

PRIVACY POLICY - EXTERNAL

Version 2.0, The 19th of October 2023

Whistleblower Partners ApS
Reg. No. 43615661
Kultorvet 11, 4th,
1175 Copenhagen C,
Denmark

1. WHAT DOES THE PRIVACY POLICY CONCERN?

Our Privacy Policy aims to inform you on how Whistleblower Partners collects your personal data. Your personal data is defined as all information relating to you as an identifiable person. The legal basis for this Privacy Policy is the requirements set out in the General Data Protection Regulation (GDPR)¹.

You can read more about how we collect personal data on the specific categories of persons on the following pages.

1. Who Are Data Controllers?

Whistleblower Partners are data controllers when you use our products, when you use our services, and when we receive your data from third parties, as we are determining the purpose of your personal data. We are also considered to be data controllers when we are delivering the Whistleblower Partners Screening Service and the Whistleblower Partners System in combination. However, when we only are delivering the Whistleblower Partners System, we are considered to be data processors.²



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This Privacy Policy is made on behalf of Whistleblower Partners, which consists of the following:

Whistleblower Partners ApS
Reg. No. 43615661
Kultorvet 11, 4th,
1175 Copenhagen C,
Denmark

Nordic Whistle ApS
Reg. No. 41915374
C / O Whistleblower Partners ApS

Whistlesoft ApS
Reg. No. 41842164
C / O Whistleblower Partners ApS

2. WITH WHAT PURPOSES DO WE COLLECT YOUR DATA?

The following section describes the purposes of our collection and processing of your personal data. The purposes are different depending on which categories of persons you belong to.

If we need to process your personal data for another purpose that goes beyond the purposes listed below, then we will contact you before to the data processing. However, if you are a person concerned in a report, you will not be contacted, due to the special confidential requirements in the Whistleblower Directive.³

1. Reporting Persons

You are a reporting person when you submit a report on a breach of the law through the Whistleblower Partners System as a part of the Whistleblower Partners Screening Service. When you submit a report we will collect personal data directly from you, and



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we might collect personal data from your employer's authorized staff member(s) if we need to elaborate on the initial basis of information given in the report. We collect your personal data for the following purposes;

- to receive reports in the Whistleblower Portal,
- to acknowledge receipt of the reports,
- to exchange information and give feedback on the reports,
- to investigate the content of the reports,
- to advise customers on the processing of the reports,
- to transmit the case to further processing,
- to keep a register of the reports.

2. **Persons Concerned in a Report**

If there has been referred to you, as a person to whom a breach of the law is attributed or you have been mentioned in a report, you are a person concerned in a report, and your personal data will be collected from the report. We might collect personal data from your employer's authorized staff member(s) if we need to elaborate on the initial basis of information given in the report. We collect your personal data for the following purposes:

- to receive reports in the Whistleblower Portal,
- to acknowledge receipt of the reports,
- to exchange information and give feedback on the reports,
- to investigate the content of the reports,
- to advise customers on the processing of the reports,
- to transmit the case to further processing,
- to keep a register of the reports.

3. **Customers**

When you purchase our products or services we will collect the personal data directly from you, through our contractors, and if you are an authorized staff member designated to receive reports, we might collect the personal data through senior employees in your firm. We collect your personal data for the following purposes;



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Communication

- to send non-promotional communication,
- to distribute direct marketing,
- to enable you to participate in surveys, campaigns, competitions, webinars, and events,
- to make data analysis, user analysis, and user segmentation.

Business

- to deliver our products and services,
- to process your payments,
- for the administration of our contracts,
- to develop our products further,
- for accounting purposes,
- to defend legal claims.

4. Contractors & Partners

When you perform work for us as one of our contractors, or we have a partnership agreement with you, we will collect personal data directly from you, and we might collect personal data from others in your firm, depending on the contact person we have. We collect your personal data for the following purposes;

- to send you non-promotional communication,
- to deliver our products and services,
- for the administration of our contracts,
- for accounting purposes,
- to defend legal claims.

