

SUND & BÆLT HOLDING A/S – WHISTLEBLOWER SCHEME PRIVACY POLICY

This privacy policy sets out how Sund & Bælt Holding A/S ("Sund & Bælt"), "we" or "us") processes personal data in connection with reports to the whistleblower scheme.

A more detailed description of the personal data processing that takes place follows below and includes the rights you have if a report is made about you via the whistleblower scheme. This also covers your rights if you use the whistleblower scheme to make a report about another person.

Reference is also made to separate guidelines and process descriptions for the whistleblower scheme, which includes who can make reports and who can be reported on.

This policy only relates to the handling and investigation of reports to the whistleblower scheme. This means that the policy concerning employees must therefore be seen in the context of the HR privacy policy and other relevant policies and procedures.

1 DATA CONTROLLER

The legal entity responsible for the processing of your personal data is:

Sund & Bælt Holding A/S

Cvr-nr.: 15 69 46 88

Vester Søgade 10

1601 Copenhagen V

Tel.: 33 93 55 00

2 DESCRIPTION OF THE PROCEDURE

Purpose	Categories of personal data	Sources	Processing basis	Recipients	Retention
<p>Handling and investigation of reports to the whistleblower scheme concerning:</p> <ul style="list-style-type: none"> The person being reported on 	<p>We may process the following categories of personal data about you:</p> <p>General personal data:</p> <ul style="list-style-type: none"> Name, e-mail, telephone number, Other information included in the report <p>Sensitive information and information about actual and potential offences may be included in the processing.</p>	<p>We may collect information from the following sources:</p> <ul style="list-style-type: none"> Employees Management board members Board members Suppliers Partners Auditors Lawyers (potentially others who can use the whistleblower scheme) Social Media 	<p>We process your personal data under the following processing basis:</p> <ul style="list-style-type: none"> Article 6.1.f (Necessary for the pursuit of Sund & Bælt's legitimate interests by being able to investigate reports via the whistleblower scheme) Article 9.2.b (necessary for the purpose of complying with work, health and social law obligations), cf. DBL § 7(2) and § 12. Article 9.2.f (necessary for legal claims to be determined, to stand or be defended) DBL § 8 concerning information on criminal matters and criminal convictions DBL § 11 concerning CPR number 	<p>We may share your personal data with:</p> <ul style="list-style-type: none"> Plesner law partnership IT suppliers External advisers The police Public authorities 	<p>We will retain personal data for as long as it is necessary for the purposes listed.</p> <ul style="list-style-type: none"> The information is retained for as long as the investigation is ongoing. The retention period thereafter will depend on the outcome of the investigation. If the report falls outside the whistleblower scheme, but otherwise does not appear to be unfounded, the information is passed on to the HR manager, where it is processed as described in the privacy policy for HR administration. If a report is made to the police or another authority, the information will be retained for at least as

					<p>long as the investigation is ongoing with the police/authority.</p> <ul style="list-style-type: none">• If, on the basis of the information collected, a disciplinary sanction is implemented against the reported person or there are otherwise reasons why it is factual and necessary to continue to retain the information about the reported person, the information is retained in the person's personnel file and deleted in accordance with the deletion policy for employee data.• If the report turns out to be unfounded, the personal data will be deleted within 6 months from the establishment that the report was considered unfounded.• In other situations, it is specifically assessed as to whether there are factual reasons for
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					retaining the information and, if so, for how long.
<p>Handling and investigation of reports to the whistleblower scheme concerning:</p> <ul style="list-style-type: none"> • The person who made the report <p>This purpose does not include the processing of the reported information – see above.</p> <p>If it is suspected that there is a deliberately false report, this purpose also includes investigating the reporter in such situations</p>	<p>We may process the following categories of personal data about you provided that you do not choose to make an anonymous report:</p> <p>General personal data:</p> <ul style="list-style-type: none"> • Name, email, phone number, • Content of your report • Supplementary information from those listed under "Sources" in cases where it is suspected that a deliberately false report has been made. <p>As a rule, sensitive information and information about legal offences and criminal convictions about you are not processed in the handling of the whistleblower report itself – unless you choose to include such</p>	<p>We may collect information from the following sources:</p> <ul style="list-style-type: none"> • You • Employees • Management board members • Board members • Suppliers • Partners • Auditors • Lawyers • (others who can use the whistleblower scheme) • Social Media 	<p>We process your personal data under the following processing basis:</p> <ul style="list-style-type: none"> • Article 6.1.f (Necessary for the pursuit of Sund & Bælt's legitimate interests by being able to investigate reports via the whistleblower scheme) • Article 9.2.b (necessary for the purpose of complying with work, health and social law obligations), cf. DBL § 7(2) and § 12. • Article 9.2.f (necessary for legal claims to be determined, to stand or defended) • DBL § 8 concerning information on criminal matters and criminal convictions • DBL § 11 concerning CPR number 	<p>We may share your personal data with:</p> <ul style="list-style-type: none"> • Plesner law partnership • IT suppliers • External advisers • The police • Public authorities 	<p>We will retain personal data for as long as it is necessary for the purposes listed.</p> <ul style="list-style-type: none"> • The information is retained for as long as the investigation is ongoing. The retention period thereafter will depend on the outcome of the investigation. • If the report falls outside the whistleblower scheme, but otherwise does not appear to be unfounded, the information is passed on to the HR manager, where it is processed as described in the privacy policy for HR administration. • If a report is made to the police or another authority, the information will be retained for at least as long as the

