entities located outside Belgium, other external reporting channels set up by local authorities should be used according to local applicable legislation

## 7. Publication and operational review of the whistleblowing system.

Floridienne – Biobest is committed to disseminating this Policy in order to provide clear information to potential users. This Policy will be made accessible to all persons within its scope, as determined in point 2.

The whistleblowing procedure and the Whistleblowing Policy will be subject to periodic review, during which relevant action will be taken following recommendations made by the Compliance Committee concerned and alerts that would reveal a significant failure or deficiency in the internal investigation or reporting procedure.

# Floridienne – Biobest

## Privacy notice applicable to whistleblowing ("**Notice**")

Last update: 08/2023

### 1. **About this Notice**

- 1.1 This Notice describes how we (as defined below) collect, share, and use any information that, used alone or in combination with other information, relates to you ("**Personal Data**") when we receive and process alerts.
- 1.2 In this context, we may process Personal Data relating to whistleblowers (whether they are employees, workers, interns, job applicants, supplier's employee, shareholders, etc.), to persons who may be involved in the whistleblowing, to facilitators who assisted the whistleblower, to third parties who are neither whistleblower nor facilitator and who are linked to the Whistleblower and who may be subject to retaliation in a professional context, to potential witnesses and persons interviewed in the context of the verifications, and to persons processing the alerts received ("**you**" and "**your**").
- 1.3 This Notice sets out the rights you have that relate to the Personal Data we process about you, as well as how you can exercise them.
- 1.4 Floridienne – Biobest<sup>1</sup>, as defined in Article 1 of the Whistleblowing Policy, has set up and manages an internal whistleblowing channel. To this end, it acts as data controller of your Personal Data ("**Floridienne – Biobest**", "**we**" and "**our**"). As data controller, Floridienne – Biobest is responsible for ensuring that the processing of Personal Data complies with applicable data protection legislation, and more specifically the General Data Protection Regulation ("**GDPR**"). The data subject may be informed of the specific entity of Floridienne – Biobest which will process the personal data in the context of the management of the internal whistleblowing channel, whether this entity is the sole controller or processes such data jointly with Floridienne – Biobest. In the latter case, the data subject may contact any of the joint controllers, even if for ease of processing it is recommended to contact the designated controller within Floridienne – Biobest by default.
- 1.5 We take our privacy obligations very seriously. For this reason, we have developed this Notice, which applies in conjunction with other applicable opinions, notices or policies.
- 1.6 Please read this Notice carefully. If you have any questions or comments, please contact, by mail to the headquarters of the Group concerned or by email to [privacy@biobestgroup.com](mailto:privacy@biobestgroup.com) or [whistleblowing@floridienne.be](mailto:whistleblowing@floridienne.be), depending on the Group concerned.

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<sup>1</sup> Floridienne – Biobest refers to the following two companies and all companies or legal entities controlled by Floridienne Group and Biobest Group, the term control being the one defined in Article 1:14 of the Companies and Associations Code:

1. **SA Floridienne NV SA**, whose registered office is located at B-1410 Waterloo, Drève Richelle 161 P, box 4 and registered with the Belgian Registry of Companies under company number 403.064.593;

2. **Biobest Group NV**, whose registered office is located at 2260 Westerlo, Ilse Velden 18 and registered with the Belgian Registry of Companies under company number 893.948.337.

## 2. What Personal Data is collected by Floridienne – Biobest and why?

2.1 The categories of Personal Data we collect about you, and the reasons we process it, are as follows:

Why do we collect it?	Categories of Personal Data	Legal basis
Collect, process and verify alerts and reports of breaches  Determining and taking the necessary measures following the whistleblowing	<ul style="list-style-type: none"> <li>- Identity, role and contact details of the whistleblower (unless the whistleblower decides to remain anonymous), of any person involved in the whistleblowing or processing the whistleblowing;</li> <li>- Content of the whistleblowing (including files transmitted) and whistleblowing data;</li> <li>- Information collected when verifying reported behaviours;</li> <li>- Report on the verification process;</li> <li>- Follow-up to the alert.</li> </ul>	<ul style="list-style-type: none"> <li>- Legal obligation in case of requirement to set up an internal whistleblowing channel</li> <li>- In case of voluntary establishment of a legally non-compulsory internal whistleblowing channel: legitimate interest of Floridienne – Biobest to allow the reporting of certain behaviours</li> </ul>

2.2 If we ask you to provide any other Personal Data not described above, then the Personal Data that we ask you to provide, and the reasons for such request, will be clearly indicated to you at the time we collect it.

2.3 The alerts we receive may contain information about ethnicity, political or religious beliefs, physical or mental health or condition, sexual orientation, trade union membership, or the commission (alleged or otherwise) of criminal offences and related security measures (“**Sensitive Personal Data**”). Although we intend to minimise the amount of Sensitive Personal Data we process, we may process such Sensitive Personal Data in certain circumstances if we are permitted to do so by applicable law, including if such Data is necessary for the establishment, exercise or defence of legal claims or to fulfil our obligations and rights under labour law.

## 3. Who do we share your Personal Data with?

3.1 As a general rule, Floridienne – Biobest does not disclose Personal Data collected through the whistleblowing channel to third parties. Only competent members of our staff authorised to have access to alerts will process this Personal Data.

