

# PRIVACY POLICY FOR THE WHISTLEBLOWER SCHEME

## THE SUND & BÆLT GROUP

This privacy policy explains how the Sund & Bælt Group ("**Sund & Bælt**", "**we**" or "**us**") processes personal data in connection with reports to Sund & Bælt's whistleblower scheme.

This section describes in more detail the processing of personal data that takes place and the rights that you have if anyone reports on you via the whistleblower scheme, and your rights if you use the whistleblower scheme to submit a report on someone else.

Refer also to Sund & Bælt's whistleblower policy, where you can read about who can submit reports and who may be reported on.

This policy only concerns the handling and investigation of reports submitted under the whistleblower scheme. With regard to employees, the policy should therefore be viewed in conjunction with Sund & Bælt's other relevant policies and procedures.

### 1 DATA CONTROLLER

The legal entity responsible for the processing of your personal data is the company that your report concerns:

<u>Sund &amp; Bælt Holding A/S</u> VAT no: 15 69 46 88 Vester Søgade 10 DK-1601 Copenhagen V	<u>Sund &amp; Bælt Partner A/S</u> VAT no: 26 01 91 33 Vester Søgade 10 DK-1601 Copenhagen V	<u>Brobizz A/S</u> VAT no: 31 85 48 22 Vester Søgade 10 DK-1601 Copenhagen V	<u>A/S Storebæltsforbindelsen</u> VAT no: 10 63 49 70 Vester Søgade 10 DK-1601 Copenhagen V
<u>Brobizz Operatør A/S</u> VAT no: 39 14 42 39 Vester Søgade 10 DK-1601 Copenhagen V	<u>A/S Femern Landanlæg</u> VAT no: 32 56 79 67 Vester Søgade 10 DK-1601 Copenhagen V	<u>Femern Bælt A/S</u> VAT no: 28 98 65 64 Vester Søgade 10 DK-1601 Copenhagen V	<u>A/S Øresundsforbindelsen</u> VAT no: 15 80 78 30 Vester Søgade 10 DK-1601 Copenhagen V

<u>Havnetunnellen A/S</u> VAT no: 4732864238967 Vester Søgade 10 DK-1601 Copenhagen V	<u>Kattegatforbindelsen A/S</u> VAT no: 15 69 46 88 c/o Sund & Bælt Holding Vester Søgade 10 DK-1601 Copenhagen V
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The contact details for all of the above companies are:

E-mail: **info@sbf.dk**

Tel.: **+45 33 93 52 00**

## 2 DESCRIPTION OF PROCESSING

### 2.1 Statutory whistleblower scheme under the Danish Whistleblower Act

This section describes how Sund & Bælt processes data about the person reported on ("**the person concerned**"), and the person submitting the report ("**the whistleblower**") in connection with reports to Sund & Bælt's whistleblower scheme via the statutory route.

This section applies to the processing of personal data in connection with reports concerning Sund & Bælt Holding A/S.

Purpose	Categories of personal data	Basis for processing	Recipients	Storage/retention
<b>#1</b> Handling and investigation of reports covered by Sund & Bælt's whistleblower scheme concerning: <ul style="list-style-type: none"> <li>The person reported on</li> </ul>	We may process the following categories of personal data pertaining to you:  <u>General personal data:</u> <ul style="list-style-type: none"> <li>Name, e-mail, phone-number</li> </ul>	We will process your personal data on the following basis: <ul style="list-style-type: none"> <li>Whistleblower Act, Section 22: Necessary for Sund &amp; Bælt to be able to process reports received as part of Sund &amp; Bælt's whistleblower</li> </ul>	We may share your personal data with: <ul style="list-style-type: none"> <li>Plesner Advokatpartnerselskab</li> <li>The police</li> </ul>	We will retain personal data for as long as necessary to meet the stated purpose. <ul style="list-style-type: none"> <li>The data will be retained for as long as the investigation is ongoing. The retention period will depend on the outcome of the investigation.</li> </ul>
<b>Sources</b>				

