eurofins

P R I V A C Y   N O T I C E

Whistleblowing Point of Contact

We at Eurofins ("Eurofins" or "we") believe that ethical and compliant behaviour is a core value of our business. Our clients, suppliers, employees and other stakeholders have to be able to rely on absolute integrity from our part, and we have to be able to rely on the integrity of our business partners.

Therefore, we encourage any individual who has genuine concerns about any form of malpractice or wrongdoing in any Eurofins company to raise those concerns with us, at the earliest stage possible, to maximise the opportunity for a thorough investigation and appropriate remediation. This Whistleblowing Point of Contact was established to provide you with a reliable and transparent channel to communicate your concerns to us. We also invite you to consult the Eurofins Group Whistleblowing Guidelines for various details of our Group's whistleblowing policy.

When raising a concern be assured that we respect you, and we are committed to honouring and protecting your privacy. We treat personal data in accordance with applicable data protection laws (specifically the EU General Data Protection Regulation – "GDPR"), and the purpose of this notice is to make you aware of what personal data we collect and how we process them for the purposes of verifying concerns reported via the Whistleblowing Point of Contact and investigating suspected compliance or legal violations.

The controller of your personal data is **Eurofins International Support Services LUX sàrl** with offices at: 23 Val Fleuri, L-1526 Luxembourg, Grand-Duchy of Luxembourg.

If you have any questions regarding this notice or if you want to lodge a request in relation to your personal information, please contact us via the following contact point:

dp-compliance@eurofins.com

What personal data do we collect and how will it be processed?

We need to process sufficient information from you to be able to properly investigate your concerns, including any evidence that you may share to support them. We will collect and process the following personal data:

- e-mail address from which the concern was reported;

- your name and surname as well as your other contact details, if you decided to provide them to us. Please note that you can choose to contact us anonymously, but we are more likely to be able to protect you, investigate your concerns[1] and keep you informed about our progress if you identify yourself;

- other information you have given to us, including the identity, position, location and contact details of individuals subject of your concerns and any potential witnesses.

If you identify yourself (i.e., do not raise your concerns anonymously), we will do everything reasonably practicable under applicable local law to protect your personal data and your identity. They will not be disclosed to third parties other than those indicated in this privacy notice, unless they need to be disclosed – in compliance with the principle of proportionality and in order to meet a legal obligation – to the relevant individuals and/or authorities involved in any further investigation and/or subsequent judicial proceedings conducted as a result of the investigation carried out.

---

[1] In certain cases, and some jurisdictions, anonymous reporting is not permitted, and we will not be able to take appropriate action if you do not disclose to us your identity.

eurofins

What are the purposes and legal grounds for processing personal data?

The personal data will be processed <u>exclusively</u> for the purposes of:

- recording and segregating your concerns, investigating allegations made in your report as well as preparing reports on the outcomes of relevant assessments and/or investigations;

- meeting a legal obligation imposed by applicable local laws, given the fact that whistleblowing systems are mandatory in some countries in which we are operating;

- pursuing a legitimate interest of ours, as provided for in Article 6(1)(f) of the GDPR, in ensuring compliance with Eurofins Group Code of Ethics, other Eurofins policies and procedures as well as applicable laws (such as labor, anti-bribery, modern slavery and other laws), throughout all of our operations, and facilitating provision of information regarding serious or sensitive concerns about any form of malpractice or wrongdoing, whether actual or soundly suspected, from individuals to Eurofins;

- enforcing or defending our rights before judicial courts, for no longer than is necessary for the purpose of safeguarding and executing such rights.

How are we securing personal data?

We have implemented industry standard security measures to keep personal data <u>secured and confidential</u>, including but not limited to:

- by way of limiting access to personal data to our <u>authorised</u> representatives (i.a., the Compliance Committee members) and providers responsible for recording, segregating and investigating your concerns, and <u>strictly on a need-to-know basis</u>;

- by implementing physical, electronic, administrative, technical and procedural safeguards (such as data minimisation, data partitioning, anonymisation, encryption) that comply with applicable laws and regulations to protect personal data from unauthorised or inappropriate access, alteration, disclosure and destruction.

For how long will we keep personal data?

We will endeavour to <u>permanently delete</u> from our records or anonymise (i.e., remove all personal identifiers without the possibility to restore them by any means) the personal data contained in a whistleblowing report within a reasonable amount of time after the conclusion of the relevant investigation, unless the investigation leads to disciplinary or legal proceedings, in which case we may need to retain the personal data until the conclusion of those proceedings and the period specified by applicable law.

With whom can we share personal data?

Personal data may be shared, strictly on a need-to-know basis, with Eurofins Legal Entities (https://www.eurofins.com/eles/) for the purposes of taking relevant remedial actions following the investigation and / or our external legal advisors or other experts (**data controllers**).

We may also send personal data to regulatory or law enforcement authorities if we believe in good faith that we are required by law to disclose them, in order to comply with any applicable law or order of a court of competent jurisdiction, or in connection with legal proceedings.

Where relevant, personal data will be shared only on the basis of relevant agreements that include appropriate safeguards for protecting personal data in compliance with respective data protection regulations.

Where personal data is to be shared with recipients outside European Union / European Economic Area, located in countries for which there is no adequacy decision of the European Commission, the

eurofins

relevant transfer mechanism shall be adopted, such as Binding Corporate Rules, standard data protection clauses (that can be found at https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en) or other applicable transfer mechanism.

What rights do you have in relation to processing of your personal data?

In relation to processing of your data you have the rights to: withdraw your consent at any time, access data, rectify data, restrict the processing of data, require erasure of data as well as object to the processing of data (where justified and our legitimate interest in processing such data is not overriding data subjects' interests or the fundamental rights and freedoms).

At all times, you also have the right to lodge a complaint to the national data protection authority in Luxembourg:

Commission Nationale pour la Protection des Données (CNPD)
Location : 1 Avenue du Rock'n'Roll, L-4361 Esch-sur-Alzette, Grand-Duchy of Luxembourg
Tel.: +352 26 10 60-1
https://cnpd.public.lu/en.html

By choosing to proceed with your report via this Whistleblowing Point of Contact <u>you agree</u> to the processing of your personal data for the purposes and in the manner indicated above.

eurofins