

Reporting Privacy Notice

1 **PURPOSE**

The aim of this Reporting Privacy Notice is to ensure a high level of protection and transparency for all individuals whose personal data will be collected by respective Syngenta Legal entity (“Syngenta”, “Syngenta Group”, “we” or “us”) in EU in connection with a report made. Reporting wrongdoings, misconduct, or law violations is voluntary. You can make a report without mentioning your name or any other information about yourself in the report, if you wish (anonymous report) and if anonymous reporting is not excluded in the given country. If your report contains personal data, please make sure it is limited to what is necessary to process and resolve the case.

2 **WHO WILL BE RESPONSIBLE FOR PROCESSING YOUR DATA?**

If your report concerns only the Syngenta entity or entities in your country (e.g. you report issues concerning your employer or other employees, or your report relates to the activities of our local entity) and the report is managed entirely locally, the Syngenta entity in your country is the controller of your personal data. If there are multiple Syngenta entities in your country, the entity to whom you send your report to is your data controller. If several Syngenta entities in your country are affected by your report, all the affected entities are your data controllers jointly). Please check the table below to find out contact details of personal data controllers in your country.

However, if other Syngenta entities are impacted by your report, or your report has been escalated to the Group level and is managed with the support of the Group Compliance both Syngenta entity in your country and our parent company, Syngenta Crop Protection AG, a Swiss corporation based in Basel, Switzerland (“**Syngenta Parent**”) are jointly responsible for the collection and use of your personal data.

If issues raised in your report relate to the entire Syngenta Group or the report is managed by the Group Compliance, then *Syngenta Parent* is the sole controller of your personal data.

3 **WHAT INFORMATION (PERSONAL DATA) DO WE COLLECT AND PROCESS**

If you decide to provide personal data in your report, we may process the following information:

3.1 **Ordinary personal data**

- Your name, job position and contact details,
- name, job position, contact details and other data of the individual(s) mentioned in your report (such as witnesses, persons concerned, or third parties),
- reported facts,
- elements gathered during the investigation,
- report of the investigative actions,
- outcome of the investigation.

If you register for the web-based SYNGENTA Compliance Helpline , you will be asked to provide us with the following personal data (although only the data marked by an (*) are mandatory:

- Your login credentials for the tool (*),
- Language (*),
- Whether you are a Syngenta employee or an external contributor or a third party,
- Whether you want to remain anonymous (*),
- Your contact details (name, address, e-mail address, phone number),
- Any optional information that you record about yourself.

3.2 Special Categories of Data

Providing Special Categories of Data¹ in a report is voluntary. If Special Categories of Data provided in the report turn out to be irrelevant for the case, we will immediately delete it. Please do not reveal Special Categories of Data about yourself or anyone else if not necessary for us to understand or resolve the case or protect you or others.

3.3 Sources of the personal data

Personal Data Directly from You: As a rule, we collect personal data directly from you via the Syngenta Compliance Helpline or a local EU Whistleblowing Reporting Channel

Personal Data from Third Parties: We may receive personal data from your colleagues, supervisors, third parties (such as our contractors or clients), or otherwise generate such data during investigation.

4 WHY DO WE COLLECT AND HOLD YOUR PERSONAL DATA AND WHY ARE WE ALLOWED TO DO SO

We may process your personal data for the following purposes.

Purpose	Legal Basis
<p>Handling reports and investigation We process your personal data to manage in a safe and efficient manner all reports made under our Whistleblowing Policy, including:</p> <ul style="list-style-type: none"> – analysis, storage and follow up on reports, – identification and exclusion of irrelevant or false reports, – investigation of reported facts (where relevant), – necessary actions to stop wrongdoings, misconducts, or law violations, preserve evidence and defend rights of our employees or Syngenta’s rights and assets, – protecting privacy, rights and safety of the reporting person, witnesses and third parties mentioned in the Report as well as the rights of the person concerned. 	<p>Depending on the case, the processing may be based on:</p> <ul style="list-style-type: none"> • the need to comply with our legal obligations², given the fact that implementing whistleblowing systems is mandatory in some countries where Syngenta operates (Art. 6(1)c GDPR³), • our legitimate interests, more specifically to monitor compliance with our Code of Conduct and other internal regulations (Art. 6(1)f GDPR).
<p>Special Categories of Data We may process Special Categories of Data to carry out investigation, confirm reported facts and allegations and to take actions to stop detected wrongdoings, misconducts, or law violations.</p>	<p>Depending on the case, the processing may be necessary:</p> <ul style="list-style-type: none"> • to perform obligations and/or exercise specific rights of the employer or employee in the field of employment and social protection law (Art. 9(2)b GDPR); • to establish, exercise or defend a legal claim (Art. 9(2)f GDPR); • (in exceptional cases) for reasons of substantial public interest (Art. 9(2)g GDPR);

5 SHARING YOUR PERSONAL DATA

We may share your personal data between Syngenta Group affiliates (i.e., Intra-Group) or with other recipients for the following reasons.