<p>We may collect information from the following sources:</p> <ul style="list-style-type: none"> <li>• Plesner Advokatpartnerselskab</li> <li>• Employees of Sund &amp; Bælt</li> <li>• Members of executive management and the Board of Directors</li> <li>• Volunteers</li> <li>• Paid and/or unpaid trainees</li> </ul>	<ul style="list-style-type: none"> <li>• Other information included in the report.</li> </ul> <p><u>Sensitive data</u>, including details of sexual matters, may be included in the processing.</p> <p><u>Details of actual or possible breaches of the law</u> may also be covered by the processing.</p>	<p>scheme set up in accordance with the Whistleblower Act, cf.</p> <ul style="list-style-type: none"> <li>- GDPR Art. 6(1)(c): necessary for compliance with a legal obligation to which Sund &amp; Bælt is subject under Section 9 of the Whistleblower Act</li> <li>- GDPR Art. 6(1)(e): necessary for the performance of a task carried out in the public interest</li> <li>- GDPR Art. 9(2)(g) The processing is necessary for reasons of substantial public interest in accordance with Section 9 of the Whistleblower Act</li> <li>- Danish Data Protection Act, Section 8(5), cf. Section 7(4), cf. GDPR Article 9(2)(g).</li> </ul>	<ul style="list-style-type: none"> <li>• Public authorities, such as the Financial Supervisory Authority, the Danish Data Protection Agency or relevant tax authorities</li> </ul>	<ul style="list-style-type: none"> <li>• Reports filed within the scheme will generally be deleted after 45 days, unless Sund &amp; Bælt has a legitimate reason to hold them for longer.</li> <li>• Reports that fall outside the scheme but do not appear to be groundless will be forwarded to Sund &amp; Bælt's HR Manager, where they will be dealt with in accordance with Sund &amp; Bælt's relevant policies and procedures.</li> <li>• Reports that prove to be groundless will be closed within the scheme immediately and deleted within 45 days after it was determined that the report could be considered groundless.</li> <li>• If a matter is reported to the police or another authority, the data will be retained for at least as long as the investigation by the police/other authority is ongoing.</li> <li>• Moreover, the data will be retained in accordance with Sund &amp; Bælt's deletion policy.</li> </ul>
<b>Purpose</b>	<b>Categories of personal data</b>	<b>Basis for processing</b>	<b>Recipients</b>	<b>Storage/retention</b>
<p><b>#2</b></p> <p>Handling and investigation of reports covered by Sund &amp; Bælt's whistleblower scheme concerning:</p> <ul style="list-style-type: none"> <li>• The whistleblower</li> </ul> <p>If there should be any suspicion of a knowingly false report, this purpose will also cover investigation of the person who submitted the report in such situations</p>	<p>We may process the following categories of personal data, provided that your report is not submitted anonymously</p> <p><u>General personal data:</u></p> <ul style="list-style-type: none"> <li>• Name, e-mail, phone-number</li> <li>• Content of your report</li> </ul> <p>We will not generally process sensitive data about you in handling the</p>	<p>We will process your personal data as described above on the following basis</p> <ul style="list-style-type: none"> <li>• Whistleblower Act, Section 22: Necessary for Sund &amp; Bælt to be able to process reports received as part of Sund &amp; Bælt's whistleblower scheme set up in accordance with the Whistleblower Act, cf.</li> <li>- GDPR Art. 6(1)(c): necessary for compliance with a legal obligation to which Sund &amp; Bælt</li> </ul>	<p>We may share your personal data with:</p> <ul style="list-style-type: none"> <li>• Plesner Advokatpartnerselskab</li> <li>• The police</li> <li>• Public authorities, such as the Financial Supervisory Authority, the Danish Data</li> </ul>	<p>We will retain personal data for as long as necessary to meet the stated purpose.</p> <ul style="list-style-type: none"> <li>• The data will be retained for as long as the investigation is ongoing. The retention period will depend on the outcome of the investigation.</li> <li>• Reports filed within the scheme will generally be deleted after 45 days, unless Sund &amp; Bælt has a legitimate reason to hold them for longer.</li> </ul>
<b>Sources</b>				

<p>We may collect information from the following sources:</p> <ul style="list-style-type: none"> <li>• Plesner Advokatpartnerselskab</li> <li>• You</li> </ul>	<p>report itself, unless you choose to provide such details about yourself.</p> <p>Details of actual or possible breaches of the law may however be covered by the processing if there is any suspicion that a knowingly false report has been submitted.</p>	<p>is subject under Section 9 of the Whistleblower Act</p> <ul style="list-style-type: none"> <li>- GDPR Art. 6(1)(e): necessary for the performance of a task carried out in the public interest</li> <li>- GDPR Art. 9(2)(g) The processing is necessary for reasons of substantial public interest in accordance with Section 9 of the Whistleblower Act</li> <li>- Danish Data Protection Act, Section 8(5), cf. Section 7(4), cf. GDPR Article 9(2)(g).</li> </ul>	<p>Protection Agency or relevant tax authorities</p>	<ul style="list-style-type: none"> <li>• Reports that fall outside the scheme but do not generally appear to be groundless, will be forwarded to Sund &amp; Bælt's HR Manager, where they will be dealt with in accordance with Sund &amp; Bælt's relevant policies and procedures.</li> <li>• Reports that prove to be groundless will be closed within the scheme immediately and deleted within 45 days after it was determined that the report could be considered groundless.</li> <li>• If a matter is reported to the police or another authority, the data will be retained for at least as long as the investigation by the police/other authority is ongoing.</li> <li>• Moreover, the data will be retained in accordance with Sund &amp; Bælt's deletion policy.</li> </ul>
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## 2.2 Voluntary whistleblower scheme

This document describes how Sund & Bælt processes personal data pertaining to persons submitting reports via the voluntary scheme, and persons reported on via the voluntary scheme.

