

## PRIVACY POLICY FOR WHISTLEBLOWER SYSTEM

### 1. THE OBJECTIVE OF PROCESSING PERSONAL DATA IN THE WHISTLEBLOWER SYSTEM

The objective of this Privacy Policy is to describe the processing of personal data in the shared whistleblower system of Dansk Ejerkapital as, according to Articles 13 and 14 of the General Data Protection Regulation, the starting point is that the comprised companies are to provide information about their processing of personal data.

A list of the comprised companies can be found on the frontpage of the whistleblower portal and in the whistleblowing policy.

The objective of processing personal data in the whistleblower system is to acquire knowledge of any violations of EU law (covered by the scope of application of the Whistleblowing Directive), serious offences and other serious matters including suspicion or knowledge of any illegal, unethical or irregular conduct concerning the comprised companies for the purpose of preventing, limiting and following up on such matters.

The company to which a report is submitted is the data controller of the personal data that are being processed in the whistleblower system that are about the activities of the company in question. The data come from the group of persons who submit the reports to the system.

### 2. CATEGORIES OF PERSONAL DATA THAT WILL BE PROCESSED

A report may contain personal data, including both non-sensitive and sensitive data, about the whistleblower himself/herself. Reports may also contain non-sensitive and sensitive personal data about the person(s) about whom a report is submitted. The report may also contain data about other persons.

If provided in connection with the report, the whistleblower's name and contact details will be processed. Other personal data that the whistleblower provides about himself/herself in the report, if any, will also be processed.

Any data in the report about any affected persons and other persons will be processed. The collected data could be the name(s), position(s) and any other data about the affected person(s) and other persons. A

report will typically contain information about the specific serious matter that is reported and how the affected person, if any, is alleged to have been part of such matter.

A report may include documents in the broad sense, including text, pictorial and video material.

All personal data collected through the system will be treated as confidential to the maximum extent possible.

### **3. PROCESSING BASIS**

Processing of personal data in the whistleblower system is necessary in order to be able to investigate and prevent serious matters at the company to which a report is submitted and necessary for the company in question to be able to deal with reports in its compulsory whistleblower system, see section 22 of the Danish Act on the Protection of Whistleblowers, cf Article 6(1)(c) of the General Data Protection Regulation.

Accordingly, information about any criminal offences, including any assumed criminal offences, is processed under the authority of section 22 of the Danish Act on the Protection of Whistleblowers, cf Article 8(5) of the Danish Data Protection Act.

In some cases, a report will contain sensitive personal data such as trade union membership, race or ethnic origin, political opinion, religion, health status, sex life and biometric data. Such data are processed under the authority of section 22 of the Danish Act on the Protection of Whistleblowers, cf Article 9(2)(g) of the General Data Protection Regulation.

### **4. RIGHTS**

When the company to which the report is submitted registers data about the persons mentioned in the report, data about the whistleblower himself/herself or other persons mentioned in the report, such persons have a right under Article 15 of the General Data Protection Regulation to get insight into the personal data that are being processed about them.

But the right of access does not apply if it is found that the person's interest in receiving data about himself/herself should be superseded by important considerations for public or private interests, see section 22 of the Danish Data Protection Act.

The person also has a right to object to the processing of data and to request that data be corrected, restricted or erased in compliance with the data protection legislation in force from time to time, see Articles 16-18 and 21 of the General Data Protection Regulation.

## 5. STORING AND ERASING PERSONAL DATA

Personal data processed in connection with reports are kept as long as necessary for the sake of the investigation of the reported matter and the further course of events.

If the initial screening of the reported matter shows that the report is not covered by the whistleblower system or that there is no proof of the reported matter, it will generally not be necessary to keep the report and it will be erased as soon as possible by the company to which the report is submitted. But it will always depend on a specific assessment how long it will be necessary to keep the report.

If the initial screening of the reported matter shows that it is not unlikely that the reported matter has taken place, the company to which a report is submitted will launch a thorough investigation and at the earliest erase the report and the personal data included in the report when the investigation has been concluded.

## 6. PASSING ON AND DISCLOSING PERSONAL DATA

The company to which a report is submitted *gives* the data received to Law Firm Poul Schmith which as the data processor for the company to which a report is submitted is in charge of the initial screening of the received reports.

The company to which a report is submitted does not generally *disclose* personal data collected through the whistleblower system to third parties.

But the following types of disclosure could take place on a case-by-case basis:

- Disclosure to an external advisor, for example an attorney or an auditor, for the purpose of a detailed investigation of the reported matters
- Disclosure to relevant authorities, including the police and the prosecution service, in contemplation of any legal proceedings
- Other disclosure according to any statutory requirements

## 7. COMPLAINT

You are entitled to lodge a complaint with the Danish Data Protection Agency if you are dissatisfied with the way in which we are processing your personal data. You can find the contact details of the Danish Data Protection Agency at [www.datatilsynet.dk/english](http://www.datatilsynet.dk/english).

## 8. CONTACT DETAILS

Please address any questions about your rights etc in connection with the processing of personal data in the system to the company to which a report is submitted:

### **ICEpower A/S**

Vandtårnsvej 62A, 3B  
DK-2860 Søborg  
Email: [info@icepower.dk](mailto:info@icepower.dk)  
Tel: +45 31 71 00 01

### **John Bjerrum Nielsen A/S**

Industrivej 5  
DK-6740 Bramming  
Email: [kj@bjerrum-nielsen.dk](mailto:kj@bjerrum-nielsen.dk)  
Tel: +45 75 17 44 88

### **Sports Group Denmark A/S**

Skærskovgårdsvej 5  
DK-8600 Silkeborg  
Email: [info@sports-group.dk](mailto:info@sports-group.dk)  
Tel: +45 35 11 45 55

### **Wila A/S**

Mads Clausens Vej 14  
DK-8600 Silkeborg  
Email: [mail@wila.dk](mailto:mail@wila.dk)  
Tel: +45 86 80 08 44

### **Aabo-Ideal A/S**

Industrivej 7  
DK-5600 Faaborg  
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Tel: +45 62 61 61 25  
Contact details of the data protection officer (DPO): email [gdpr@aabo-ideal.com](mailto:gdpr@aabo-ideal.com)

### **Tic Elkas A/S**

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