¹ “Special Categories of Data” - data that reveal race or ethnicity, political opinions, religious or philosophical beliefs, trade union membership, health, sex life or sexual orientation, physical or mental health, or that include genetic data, or biometric data.

² We may process your personal data to comply with our legal obligations set out for example in the *Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law* and implementing acts which impose an obligation on companies to implement internal and external reporting procedures to detect and react to breaches of law. We may process your data also on the basis of national legislation in your country.

³ “GDPR” - Regulation (EU) 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, and repealing Directive 95/46/EC (General Data Protection Regulation).

5.1 Intra-Group

We may share your personal data between Syngenta Group affiliates, for all the purposes specified in Section 4 of this Notice. Syngenta Parent has concluded Intragroup Data Transfer Agreements (IDTAs) with many of its subsidiaries (Syngenta DP Network), including us, to enable the effective and secure transfer and processing of personal data.

Access to personal data is granted on a need-to-know basis, and in all cases provided data remain confidential.

5.2 Other Recipients

We also share your personal data with service providers that have been selected by Syngenta to perform specific activities on our behalf (such as operators of Help Line Navex or technology companies which provide software and computing services (e.g., e-mail, telecommunications, and information management services). We may also share personal data with governmental and public authorities when required by law.

6 INTERNATIONAL TRANSFER OF PERSONAL DATA

We may transfer your personal data to Syngenta Parent as well to China National Agrochemical Corporation in China. Switzerland have been officially recognized by the European Commission as providing an adequate level of protection for personal data. When we transfer your personal data to recipients located in other third countries (i.e. outside of the European Economic Area) which have not been officially recognized by the European Commission as adequate, transfers take place using an acceptable data transfer mechanism, such as the EU Standard Contractual Clauses (see [here](#)), or in exceptional circumstances on the basis of permissible statutory exceptions.

7 HOW LONG DO WE KEEP YOUR PERSONAL DATA

We will keep your personal data and data of others for the time necessary to defend claims or due to other applicable laws. If the investigation revealed misconduct or other violations, we may keep personal data for the time necessary to remove the consequences of the misconduct or violation identified.

8 YOUR RIGHTS

8.1 Rights of individuals

You have the right to access your personal data and obtain a copy of the information that we hold about you. You have the right to correct any inaccurate or incomplete data, object to the processing of your personal data and request restriction of processing in certain instances. You can also request the deletion of your personal data if there is no good reason for us to continue processing it.

Certain rights are subject to restrictions or limitations, and their availability may depend on the lawful basis we rely on to process your personal data (see section 4 above). Further, we may rely on applicable exemptions under applicable law to deny part or all your request. If we do so, we will inform you when responding to your request.

If you wish to exercise any of your above rights, please see Section 9 to check how you can contact us.

8.2 Right to lodge a complaint

You also have the right to lodge a complaint with a Supervisory Authority, in the EU Member State of your residence, place of employment, or the location where the issue that is the subject of the complaint occurred. Please check the table below for the Supervisory Authority in your country.

9 CONTACT

To exercise your rights or if you have any questions regarding this Reporting Privacy Notice, please contact the relevant Syngenta legal entity in your country via email or via post at the registered office address as provided in the table below.

Country	Data Controller	Syngenta Contact	Supervisory Authority
Hungary	Syngenta Kft. Alíz utca 2 1117 Budapest Hungary	dataprivacy.hu@syngenta.com	Hungarian National Authority for Data Protection and Freedom of Information (details available at https://naih.hu).
	Syngenta Services Kft. Alíz utca 2 1117 Budapest Hungary		
Switzerland	Syngenta Crop Protection AG Rosentalstrasse 67 4058 Basel Switzerland	dataprivacy.ch@syngenta.com	Federal Data Protection and Information Commissioner (FDPIC) (www.edoeb.admin.ch).
Belgium	Syngenta Seeds N.V. Devgen N.V. Technologiepark 30 9052 Ghent-Zwijnaarde Belgium	dataprivacy.be@syngenta.com	Gegevensbeschermings-autoriteit (www.gegevensbeschermingsautoriteit.be)
	Syngenta Crop Protection N.V. Avenue Louise 489 1050 Brussels Belgium		
	Syngenta Chemicals B.V., Belgian Branch Rue de Tyberchamps 37 7180 Seneffe Belgium		
Bulgaria	Syngenta Bulgaria EOOD Tsarigradsko Shosse blvd, 145 Sofia Office Center, fl. 6 1784 Sofia Bulgaria	dataprivacy.bg@syngenta.com	Commission for Personal Data Protection (https://www.cdpd.bg/en/index.php)
Czech Republic	Syngenta Czech s.r.o., se sídlem Bucharova 1314/8 Praha 5, 150 00	dataprivacy.cz@syngenta.com	Úřad pro ochranu osobních údajů https://uouu.gov.cz/
France	Syngenta France SA 1228 Chemin de l'Hobit, 31790 Saint-Sauveur France	dataprivacy.fr@syngenta.com	Commission nationale de l'informatique et des libertés (https://www.cnil.fr/en)
	Syngenta Production France S.A.S 55, rue du Fond du Val – 27600 Saint-Pierre-la-Garenne France		