3.2 The identity of the whistleblower, facilitators and other third parties involved, who may be the subject of retaliatory measures, will not be disclosed outside of the personnel competent to receive and process the alerts, unless (1) the whistleblower expressly consents to it, or (2) we must comply with a necessary and proportionate obligation under special legislation in the context of investigations conducted by national authorities or in the context of legal proceedings, in particular with a view to safeguarding the rights of the defence of the data subject.

3.3 However, subject to our strict obligations of confidentiality, specified inter alia in point 3.2, we transmit your Personal Data on a case-by-case basis to the following categories of recipients:

- (a) companies in **our group**, only to the extent necessary to process the alert;
- (b) **our third-party service provider** (Whistleblower Software ApS) which provides us with the technical means for the implementation of the internal whistleblowing channel. We require that such processor act on our instructions and take appropriate steps to ensure that Personal Data remains protected;
- (c) **any law enforcement agency, regulator, government agency, court, prosecutor's office, police, or other third party**, where disclosure is necessary (i) under applicable laws or regulations, (ii) to exercise, establish, or defend our rights, including for any legal proceedings, or (iii) to protect your vital interests or those of any other person;
- (d) **our external auditors and advisors** in connection with the consultancy services they provide to us (e.g. for the purpose of conducting a detailed investigation of reported behaviour). Specifically, Fieldfisher LLP law firm assists us in handling the alerts received.
- (e) any other person if **you have given consent prior to disclosure**.

#### 4. How do we protect your privacy?

4.1 In accordance with this Notice, we will process the Personal Data as follows:

- (a) **Loyalty:** We are transparent about how we process Personal Data and will process it in accordance with applicable law.
- (b) **Purpose limitation:** We will process Personal Data for specified and lawful purposes, and we will not process it in a manner that is incompatible with those purposes.
- (c) **Proportionality:** We will process Personal Data in a manner that is proportionate to the purposes which the processing is intended to achieve. In addition, we encourage whistleblowers to provide only objective, factual Personal Data that is directly related to the subject of the report.
- (d) **Data accuracy:** We take appropriate steps to ensure that the Personal Data we hold is accurate, complete and where necessary kept up to date.
- (e) **Data security** We use appropriate technical and organisational measures to protect the Personal Data that we collect and process about you. The measures we use are designed to provide a level of security appropriate to the risk of processing your Personal Data.
- (f) **International Transfers of Data:** Personal Data in our internal channel is stored within the European Economic Area (EEA) and our service provider is also located within the EEA.
- (g) **Data retention:** We retain the Personal Data that we process when we have a legitimate need in relation to the purpose, to process alerts and to protect the authors and persons and third parties involved. Beyond that period, we will delete or anonymise it, or if this is not possible (for example, your Personal Data have been stored in backup archives), we will store it securely and isolate it from further processing until deletion is possible.

Thus, the name, the function, the contact details of the whistleblower including the business number, and of any person concerned by the protection and support measures, shall be kept until the prescription of the reported facts.

Other personal data relating to alerts that have given rise to verifications, but for which no action has been taken, shall not be kept for more than two months after the end of the verifications, unless disciplinary proceedings or legal or administrative action have been initiated or are planned against the person involved or the person making a report in bad faith. In this case, the data will be kept until the end of the procedure or the prescription of the remedies.

Personal data that is clearly not relevant to the processing of a specific alert will not be collected or, if collected unintentionally, will be immediately deleted.

## 5. Your data protection rights

5.1 You have the following data protection rights, which you can exercise by contacting the Data Protection Officer by mail at the registered office of Floridienne – Biobest or by email to [privacy@biobestgroup.com](mailto:privacy@biobestgroup.com) or [whistleblowing@floridienne.be](mailto:whistleblowing@floridienne.be), depending on the Group concerned:

- (a) You can exercise your **right of access** to obtain confirmation that your Personal Data is being processed by us, to obtain information about the processing methods and/or to obtain a copy of your Data (provided that you do not infringe on the rights and freedoms of others, for example the confidentiality of data relating to the whistleblower). This means that it is not possible to make a request for access to data concerning other people.
- (b) You **can have your Personal Data rectified** if it is inaccurate or incomplete.
- (c) In certain circumstances, you may **request the erasure** of your Personal Data (for example, if the processing is unlawful or if the Data is no longer necessary for the purpose concerned). However, we may keep your Personal Data if it is necessary for the establishment, exercise or defence of our legal rights.
- (d) In certain circumstances, in accordance with applicable data protection legislation, **you may object to the processing** of your Personal Data, or ask us to **restrict the processing** of your Personal Data.
- (e) If you have a complaint or concern about the manner in which we process your Personal Data, we will make every effort to address those concerns. If you believe that we have not adequately addressed your complaint or concern, you have the **right to lodge a complaint with a data protection authority** about our use of your Personal Data. Please contact your local data protection authority for further information. The contact details of the EEA data protection authorities can be found [here](#). Note: local laws must be followed by all means.

5.2 We respond to the above requests without prejudice to our right and obligation to process and respond appropriately to alerts. In addition, we will process requests to exercise data protection rights in accordance with competing rights under whistleblowing legislation. In particular, access to personal data may, where appropriate, be deferred for the duration of an internal investigation into a whistleblowing report in order to protect the rights of the whistleblower.

**6. Updated Notice**

- 6.1 We may update this Notice from time to time in response to evolving legal, technical or business developments. When we update our Notice, we will take appropriate steps to bring it to your attention, in a manner consistent with the significance of the changes we make. We will obtain your consent to any material changes if required by applicable data protection laws.
- 6.2 You can see the date of the last update of this Notice by referring to the date of the "last update" specified at the beginning of this Notice.