

Protection of personal data and related rights

In accordance with, in particular, Law No. 2016-1691 of 9 December 2016 on transparency, combating corruption and the modernisation of economic life ("Sapin 2 Act") and Law No. 2017-399 of 27 March 2017 on the duty of care of parent companies and contractors ("Duty of Care Act") and in order to be informed of any breach of any applicable law or regulation, Vivendi SE has provided a whistleblowing procedure.

In accordance with Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data ("GDPR") and Law No. 78-17 of 6 January 1978 on Information Technology, Data Files and Individual Liberties as amended ("French Data Protection Act"), all information concerning any processing carried out under this system is set out below in detail.

Any expression used in the present information notice, in the singular or plural form, beginning by a capital letter has, unless otherwise expressly defined hereunder, the meaning defined in Article 4 of GDPR.

I. Identity of the data controller

When the whistleblowing is given by a whistleblower who is in relation with Vivendi SE and/or where the reported facts involve solely its personal or collaborators (42, Avenue de Friedland – 75380 Paris Cedex 08 – Tel : 01 71 71 10 00), Vivendi SE acts as a unique Data Controller.

When the whistleblowing is given by a whistleblower who is in relation with any of Vivendi SE subsidiaries and/or where the reported facts involve its personal or collaborators, Vivendi SE and its relevant subsidiary act as Joint Data Controllers. To get any contact information concerning this subsidiary, please refer to its institutional website.

II. Purposes and legal bases of the processing

The purpose of the whistleblowing system is to collect reports relating to conduct or situations that contravene the applicable legislation and regulations, in particular corruption or influence peddling, anti-competitive practices, violation of economic sanctions, infringement of human rights and fundamental freedoms, endangering the health or safety of others, damage to the environment and discrimination or psychological or sexual harassment and to deal with such reports in an appropriate manner.

This system is introduced by Vivendi Group, both to comply with the legislation, especially the relevant provisions of the Sapin 2 Act and the Duty of Care Act and for the legitimate purposes of keeping it informed and able to take prompt and appropriate action in the event of a violation of any applicable legislation and regulations, including the GDPR and the French Data Protection Act.

III. Recipients

Personal Data collected via the whistleblowing system are sent to the main contact person in charge of investigating the admissibility of the report ("Principal Referent") and to his/her deputy.

If the alert is deemed admissible, Personal Data are then sent to the secondary contact persons specially appointed and authorised to process and manage the report according to the nature and description of the facts it discloses ("Secondary Referent") and to a limited number of Vivendi SE

(and the relevant subsidiary, where appropriate) staff members specifically identified and appointed for the purposes of managing the report.

In any case, Personal Data collected in the course of handling any report via the whistleblowing system may be viewed where appropriate by a limited number of authorised persons within the Vivendi SE (and the relevant subsidiary, where appropriate) Information Services Division, its Legal Affairs Division and its General Management

Finally, it is possible that in the context of the course of handling any report, some third-party providers can access punctually to Personal Data, which are subject to a contractual confidentiality commitment.

IV. Data retention period

Personal Data collected in connection with any handling of a report via the whistleblowing system are kept only for the time strictly required for the purposes for which they were collected.

- If the report is deemed inadmissible, all the related Personal Data are made anonymous within two (2) months of closure of the admissibility operations relating to the report.
- If the report is deemed admissible but no further action is taken, all related Personal Data are made anonymous within two (2) months of closure of the checking operations relating to the report.
- If the report is deemed admissible and further action is taken, as a disciplinary or litigation procedure is initiated against the person implicated and/or the whistleblower, all related Personal Data are kept in active basis until the end of the procedure. At the end of this procedure, Personal Data are archived for the appropriate statute of limitations in the light of the reported facts. At the end of such a period of retention, all related Personal Data are made anonymous.

For further details on the applicable archive retention times, please click on [archiving procedure](#).

V. Rights of Data Subjects

In accordance with Articles 15 *et seq.* of the GDPR, any Data Subject whose data are collected via the whistleblowing system has the right to ask Vivendi SE (and the relevant subsidiary, where appropriate) for access to his/her personal data, to rectify them and, if the conditions are met, to delete them, to restrict their processing, to object to such processing and to exercise the right to portability of his/her Personal Data.

Pursuant to French Data Protection Act, any Data Subject has the right to define instructions governing the retention, erasure, and communication of his/her Personal Data after its death.

Data Subjects may exercise their rights by writing to privacy@vivendi.com, stating their request and attaching proof of identity.

In any event, any Data Subject involved may refer any claim or complaint to the CNIL.