



# SPEAK UP - PRIVACY NOTICE

(version 11/10/2022)

## DATA PROTECTION

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Vandemoortele is committed to ensuring that your privacy is protected. All personal data that we obtain following from a report of Misconduct in accordance with Vandemoortele Whistleblowing Procedure (the "Procedure"), is processed in accordance with applicable data protection legislation, in particular the General Data Protection Regulation 2016/679 of 27 April 2016 ("GDPR"), as well as this Privacy Notice.

This Privacy Notice provides more information about the personal data that we process, why we process it, how we obtain the data, how long we retain the data and with whom we share it.





# PRIVACY NOTICE

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The following legal entities qualify as joint data controllers for the processing of your personal data:

Vandemoortele NV and, in case you are an employee, the entity acting as your employer



If you have ANY QUESTIONS ABOUT THE PROCESSING OF YOUR PERSONAL DATA, you can always contact us via e-mail: [privacy@vandemoortele.com](mailto:privacy@vandemoortele.com)



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Below, you can find more information on THE CATEGORIES OF PERSONAL DATA that we process in the context of the whistleblowing reports and their follow-up, why we process such personal data, how we obtain the data, how long we retain the data and with whom we share it.

In accordance with our Procedure, we may process the facts of the Misconduct, the date of occurrence, the personal identification data of the people involved (both you and the person(s) concerned) and any possible evidence proving the Misconduct.

This data allows us to effectively follow-up on a report of Misconduct in accordance with the Procedure.



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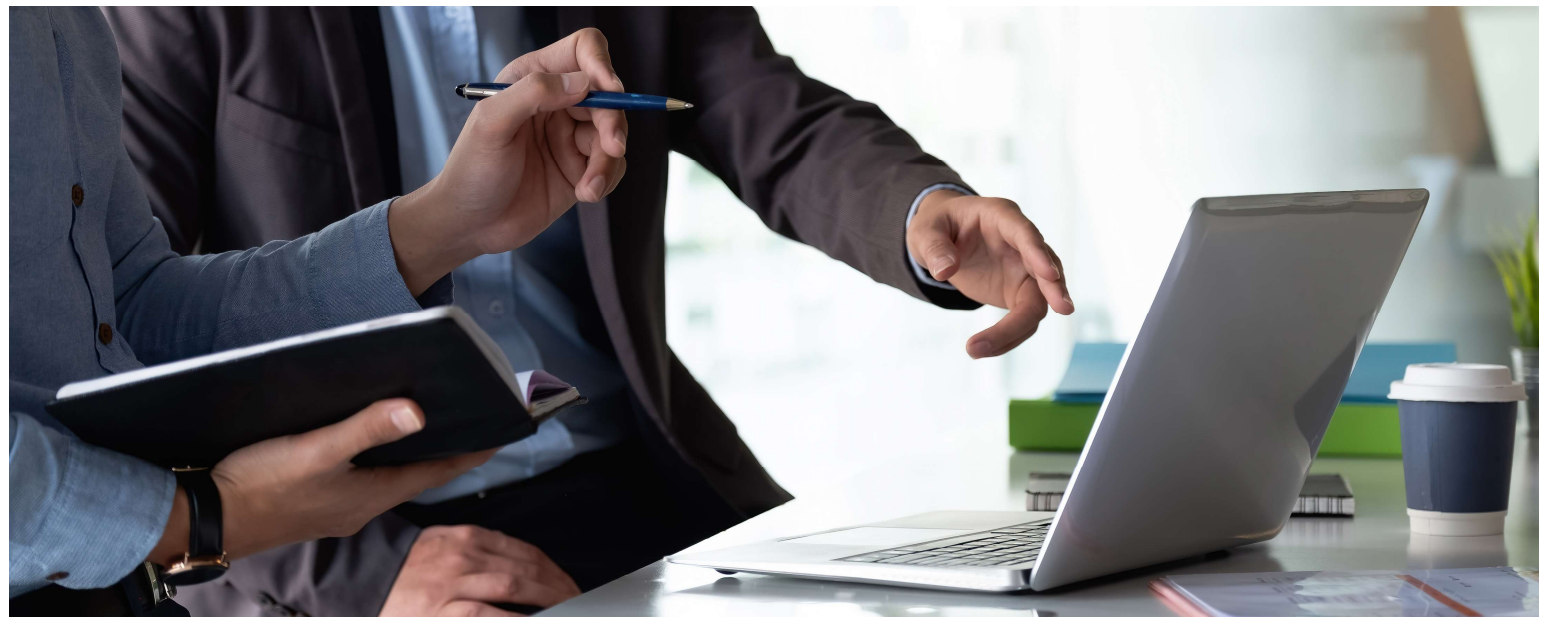
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The legal basis for this processing is our legitimate interest following EU legislation on whistleblowing, to establish an **INTERNAL REPORTING CHANNEL** to report any concern about actual or suspected irregularities and infringements committed, in a confidential and, if desired, anonymous way and whilst remaining protected from retaliation (art. 6, §1, (f) GDPR).

