



Personal data protection charter For the year 2024

Edition of 10/01/2024

ARGAN attaches great importance to the protection of its employees' privacy and data.

The company ensures that it adopts and complies with a rigorous privacy policy that complies with the regulations in force, in particular the European General Regulation on the Protection of Personal Data n°2016/679 of 27 April 2016 (known as the GDPR) as well as all the rules of national law adopted in application thereof, on a subsidiary basis.

The present Charter describes in a clear, simple and complete manner the way in which ARGAN, in its capacity as data controller, collects and uses Personal Data and the means available to any person concerned to control this use and exercise the rights relating thereto.

Because of ARGAN's activity, the main parties concerned are employees, but third parties (suppliers, clients, prospects, shareholders, etc.) may occasionally be the subject of personal data collection and storage.

For this reason, points 4 to 8 of this charter concern employees (the majority of cases of processing of Personal Data at ARGAN) and point 9 concerns the more minor and less sensitive cases (due to the limited scope of information collected) of processing of Personal Data for third parties (suppliers, clients, prospects, shareholders, etc.).

As regards the processing of Personal Data collected with a view to recruitment or Personal Data collected with a view to human resources management, or information relating to third parties, the data controller is ARGAN.

1. Acceptance of this Personal Data Protection Charter

This Charter should be read carefully by each employee or any third party in contact with ARGAN in a contractual (existing or potential) or informational context (suppliers, clients, prospects, shareholders, etc.) in order to provide them with information on the nature of the Personal Data that ARGAN holds on its employees and job applicants, or any third party, and the way in which it is used.

"Personal Data" (hereinafter "PD") means any information collected and recorded in a format that allows you to be personally identified, either directly (e.g. your name) or indirectly (e.g. telephone number) as an individual. By agreeing to apply for a job with ARGAN, or by agreeing to the terms of your employment contract with ARGAN, or by contacting ARGAN for contractual (including potential) or informational purposes, you expressly agree to this Charter.

You acknowledge and accept that this Charter does not grant you any additional rights other than those provided for by law.

2. ARGAN's data protection principles

When collecting and processing your PD, ARGAN will inform you of the purpose of the processing, the recipients of the data, any transfers, how long your data will be kept and your rights.

Personal data are only collected and processed for the purposes described in this Charter and no further processing incompatible with the stated purposes will be carried out.

Only PD necessary for processing will be collected. ARGAN will take all reasonable steps to keep PD up to date and to ensure that inaccurate PD is deleted or rectified.

We will retain your PD for as long as is necessary for the purposes of data processing, in accordance with the provisions of this Charter and the requirements laid down by law.

You can access, modify, correct or delete your PDs by contacting the General Secretary (Aymar de Germy);

Argan implements reasonable technical and organisational measures to protect your PD against accidental or unlawful alteration or loss, or unauthorised use, disclosure or access.

3. Scope of application

This Charter applies to:

- ✓ All employees working for an ARGAN Group entity, including temporary staff and trainees;
- ✓ Applicants for a position within a Group entity;
- ✓ To any third party (suppliers, clients, prospects, shareholders, etc.) with whom ARGAN has occasional or regular relations requiring the initial collection and subsequent retention of PD in the context of existing or potential contractual relations or for information purposes.

4. What personal data is collected on employees?

To the extent permitted by law, we collect, process and store PD about you and your family and relatives, such as:

As part of the recruitment process:

- ✓ CV, application file drawn up by the recruitment agency, surname at birth, surname of wife or husband, first name, sex, date of birth, contact details (home address, e-mail address, personal telephone number), diplomas and university certificates, foreign languages spoken, curriculum vitae (detailing your professional experience and any further training), cover letter, disability status, psychological profile test if applicable.