	<p>information about yourself in the report.</p> <p>However, information about legal offences or possible legal offences may be included in the processing if it is suspected that a knowingly false report has been made.</p>				<p>investigation is ongoing with the police/authority.</p> <ul style="list-style-type: none">• If, on the basis of the information collected, a disciplinary sanction is implemented against the person who made the report, or there are reasons why it is substantive and necessary to continue to retain the information about the person who made the report, the information is retained in the person's personnel file.• If the report turns out to be unfounded, the personal data will be deleted within 6 months from the time that the report was deemed unfounded.• In other situations, it is specifically assessed as to whether there are factual reasons for retaining the information and, if so, for how long.
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3 INFORMATION TO THE REPORTED EMPLOYEE AND RECTIFICATION

If you are the subject of a report via the whistleblower scheme, you will be notified as soon as possible after a preliminary investigation has been undertaken and all relevant evidence has been secured; and in this connection you will receive information about:

- The identity of the person(s) responsible for investigating the report
- A description of the content of the allegations
- Who has seen the report

As set out below in the section on your general rights, you have the right to access the report submitted about you. However, you do not have the right to be informed of the identity of the person who submitted the report – regardless of whether the report was made anonymously or the identity of the reporter is known.

If it is concluded that this is a deliberately false report, you will then be able to find out who filed the report against you if the identity of the reporter is known.

You also have the right to request that the information in the report that you believe is incorrect, misleading, incomplete or out of date be rectified. If your request cannot be met, the information will be annotated with your comments.

4 CONSEQUENCES OF PROCESSING

Reporting to and investigation of reports to the whistleblower scheme can have significant consequences for the person reported. This is because reports relate to violations or suspected violations of the legislation, as otherwise defined in the separate guidelines and process description for the scheme.

Correspondingly, reporting to the whistleblower scheme can have significant consequences for the person who made the report if it is a deliberately false report. Such cases can have, among other things, criminal consequences.

5 TRANSFERS TO COUNTRIES OUTSIDE THE EU/EEA

Your personal data is not transferred to countries outside the EU/EEA.

6 YOUR GENERAL RIGHTS

Your rights are as follows:

- You have the right to request access to, correction of or deletion of your personal data.
- You also have the right to object to the processing of your personal data and to have the processing of your personal data restricted.
- As a general rule, you have the unconditional right to object to the processing of your personal data for use in direct marketing
- If the processing of your personal data is based on your consent, you have the right to revoke your consent at any time. Your revocation will not affect the legality of the processing carried out prior to your revocation of your consent.
- You have the right to receive the personal data that you yourself had submitted in a structured, commonly used and machine-readable format (data portability).
- You have the right to file a complaint with a data protection authority, e.g. Datatilsynet.

There may be conditions or limitations to these rights. It is therefore not certain that you, for example, have the right to have information about you deleted in the specific case. This is because it depends on the specific circumstances associated with the processing activities.

You can make use of your rights by contacting HR manager Marina Manniche Suhr, mms@sbfdk.

7 RIGHT TO JUDICIAL TRIAL

If legal action is taken against you as a result of a report and subsequent investigation, you have the right to take the matter to court.

8 QUESTIONS

If you have any questions regarding this policy, please contact: Marina Manniche Suhr, mms@sbfdk

Last updated: September 11, 2019