This section applies to the processing of personal data in connection with reports concerning Sund & Bælt Partner A/S, Brobizz A/S, Brobizz Operatør A/S, A/S Femern Landanlæg, Femern Bælt A/S, A/S Storebæltsforbindelsen, A/S Øresundsforbindelsen, Havnetunellen A/S and Kattegatforbindelsen A/S.

Purpose	Categories of personal data	Basis for processing	Recipients	Storage/retention
<p><b>#1</b> Handling and investigation of reports covered by <b>the voluntary scheme</b> at Sund &amp; Bælt concerning:</p> <ul style="list-style-type: none"> <li>The person reported on</li> </ul>	<p>We may process the following categories of personal data, provided that your report is not submitted anonymously</p> <p><u>General personal data:</u></p> <ul style="list-style-type: none"> <li>Name, e-mail, phone-number</li> <li>Other information included in the report.</li> </ul>	<p>We will process your personal data on the following basis:</p> <ul style="list-style-type: none"> <li>GDPR, Article 6(1)(f): Necessary to the pursuit of Sund &amp; Bælt's legitimate interests in being able to investigate reports submitted via the whistleblower scheme</li> <li>GDPR, Article 9(2)(f): Necessary for legal claims to be established, asserted or defended</li> </ul>	<p>We may share your personal data with:</p> <ul style="list-style-type: none"> <li>Plesner Advokatpartnerselskab</li> <li>Sund &amp; Bælt Holding A/S</li> <li>The police</li> <li>Public authorities, such as the Financial Supervisory Authority, the Danish Data Protection Agency or relevant tax authorities</li> </ul>	<p>We will retain personal data for as long as necessary to meet the stated purpose.</p> <ul style="list-style-type: none"> <li>The data will be retained for as long as the investigation is ongoing. The retention period will depend on the outcome of the investigation.</li> <li>Reports filed within the scheme will generally be deleted after 45 days, unless Sund &amp; Bælt has a legitimate reason to hold them for longer.</li> <li>Reports that fall outside the scheme but do not appear to be groundless will be forwarded to Sund &amp; Bælt's HR Manager, where they will be dealt with in accordance with Sund &amp; Bælt's relevant policies and procedures.</li> <li>Reports that prove to be groundless will be closed within the scheme immediately and deleted within 45 days after it was determined that the report could be considered groundless.</li> <li>If a matter is reported to the police or another authority, the data will be retained for at least as long as the investigation by the police/other authority is ongoing.</li> <li>Moreover, the data will be retained in accordance with Sund &amp; Bælt's deletion policy.</li> </ul>
<p><b>Sources</b></p>	<p><u>Sensitive data</u>, including details of sexual matters, may be included in the processing.</p>			
<p>We may collect information from the following sources:</p> <ul style="list-style-type: none"> <li>Plesner Advokatpartnerselskab</li> <li>Employees of Sund &amp; Bælt</li> <li>Members of executive management and the Board of Directors</li> <li>Volunteers</li> <li>Paid and/or unpaid trainees</li> </ul>	<p><u>Details of actual or possible breaches of the law</u> may also be covered by the processing.</p>	<ul style="list-style-type: none"> <li>Danish Data Protection Act, Section 8 concerning details of offences and convictions</li> </ul>		
Purpose	Categories of personal data	Basis for processing	Recipients	Storage/retention