5. Website Visitors & Newsletters Subscribers

When you visit our website one of our contractors will collect your personal data for us (tracking). We also use cookies on our website. When you via the website ask to book a demonstration, to be contacted, and subscribe to our newsletters, we collect personal data directly from you. Therefore, we collect your personal data for the following purposes;

- to create a booking of a demonstration,
- to send you non-promotional communication,
- to store cookies on your web browsers,
- to distribute direct marketing,



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- to enable you to participate in surveys, campaigns, competitions, webinars, and events,
- to make data analysis, user analysis, and user segmentation (profiling),
- to register your visit.

When you visit our website, and our contractors collect your personal data, you are subject to profiling. The contractors provide us with your personal data, so we can segment the website's users. That allows us to provide you with more specific marketing based on your preferences.

You can see more about our Cookie Policy on our website.

6. Social Media Subscribers

When you interact with us via our social media accounts, we will collect personal data directly from you. Furthermore, the social media platforms we use make general statistics available to page owners about the subscribers. We might use your personal data when you have interacted with our social media accounts for the following purposes:

- to send you non-promotional communication,
- to distribute direct marketing,
- to share content on our social media accounts.

However, when you use the social media platforms where we are available, it is the platforms who are data processors, and therefore responsible for your personal data.

LinkedIn Ireland UnLtd., Wilton Plaza, Dublin, Ireland – [LinkedIn Privacy Policy](#)
Meta Platforms Ireland Ltd., 4 Grand Canal Square, Dublin, Ireland – [Facebook Privacy Policy](#)

7. Prospects

When our contractors forward your personal data to us, and we contact you with the aim of sales, you are considered to be a prospect. We might use your personal data for the following purposes:

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- to distribute direct marketing,
- to record phone calls for future education and training of employees,
- to register the communication.

3. WHICH CATEGORIES OF PERSONAL DATA DO WE COLLECT?

We collect different types of personal data, which depends on which categories of persons you belong to. There are three categories of personal data, general personal data, special categories of personal data, and personal data on criminal convictions and offenses. The following sections give you information about which types of personal data we might collect about you.

As a reporting person or a person concerned in a report, the categories of personal data collected depend on the content of the report. Therefore, the categories of personal data related to the content of the reports listed below are based on assumptions as to what a report can contain.

As a reporting person, you can choose to submit the report as an anonym, and if you do so, we can only identify you with an identification number, besides what you disclose in the report.



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1. Reporting Persons & Persons Concerned in a Report

General Personal Data

Profile Data

- First and last name,
- Address,
- Tel. No.,
- E-mail address,
- Civil Reg. No.,
- Birth date.

Private Data

- Housing,
- Cars,
- Family relationships,
- Children,
- Social relationships,
- Social problems.

Technical Data

- Technical preferences,
- Logins,
- Identification numbers,
- Usernames,
- Social media accounts,
- Pictures,
- Languages.

Employment Data

- Employment,
- Absence,
- Education,
- Examinations,

Financial Data

- Economy,
- Tax,
- Wage,
- Bank information.

Special Categories of Personal Data

- | | | |
|---|--|---|
| <ul style="list-style-type: none">• Racial origin,• Ethnic origin• Political opinions,• Religious beliefs, | <ul style="list-style-type: none">• Philosophical beliefs,• Trade union membership,• Genetics,• Biometrics, | <ul style="list-style-type: none">• Health,• Sex life,• Sexual orientation. |
|---|--|---|

Personal Data on Criminal Convictions & Offenses

- Criminal convictions,
- Criminal offenses.



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2. Customers, Contractors & Partners

General Personal Data

Profile Data

- First and last name,
- Tel. No.,
- E-mail address.

Employment Data

- Employment,
- Absence.

Financial Data

- Bank information.

Technical Data

- Technical preferences,
- Logins,
- Identification numbers,
- Usernames.

3. Website Visitors, Newsletters Subscribers, Social Media Subscribers & Prospects

General Personal Data

Profile Data

- First and last name,
- Tel. No.,
- E-mail address.

Employment Data

- Employment.

Technical Data

- IP-address,
- Location,
- Technical preferences,
- Identification numbers,
- Usernames,
- Social media accounts,

- Pictures,
- Devices,
- Browsers,
- Settings,
- Languages.



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4. THIS IS THE LEGAL BASIS FOR OUR COLLECTION OF PERSONAL DATA

It is a general rule that the collection of personal data must have a lawful basis. The following section gives you insight into the legal basis of the collection of your personal data.

