

INFORMATION RELATIVE A LA GESTION DES SIGNALEMENTS INTERNES

This information applies to the processing of personal data carried out in the context of managing internal reports submitted via the email address: compliance@utac.com or ethics@utac.com

Purpose of the processing :

UTAC HOLDING, with registered office at Autodrome de Linas-Montlhéry, Avenue Georges Boillot, 91310 Linas, to comply with its legal obligations under Article 8 III and 17 of the French Sapin 2 law, processes personal data for the purpose of management the internal reports.

Lawful basis :

The legal obligation (cf. Article 6 paragraph 1 (c) of the General Data Protection Regulation (GDPR)).

Personal data collected :

- Identity, functions and contact details of the author of a report;
- Identity, functions and contact details of the persons concerned by the report;
- Identity, functions and contact details of the facilitators (persons involved in collecting or processing the report);
- Identity, functions and contact details of the persons interviewed in the context of the investigation, if applicable;
- The facts reported;
- Elements collected as part of the verification of the facts reported;
- Audits reports;
- Follow-up given to the report.

Data subjects :

- The whistleblower,
- The persons concerned by the report,
- Possible facilitators,
- The people interviewed as part of the investigation.

Recipients of the personal data :

Within the limits of their respective powers, all or part of the data shall be addressed to:

- Compliance Officer or Ethics Officer
- if need be, Data Protection Manager
- If need be HR Manager
- If need be, the staff representatives' referent in the matter (for example: referent to harassment or psychosocial risks);
- if need be, the manager of the person concerned by the report;

The personal data collected for the purpose of the internal whistleblowing system are not transferred to a third country.

If such transfer of personal data nevertheless proves necessary for the processing of the alert, the Compliance Officer or the Ethics Officer must first obtain the written consent of the data subjects.

Data retention period :

When the report is made to the Compliance Officer or the Ethics Officer :

- Data relating to a report deemed inadmissible by the Compliance Officer or the Ethics Officer is deleted without delay.
- When no action is taken on a report deemed admissible by the Compliance Officer or the Ethics Officer, the data relating to this alert is destroyed within two (2) months of the closing of the verification operations.

In any case :

- When disciplinary or litigation procedures are initiated against a person accused or the author of an abusive report, the data is kept for a period not exceeding the limitation periods for litigation procedures.

Individuals' rights :

You can access the data concerning you, object to the processing of this data, have it rectified or, in particular conditions, have it erased. You also have the right to restrict the processing of your data.

To exercise these rights or for any questions about this processing of your data, you can contact our Data Protection Manager electronically: dpo@utac.com

Finally, you have the right to complain. Complaints may be submitted through any channel. However, individuals are encouraged to use the preferred contact channel by reaching directly our Data Protection Manager via :

Email : dpo@utac.com

Online form : <https://www.utac.com/contact>

so that we can address your request or complaint promptly and effectively.

We will handle your complaint in accordance with our internal data protection complaints procedure and will keep you informed of the progress and outcome.

If you are not satisfied with our response, or if you believe that your personal data has been processed in a manner that does not comply with applicable data protection laws, you have the right to lodge a complaint to the relevant Data Protection Authority (e.g. CNIL, ICO, etc.).