As part of Human Resources management:

- ✓ **Identification details:** birth name, married name, first name, sex, date and place of birth, nationality, contact details (address, personal telephone number, e-mail address and name and telephone number of person to contact in an emergency), copy of identity document, copy of driving licence (company vehicles), copy of social security certificate, passport number (for employees travelling internationally), photos, bank details, social security number and, where applicable, degree of disability;
- ✓ **Family situation:** marital status, surname, first name and date of birth of your spouse or partner, surname, first name and date of birth of children, insurance, pension and contingency beneficiary information; Transport/Business travel: any information relating to the means of transport used by an employee, for the purposes of reimbursing travel expenses or organising business travels (preferences, location, etc.). E.g.: Navigo pass, expenses incurred by the use of a vehicle, etc.;
- ✓ **Continuing training:** nature and duration of courses attended;
- ✓ **Initial training and career:** diplomas and university certificates, foreign languages spoken, curriculum vitae (detailing your professional experience and any continuing training), situation in terms of mobility and career plan management, follow-up to annual performance appraisal, psychological profile test;
- ✓ **Professional life:** fixed-term contract, open-ended contract, part-time or full-time employment, date of recruitment, date of termination of contract, management, department, reporting line, employee identification number, job title, job information, telephone number and e-mail address, job description, working hours, absence (including sick leave, special leave or absence, maternity leave, parental leave), paid leave (where applicable), supporting documents for authorised absences (death certificate, marriage certificate, invoice for relocation, medical certificate for sick children, sick leave form), school attendance certificates, mandate as staff representative (as a member of the social and economic committee or a trade union), etc.;
- ✓ **Economic and financial situation:** tax deductions and withholding taxes, salary level, monitoring of salary and other remuneration elements, profit-sharing, commercial bonuses, free share allocation, PEI / PERCOI (employee retirement saving plans) monitoring, luncheon vouchers, mutual insurance, provident fund, related payments, pension fund contributions, bank details, third-party notices; All PD that ARGAN must collect in order to comply with its obligations as an employer under the law;
- ✓ **Your use of the ARGAN Information System:** the conditions under which your personal data is collected and processed in the context of your use of the ARGAN Information System (professional mail and server);

- ✓ **Whistleblowing system:** as part of its legal obligations, ARGAN has set up a whistleblowing system enabling employees to report unethical or inappropriate behaviour.

5. What sensitive personal data is collected for employees?

We may collect and process special categories of Personal Data about you. We may process such data if and insofar as such processing is necessary for the performance of the employment contract, or in connection with legal claims or when we are obliged to do so in order to comply with our legal or regulatory obligations.

The Group's whistleblowing system may also reveal any breaches or offences that you may have committed.

Data relating to your health, where processing is necessary for the purposes of fulfilling our obligations in terms of employment law, social security or social protection insofar as such processing is authorised by the applicable law or where processing is necessary for the purposes of preventive medicine, occupational medicine or assessing the employee's fitness for the job.

Where applicable, data revealing your sexual orientation (the processing of data relating to your family composition could incidentally reveal your sexual orientation (for example if you provide us with the name and sex of your partner)).

6. How is your personal data collected for employees?

Your PD may be collected by various means, including, in particular, for:

Recruitment:

- ✓ CV and letter of application to be sent by e-mail or post;
- ✓ All recruitment methods, including external recruitment agencies, job interviews and contacts with former employers.

Life at work:

- ✓ Interviews with the Human Resources department and paper or electronic data collection forms;
- ✓ Assessments;
- ✓ Modification of identification data;
- ✓ Proof of transport costs;
- ✓ Information relating to employee benefits, health, provident and retirement plans, etc.;
- ✓ Internal mobility at ARGAN.

Provision of information by third-party service providers:

- ✓ Recruitment service providers;
- ✓ Companies managing employee savings schemes, free share plans, etc.;
- ✓ The use of ARGAN's information systems.

7. What are the purposes of collecting employee data?

As part of a recruitment process:

- ✓ The purpose of the processing is to study the applications received, to conduct the selection process, to build up a "CV database" and to share information relating to talent identified within ARGAN;
- ✓ Applicants' PD are collected either directly or indirectly to enable us to assess the applicant's suitability to carry out the assignment (e.g. checking references and qualifications).