We obtain the personal data from you of the Misconduct. Furthermore, following a report of Misconduct, further information (including personal data) can be obtained from **THIRD PARTIES** during the investigation in accordance with the Procedure.



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We delete any personal data relating to reports that are considered unfounded immediately AFTER COMPLETION OF THE INVESTIGATION. Personal data relating to reports of legitimate concerns will be deleted within a reasonable period of time after the investigation has been completed, but no later than after eight weeks, unless disciplinary action or legal proceedings are taken against the accused or the employee who made a report in bad faith. In this case, the data shall be deleted within a one year period after the disciplinary action or legal proceedings have been concluded and/or the deadline for appeals has expired.

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We only share the above mentioned personal data with **OUR EXTERNAL ADVISERS** such as lawyers and internal employees to the extent necessary to follow up on the report and the issues raised therein. Furthermore, pursuant to a disclosure required by law, we may also share the personal data with a competent national authority or a judicial authority in the context of an investigation. If the latter disclosure is necessary, you will be informed in advance, unless such information would jeopardise the investigation or proceedings.





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We are committed to ensuring that your personal data is secure. We have therefore implemented appropriate technical and organizational measures to ensure the **CONFIDENTIALITY OF YOUR PERSONAL DATA**. Namely, only the authorised recipients of a report have access to the report in the reporting tool. Furthermore, the case handler(s) shall treat the report in a confidential manner and in compliance with the applicable regulations on the protection of personal data. More specifically, the personal data obtained through a report and the subsequent investigation will only be used to investigate the report and, where necessary, to take action in response to the report received.

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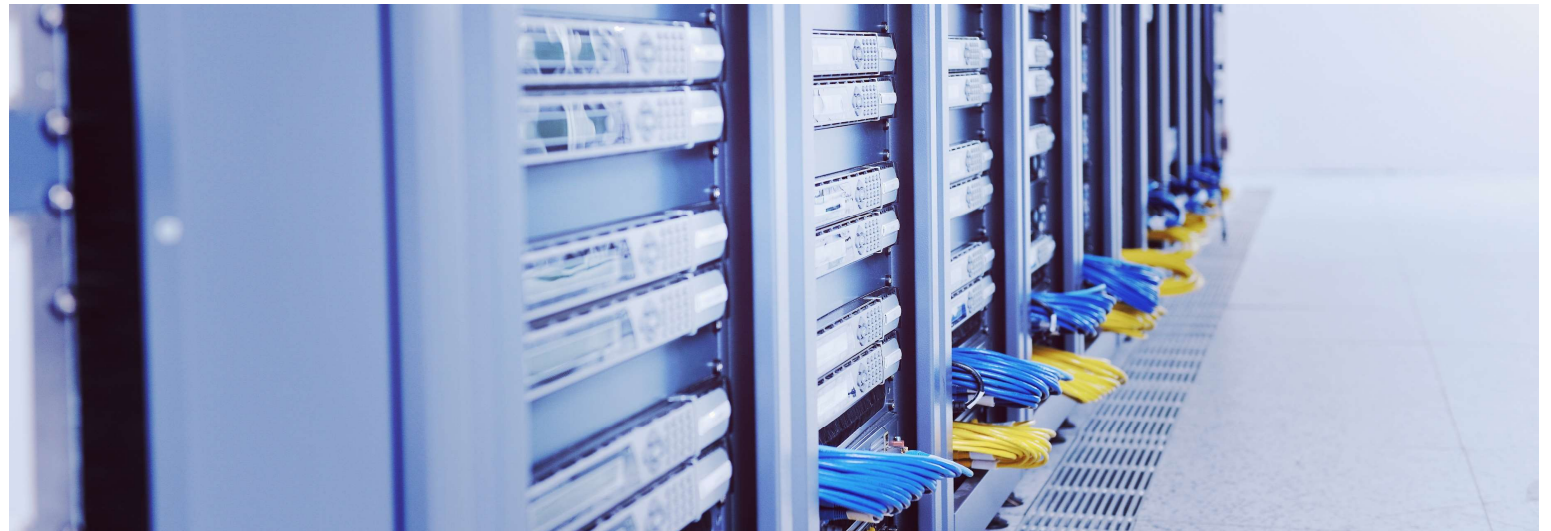
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Furthermore, we have implemented technical and organizational MEASURES TO PROTECT YOUR DATA from accidental and unlawful destruction, loss, alteration, unauthorized disclosure and access.

We have made the necessary contractual arrangements with the third parties with whom we work together and will not transfer your personal data outside the European Economic Area without ensuring that your data is granted an equivalent level of protection there.





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You can always contact us to exercise the following rights:

1

The right to obtain more information about the balancing test that we have carried out in the context of our legitimate interest

4

The right to request restriction of the processing of your personal data

2

The right to request access or rectification of your personal data

5

The right to object to the processing of your data

3

The right to request erasure of your personal data

6

A complaint if you believe that we are not acting in accordance with applicable data protection laws. You can also submit a complaint to the belgian data protection authority.

