

PRIVACY POLICY

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The website legrand.signalement.net (the "Website") is hosted on the servers of OVH, 2 rue Kellermann, 59100 Roubaix, France

IDENTITY OF THE DATA CONTROLLER

The processing of personal data collected is carried out under the responsibility of:

Name and contact details of the Data Controller	Legrand France SA 128, av. du Maréchal de Lattre de Tassigny 87045 Limoges Cedex (France)
Legal information on the Data Controller	Public Limited Company (Société Anonyme) with a registered capital of € 54.912.550 SIRET No. (Business reg.) 758 501 001 00013 APE Code (Business category) 2733Z Registered with the Limoges Trade and Companies Register under the number 758 501 001 VAT ID No. FR 94 758 501 001

DATA COLLECTED AND PURPOSE OF DATA PROCESSING

Data that you communicate to us

	Data collected	Purpose of data processing	Legal basis of data processing
<p>Data related to the issuer of the alert</p> <p>These data are treated confidentially.</p> <p>It is not recommended to use the system anonymously. If, however, you wish to remain anonymous, the seriousness of the facts mentioned will have to be established and the factual elements must be sufficiently detailed to allow the first recipient of the alert to consider the advisability of its release within the framework of the system.</p>	Last name, first name	Easier processing of the alert	Legitimate interest in management and treatment of alerts
	Email address	Notification of receipt of a new message	
	Profession	Easier processing of the alert	
	Phone number	Notification of receipt of a new message for cellphones portables Telephone contact to treat the alert	
<p>Data related to the reported conduct(s)</p>	<p>Reported conduct(s)</p> <p>The contents of the messages and attachments that you send to us may contain personal data relating in particular to persons who are the subject of an alert.</p>	<p>Collection and processing of alerts aimed to reveal a breach of a specific rule</p>	<p>Legal obligation (« Sapin 2 Law », « Law on the duty of care »)</p>

* The facts reported must be strictly limited to the acts directly targeted by the alert system. The data must be formulated objectively to describe the nature of the facts reported and shall indicate the alleged nature of these facts.

The description of the facts could involve the communication of particular categories of data (referred to in Article 9 of the GDPR) or data relating to offenses or convictions (referred to in Article 10 of the GDPR). In these specific cases, the processing of such data would be

authorized by specific provisions of national law or to enable the preparation, execution and follow-up of a legal action where appropriate.

The abusive use of the system may expose its issuer to possible sanctions or prosecution. Conversely, even if the facts prove to be subsequently inaccurate or give rise to no further action, the use of the system in good faith will not expose the issuer to any disciplinary sanction.

Data collected when using our services

	Data collected	Purpose of data processing	Legal basis of data processing
Data related to the reported conduct(s)	<p>Elements collected as part of the verification of the facts reported</p> <p>The description of the facts could involve the communication of particular categories of data (referred to in Article 9 of the GDPR) or data relating to offenses or convictions (referred to in Article 10 of the GDPR). In these specific cases, the processing of such data would be authorized by specific provisions of national law or to enable the preparation, execution and follow-up of a legal action where appropriate.</p>	Collection and processing of alerts aimed to reveal a breach of a specific rule	Legal obligation (« Sapin 2 Law », « Law on the duty of care »)
Data related to persons involved in the collection or processing of the alert	Last names, first names and functions	Collection and processing of alerts aimed to reveal a breach of a specific rule	Legitimate interest in management and treatment of alerts
	Email addresses and phone number	Traceability of recipients Notification of receipt of an alert or a new message	

Data collected during the use of our services

Data collected	Purpose of data processing	Legal basis of data processing
Reports of the verification operations and follow-up given to the report	Collection and processing of alerts aimed to reveal a breach of a specific rule	Legal obligation (« Sapin 2 Law », « Law on the duty of care »)

DATA RETENTION

The data collected by Legrand France and necessary for the processing of the alert will be kept for six years (duration of the limitation periods of the offenses) in intermediate archiving before being destroyed. In the event that the alert would report a felony (bribery on magistrate for example), the retention period in intermediate archiving will be twenty years (duration of the limitation periods of the felonies) before final destruction of data.

EXERCISE OF USERS' RIGHTS

The data subjects (issuer of the alert, persons involved in the collection or processing of the alert, person who is the subject of an alert as a victim or alleged witness of the facts) may exercise their right of access by using the whistleblowing system or by post addressed to the Group Compliance Officer. By exercising this right, these people will not receive any data relating to third-parties.

The treatment is neither based on the contract nor on the consent, the data subjects cannot exercise their right to portability.

In accordance with the provisions of Article 21 of the RGPD, data subjects cannot on principle object to the processing of personal data collected and processed on the basis of the legal obligation. The right to object will only apply to data processed on the basis of the legitimate interest of the data controller, provided that the data subject invokes reasons relating to his particular circumstances and proves that his data does not or not more have to be processed (in case of error for example).

Anyone identified in the Ethics Line has the right to request rectification or erasure of personal data or restriction of processing of personal data under the conditions provided for in Articles 16, 17 and 18 of the RGPD respectively.

You may exercise these rights at any time, subject to the production of valid supporting documents, by sending your request to the Group Compliance Officer:

- by post to: LEGRAND, Direction Juridique Groupe, 82 rue Robespierre – BP 37 93171 Bagnolet Cedex
- using the Site: legrand.signalement.net.

Your request will be processed within one month of receipt. If necessary, this period can be extended by two months, in view of the complexity and the number of requests. In this case, you will be informed of this extension and its reasons within one month of receipt of the request.

No payment will be required for the exercise of your rights except in case of manifestly unfounded or excessive demand. In this case, the Legrand Group further reserves the right to not respond to your request.

In the event you remain dissatisfied with our response, we remind you that you have the right to lodge a complaint with the French data protection authority, *Commission Informatique et Libertés* (CNIL): <https://www.cnil.fr/>.

CONDITIONS OF DATA PROCESSING

The personal data are processed with the help of manual and computer tools.

ACCESS TO DATA

Only the following have access to your personal data, within the limits of their respective assignments:

- The personnel of Legrand France authorized with regard to its attributions (including the Compliance Officer of the Group as main referent);
- The authorized personnel of the relevant Legrand Group company (ies) if the communication of the data is strictly necessary for the purposes of verifying or processing the alert. If such a communication would result in the transfer of personal data relating to a European resident outside the European Union, the said transfer would be authorized by the prior implementation of the standard data protection clauses of the French Data Protection Authority (CNIL);
- The experts specifically responsible for the treatment of a specific case;
- Judicial authorities on court order in proceedings

We inform you that potential recipients of at least one alert are subject to an obligation of confidentiality and may only use your data in accordance with our contractual provisions and applicable law.

We may also be required to share your personal data if it is necessary to safeguard your vital interests or those of another individual, if this is necessary for the fulfillment of a legal obligation to which we are subjected as well as for the finding, exercise or defense of rights in court.

DATA SECURITY

The LEGRAND Group has implemented adequate physical, electronic and administrative protection measures that comply with the regulations in order to protect your personal data.

AMENDMENT TO THE PRIVACY POLICY

This document may be modified at any time without prior notice. We invite you to consult it regularly.

MISCELLANEOUS

The present whistleblowing system is only one means among others to make a report (in the same way as the hierarchical way). Staff members cannot be sanctioned for lack of use.