<p><b>#2</b> Handling and investigation of reports covered by <b>the voluntary scheme</b> at Sund &amp; Bælt concerning:</p> <ul style="list-style-type: none"> <li>• Persons who have submitted a report</li> </ul> <p>If there should be any suspicion of a knowingly false report, this purpose will also cover investigation of the person who submitted the report in such situations</p>	<p>We may process the following categories of personal data, provided that your report is not submitted anonymously</p> <p><u>General personal data:</u></p> <ul style="list-style-type: none"> <li>• Name, e-mail, phone-number</li> <li>• Content of your report</li> </ul> <p>We will not generally process sensitive data about you in handling the report itself, unless you choose to provide such details about yourself.</p>	<p>We will process your personal data on the following basis:</p> <ul style="list-style-type: none"> <li>• GDPR, Article 6(1)(f): Necessary to the pursuit of Sund &amp; Bælt's legitimate interests in being able to investigate reports submitted via the whistleblower scheme</li> <li>• GDPR, Article 9(2)(f): Necessary for legal claims to be established, asserted or defended</li> <li>• Danish Data Protection Act, Section 8 concerning details of offences and convictions</li> </ul>	<p>We may share your personal data with:</p> <ul style="list-style-type: none"> <li>• Plesner Advokatpartnerselskab</li> <li>• Sund &amp; Bælt Holding A/S</li> <li>• Auditors</li> <li>• The police</li> <li>• Public authorities, such as the Financial Supervisory Authority, the Danish Data Protection Agency or relevant tax authorities</li> </ul>	<p>We will retain personal data for as long as necessary to meet the stated purpose:</p> <ul style="list-style-type: none"> <li>• The data will be retained for as long as the investigation is ongoing. The retention period will depend on the outcome of the investigation.</li> <li>• Reports filed within the scheme will generally be deleted after 45 days, unless Sund &amp; Bælt has a legitimate reason to hold them for longer.</li> <li>• Reports that fall outside the scheme but do not generally appear to be groundless, will be forwarded to Sund &amp; Bælt's HR Manager, where they will be dealt with in accordance with Sund &amp; Bælt's relevant policies and procedures.</li> <li>• Reports that prove to be groundless will be closed within the scheme immediately and deleted within 45 days after it was determined that the report could be considered groundless.</li> <li>• If a matter is reported to the police or another authority, the data will be retained for at least as long as the investigation by the police/other authority is ongoing.</li> <li>• Moreover, the data will be retained in accordance with Sund &amp; Bælt's deletion policy.</li> </ul>
<b>Sources</b>				
<p>We may collect information from the following sources:</p> <ul style="list-style-type: none"> <li>• Plesner Advokatpartnerselskab</li> <li>• You</li> </ul>	<p>Details of actual or possible breaches of the law may however be covered by the processing if there is any suspicion that a knowingly false report has been submitted.</p>			

### 3 INFORMATION TO THE DATA SUBJECT AND CORRECTION

If anyone reports on you via the whistleblower scheme, you will be told as soon as possible after a preliminary investigation has been done and all relevant evidence obtained, and you will also be informed of:

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

As stated below in the section on your general rights, you have the right to view the report submitted about you. The rules laid down in the Whistleblower Act may however place restrictions on your right of access.

You also have the right to ask for any information in the report that you believe is incorrect, misleading or incomplete to be corrected. If your request for correction cannot be met, your comments will be added to the data.

#### **4 CONSEQUENCES OF THE PROCESSING**

Reporting to the whistleblower scheme and investigation of reports submitted to it may have serious consequences for the person reported on since reports concern actual or suspected breaches of the law, so the scheme as a whole is restricted by the special rules applicable to it.

Similarly, reports to the whistleblower scheme may have serious consequences for the person who submitted the report if this was knowingly false. Such cases could be subject to criminal sanctions.

#### **5 TRANSFERS TO COUNTRIES OUTSIDE THE EU/EEA**

Your personal data will not be transferred to countries outside the EU/EEA

#### **6 YOUR GENERAL RIGHTS**

You have the following rights:

- You have the right to request access to, rectification or deletion of your personal data.
- You also have the right to oppose and limit the processing of your personal data.
- You have the right to receive the personal data you have provided in a structured, commonly used and machine-readable format (data portability).
- You can always submit a complaint to a data protection supervisory authority, e.g. the Danish Data Protection Agency.

You also have the right to object to our processing of your personal data:

- If our processing of your personal data is based on Article 6(1)(e) (public interest or the exercise of official authority) or Article 6(1)(f) (balance of interests) (see above under basis for processing), you have the right to object to this processing at any time for reasons that might relate to your particular situation.

These rights may be subject to conditions or limitations. So it is not certain that you will have the right e.g. to have data about you deleted in any given case – this will depend on the specific circumstances associated with the processing operations.

You may exercise your rights by contacting the HR Manager.

## **7 IT POLICY**

For employees of Sund & Bælt, refer also to Sund & Bælt's IT policy, which contains information on Sund & Bælt's IT and e-mail policies.

## **8 RETENTION PERIOD**

If any disciplinary action is taken on the basis of the data collected via Sund & Bælt's whistleblower scheme, or there are other reasons why it is reasonable and necessary to retain the data about you, the data will be stored in your staff folder and deleted in accordance with Sund & Bælt's deletion policy.

## **9 QUESTIONS**

If you have any questions concerning this policy, you are welcome to contact the HR Manager.

*If any disciplinary action is taken on the basis of the data collected via Sund & Bælt's whistleblower scheme, or there are other reasons why it is reasonable and necessary to retain the data about you, the data will be stored in your staff folder and deleted in accordance with Sund & Bælt's deletion policy.*

*Last updated: March 2023*