As part of Human Resources management:

- ✓ To comply with applicable law: for example, for management:
 - Maternity leave obligations,
 - The organisation of professional elections,
 - Diversity obligations,
 - Working hours,
 - Sick leave,
 - Payroll: salaries and benefits due under your employment contract, annual increments and any other salary adjustments, payment of annual bonuses and management of pensions; deductions for income tax and social security contributions;
- ✓ To manage employee mobility within ARGAN;
- ✓ To track employee benefits (e.g. meal vouchers);
- ✓ Administrative management of profit-sharing or free share plans, etc.;
- ✓ To facilitate the performance management and career development of employees, particularly in the context of annual appraisals, annual salary reviews and, where applicable, disciplinary sanctions in accordance with the law;
- ✓ To monitor the training and coaching plan.

Safety and control:

- ✓ For managing access to premises (distribution of keys and badges);
- ✓ Access to ARGAN's Information Systems.

General management:

- ✓ Planning and budget;
- ✓ Workforce;
- ✓ Internal directory management;
- ✓ Organisation chart;
- ✓ Employee file management;
- ✓ Financial report;
- ✓ For annual reports, which may include PDs for certain categories of employees, or internal and external communication media (which may contain photographs or videos of employees).

Disclosure to authorities:

When requested by the judicial authorities and/or police forces as part of a judicial investigation.

Subject to legal provisions, where ARGAN uses your PD to protect its rights or to support any claim, defence or statement in a case or before the judicial and/or administrative authorities, an arbitration tribunal or a mediator, in the context of disciplinary actions/investigations or an internal or external audit or investigation.

We are authorised to use your personal data as described above where:

- ✓ This is necessary in order to perform our obligations and exercise our rights under the contract of employment with us;
- ✓ It is necessary for us to fulfil our obligations under occupational medicine and to make decisions about your fitness for work;
- ✓ We have legal and regulatory obligations that we must fulfil;
- ✓ It may be necessary for us to establish, exercise or defend our rights or in connection with legal proceedings; or
- ✓ The use of your personal data as described may be processed on the basis of our legitimate interests (or the legitimate interests of one or more ARGAN Group companies), such as:
 - To enable us to administer and manage our business activities effectively and efficiently,
 - Ensuring a consistent approach to managing our employees,
 - Maintain compliance with internal policies and procedures, or
 - Be able to contact you or your family in an emergency.

8. Sharing your personal data with employees

ARGAN may share your PD with external or internal recipients in the following ways:

We may share your PD only where relevant, with authorised ARGAN staff who need access in order to carry out their duties as described above:

In-house:

- ✓ Your hierarchical superiors, the Head of Human Resources and the accounting managers, the members of the Supervisory Board, including those of the Appointments and Remuneration Committee, or in the context of a pre-litigation procedure or a dispute.

External service providers:

- ✓ Payroll managers, benefits providers and managers, IT systems providers, financial institutions, pension management bodies, insurance companies (including health and provident funds), consultants and professional advisers;
- ✓ Employment agencies or recruitment firms, temporary employment agencies and placement services;
- ✓ Other distributors and suppliers of goods and services, such as travel agencies and car hire companies;
- ✓ All other service providers involved in the provision of services to employees;
- ✓ Local authorities - internal investigations: We may share information with local authorities in accordance with applicable regulations, or as part of an internal investigation within the ARGAN Group;
- ✓ Tax authorities, social security services, judicial authorities, employment services or other authorities;
- ✓ Independent chartered accountants, authorised representatives of internal audit functions, such as statutory auditors or lawyers, company security officers and law firms;
- ✓ As part of internal or external audits and investigations, following a request from the police, administrative or judicial authorities or when required by applicable law, a court ruling or a regulation;
- ✓ Investors: Your PD may be disclosed in the context of a restructuring, sale or disposal of assets, merger or other changes in control or circumstances of ARGAN (or its subsidiaries), to potential investors and their auditors and legal advisors;
- ✓ Service providers as part of commercial proposals.

ARGAN will only share your PD if it is necessary for the purposes stated above.

ARGAN will ask recipients to maintain the confidentiality of your PD and to use it only in the context of the work they are carrying out for ARGAN.

9. Collection of personal data from third parties (other than employees) and uses

ARGAN may collect personal data from third parties (suppliers, customers, prospects, shareholders, etc.) in the course of its activities, in particular in the event that:

- ✓ You contact an ARGAN employee or you request one of our partners with a view to entering into a potential or certain contractual relationship with one of the companies making up the ARGAN Group (for more information on the scope of ARGAN, please refer to the regulated information published on argan.fr);
- ✓ You wish to send us your comments or questions, in particular via ARGAN's generic emails or those of ARGAN's employees; or
- ✓ You would like to receive information about our offers or services.