<p>Germany</p>	<p>Syngenta Seeds GmbH Zum Knipkenbach 20 32107 Bad Salzuflen Germany</p>	<p>de.datenschutz@syngenta.com</p>	<p>Federal: Bund: Der Bundesbeauftragte für den Datenschutz und die Informationsfreiheit States: - Baden-Württemberg: The state commissioner for data protection and freedom of information for Baden-Württemberg - Bavaria (public sector): The Bavarian State Commissioner for Data Protection - Bavaria (private area): Bavarian State Office for Data Protection Supervision - Berlin: Berlin Commissioner for Data Protection and Freedom of Information - Brandenburg: The state commissioner for data protection and the right to inspect files in Brandenburg - Bremen: The State Commissioner for Data Protection and Freedom of Information of the Free Hanseatic City of Bremen - Hamburg: The Hamburg Commissioner for Data Protection and Freedom of Information - Hesse: The Hessian data protection officer - Mecklenburg-Western Pomerania: The State Commissioner for Data Protection and Freedom of Information Mecklenburg-Western Pomerania - Lower Saxony: The State Commissioner for Data Protection for Lower Saxony - North Rhine-Westphalia: State Commissioner for Data Protection and Freedom of Information for North Rhine-Westphalia - Rhineland-Palatinate: The state representative for data protection and freedom of information for Rhineland-Palatinate - Saarland: Independent Data Protection Center Saarland - State Commissioner for Data Protection and Freedom of Information - Saxony: Saxon data protection officer</p>
	<p>Syngenta Agro GmbH Lindleystrasse 8 D 60314 Frankfurt am Main Germany</p>		

			<p>- Saxony-Anhalt: State Commissioner for Data Protection for Saxony-Anhalt</p> <p>- Schleswig-Holstein: Independent State Center for Data Protection Schleswig-Holstein</p> <p>- Thuringia: Thuringia State Commissioner for Data Protection and Freedom of Information</p>
Greece	Syngenta Hellas Single Member S.A.C.I.Anthoussas Avenue 153 49 Anthoussas Attikis Athens Greece	dataprivacy.gr@syngenta.com	Αρχή Προστασίας Δεδομένων Προσωπικού Χαρακτήρα (https://www.dpa.gr)
Italy	Syngenta Italia S.p.A. Viale Fulvio Testi 280/6, 20126 Milano Italy	dataprivacy.it@syngenta.com	Garante per la protezione dei dati personali. (https://www.garanteprivacy.it/)
Netherlands	Syngenta Seeds B.V. Westeinde 62 1601 BK Enkhuizen The Netherlands	dataprivacy.nl@syngenta.com	Autoriteit Persoonsgegevens (www.autoriteitpersoonsgegevens.nl)
	Syngenta Crop Protection B.V. Jacob Obrechtlaan 7 4611 AP Bergen op Zoom The Netherlands		
Poland	Syngenta Polska Sp.z.o.o. Ul. Szamocka 8 01-748 Warsaw Poland	dataprivacy.pl@syngenta.com	Urząd Ochrony Danych Osobowych (https://uodo.gov.pl/)
Romania	Syngenta Agro SRL Victoria Park, 73-81 București-Ploiești road, 3rd building, 4th floor, 1st district Bucharest, 013685 Romania	dataprivacy.ro@syngenta.com	Autoritatea Națională de Supraveghere a Prelucrării Datelor cu Caracter Personal (https://www.dataprotection.ro/)
Spain	Syngenta España, S.A.U.	dataprivacy.es@syngenta.com	Agencia Española de Protección de Datos (https://www.aepd.es/es)

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10. UPDATES

You can find out when this Reporting Privacy Notice was last amended by checking "LAST REVISED" at the top of this page. You may print, download, or otherwise retain a copy of this Privacy Notice (and of any revised version) for your records.