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It must be noted that this Procedure also serves an important objective of general public interest of the EU and of the Member States. The effective protection of the confidentiality of the identity of reporting persons is necessary for the protection of the rights and freedoms of others. Therefore, where necessary, the exercise of certain data protection rights of persons concerned can be restricted in line with Article 23 [GDPR](#) to the extent that, and as long as, it is necessary to prevent and address attempts to hinder reporting or to impede, frustrate or slow down follow-up, in particular investigations, or attempts to find out your identity.

# PRIVACY NOTICE

In line with the rationale of the Procedure, it must be noted that only in **EXCEPTIONAL CIRCUMSTANCES**, which will be strictly assessed, and subject to appropriate safeguards, it is only possible to disclose your identity a) where you have consented to such disclosure; or b) where that is a necessary and proportionate obligation under Union or national law in the context of investigations by authorities or judicial proceedings, in particular to safeguard the rights of defence of persons concerned. The protection of confidentiality does not apply where you have intentionally revealed his or her identity in the context of a public disclosure.

We respect all rights relating to your personal data to which you are entitled under applicable law and will therefore always adhere to your request as required by law.

For identification purposes, we may ask you for a copy of the front of your identity card. We ask you to remove the picture on your identity card.

You can reach us via e-mail:



[PRIVACY@VANDEMOORTELE.COM](mailto:PRIVACY@VANDEMOORTELE.COM)



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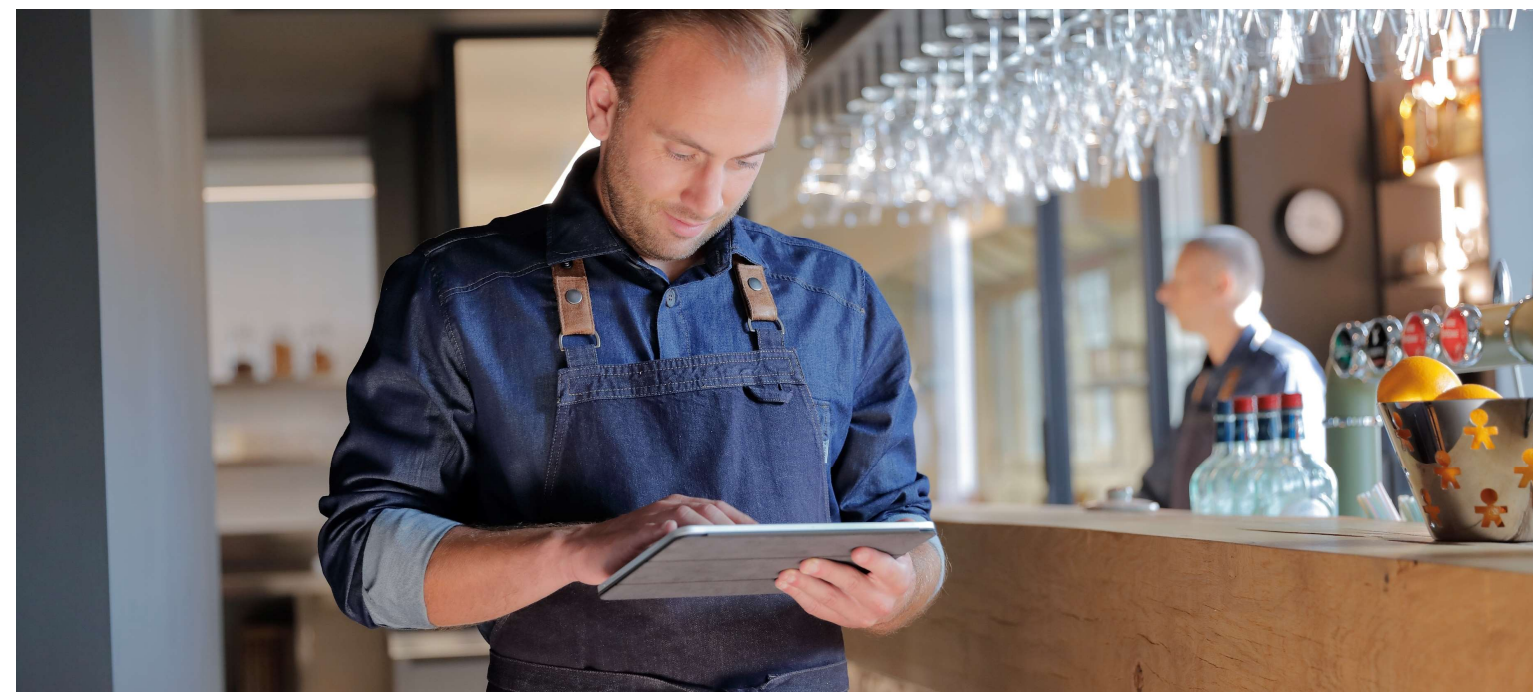




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This Privacy Notice may be amended from time to time, within the limits of the applicable data protection laws. Via our reporting tool you can always have [ACCESS TO THE MOST RECENT VERSION](#).



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**UPDATES**