The personal data that you may be asked to communicate and which will then be kept by ARGAN may concern in particular your contact details (name, e-mail address, telephone number, country of residence, physical address, etc.).

The purpose of collecting this information remains purely in the interest of the potential or established relationship between ARGAN and third parties or in order to provide the best possible information in the case of a request for information purposes.

Under no circumstances are the DP collected intended to be monetised.

10. International transfers

For the purposes set out in Article 7 of this Charter, we may transfer your personal data to recipients outside the group, who may be located in countries offering different levels of protection for PD.

Consequently, in addition to the implementation of this Charter, ARGAN implements appropriate measures, including contractual clauses, to secure the transfer of your PI to an external recipient located in a country offering a level of protection different from that offered in the country in which the PI is collected.

ARGAN's business does not require transfers of DP processed by the Company outside the European Union. However, in the event of a transfer outside the territory of the European Union, ARGAN will ensure that adequate transfer mechanisms are adopted and implemented in accordance with Chapter V of the GDPR.

11. Data security

ARGAN takes appropriate technical and organisational measures in accordance with applicable legal provisions to protect your PD against accidental or unlawful destruction, accidental loss or alteration, or unauthorised disclosure or access.

To this end, technical measures (such as firewalls) and organisational measures (such as an identifier/password system, means of physical protection, etc.) have been put in place.

12. Data retention

We will store your PD only for as long as is necessary for the purposes set out in this Charter, or as required by applicable law.

13. Access and modification

You have the right to access and modify your PD collected by ARGAN, subject to applicable legal provisions.

These rights include:

- ✓ The right to obtain information about the processing of your personal data and access to your personal data held by us;
- ✓ The right to withdraw your consent to the processing of your personal data at any time where the processing concerned is based on consent. Please note, however, that we may still be entitled to process your personal data if the processing is based on legal grounds other than consent, and in particular if it is necessary for the performance of the employment contract, if it is necessary for compliance with a legal or regulatory obligation or if it is carried out on the basis of our legitimate interest;
- ✓ In certain circumstances, the right to receive personal data in a structured, commonly used and machine-readable format and/or to request that we transfer such data to a third party where technically possible. Please note that this right only applies to personal data that you have provided to us;
- ✓ The right to request that we rectify your personal data if it is inaccurate or incomplete;
- ✓ The right to request erasure of your personal data in certain circumstances. Please note that there are circumstances in which you may ask us to erase your personal data but for which we have the right to retain it;
- ✓ The right to object to, and the right to request the restriction of, the processing of your personal data in certain circumstances. Again, there may be circumstances in which you object to, or request us to restrict, the processing of your personal data but we are legally entitled to continue processing your personal data and/or refuse your request;
- ✓ The right to lodge a complaint with the CNIL if you believe that one or more of your rights have been violated by our company;
- ✓ The right to define instructions regarding the fate of your data after your death.

You can exercise your rights by contacting the General Secretary (Aymar de Germay). You can also contact him by e-mail for any questions or complaints regarding the processing of your personal data: aymar.degermay@argan.fr

You have the right to submit a complaint to the supervisory authority competent to deal with it. This is the:

Commission Nationale de l'Informatique et des Libertés (CNIL) (French Data Protection Authority)

3 Place de Fontenoy - TSA 80715 - 75334 Paris CEDEX 07

Tel.: 01 53 73 22 22

14. Coming into force, amendments and updates

This Charter came into force on January 15, 2024. No changes have been made to it as of this date. Any new editions will be dated in this section at a later date.

ARGAN reserves the right to modify the present Charter. In particular, updates may result from changes in applicable legislation. We therefore invite all parties concerned to regularly read the present Charter as published on the company website (argan.fr), or for employees on the internal server.

15. Legal and regulatory texts take precedence

In the event of the application of legal and regulatory provisions that are more restrictive than those provided for in this Charter, the said provisions shall take precedence over the clauses of this Charter.