1. Reporting Persons & Persons Concerned in a Report

General Personal Data

When we collect your general personal data the legal basis for the collection is our legal obligation in Member State law and the performance of a task carried out in the public interest.

✓ GDPR Article 6 (1)(c) and (e)

Special Categories of Data

When we collect special categories of personal data the legal basis for the collection is that processing is necessary for reasons of substantial public interest on the basis of Member State law.

✓ GDPR Article 9 (2)(g)

Data on Criminal Offenses

When we collect personal data on criminal offenses the legal basis for the collection is the authorization given in Member State law.

✓ GDPR Article 10

2. Customers, Contractors & Partners

General Personal Data

When we collect your general personal data the legal basis for the collection is the conclusion of a contract and the subsequent performance of the contract.

✓ GDPR Article 6 (1)(b)

3. Website Visitors, Newsletters Subscribers, Social Media Subscribers & Prospects

General Personal Data

When we collect your general personal data in relation to your subscription to our newsletters, the recording of phone conversations, and the storage of cookies, the legal basis for the collection is based on your consent.

When we collect your personal data in relation to your visit to our website, sales contact, and the storage of critical cookies the legal basis for the collection / processing is our legitimate interest.

✓ GDPR Article 6 (1)(a)

✓ GDPR Article 6 (1)(f)

What Are the Legitimate Interests?

When we process your personal data with the purposes of direct marketing after personal data provided by our contractors, our legitimate interests consist of providing you with relevant marketing material that provide you opportunities to secure compliance with relevant legislation with our products and services. When we collect your personal data with the purpose of storage of cookies, our legitimate interests are to ensure the functioning of the website.

5. WHO IS YOUR DATA BEING SHARED WITH?

We are obligated to inform you with whom we share your personal data. In the following section, you can see who we share your personal data with, and if we share your personal data with parties outside of the European Union (EU) / Economic Area (EEA). There are special rules, if that is the case, which you also can read more about at the end of the following section.

Reporting Persons

- Your identity and other information from which your identity can be directly or indirectly deduced will only be shared with your employer's authorized staff member(s) designated to receive reports.
- Should we need to disclose your identity or other information from which your identity can be directly or indirectly deduced to other persons than your employer's authorized staff member(s) designated to receive reports, then we will inform you prior to sharing, unless such information would jeopardize the related investigation.

- Information from which your identity cannot be directly or indirectly deduced might be shared with the management of your firm and our regional law partners.

- ✓ Whistleblower Directive Article 16 (1-3)
- ✓ No transfers outside of the European Union (EU) / Economic Area (EEA)

Persons Concerned in a Report

- Whistleblower Partners might share your personal data with the authorized staff member(s) designated to receive reports in your firm, the management of your firm, our regional law partners, and public authorities.

- ✓ GDPR Article 6 (1)(c) and (e), Article 9(2)(g), and Article 10
- ✓ No transfers outside of the European Union (EU) / Economic Area (EEA)

Customers, Contractors & Partners

- Whistleblower Partners might share your personal data with our contractors in the areas of business administration, accounting, and marketing.

- ✓ GDPR Article 6 (1)(b)
- ✓ No transfers outside of the European Union (EU) / Economic Area (EEA)

Website Visitors, Newsletters Subscribers, Social Media Subscribers & Prospects

- Whistleblower Partners might share your personal data with our contractors in the area of business administration and marketing.

- ✓ GDPR Article 6 (1)(a) and (f)

Personal data collected on website visitors, newsletters subscribers, and prospects might be shared with our contractors outside of the European Union (EU) / Economic Area (EEA). The contractors in question are based in the United Kingdom and the United States of America. The legal basis of the transfers to the United Kingdom is the adequate decision of the Commission.⁴ The legal basis of the transfers to our contractor in the United States of America is the standard data protection clauses adopted in the data processing agreement.



6. HOW LONG IS YOUR DATA STORED?

As a general rule, personal data can be stored until it is not relevant for the purposes for which it is collected. Depending on which categories of persons you belong to, you can see for how long we retain your personal data in this section.

Reporting Persons & Persons Concerned in a Report

- We retain your general personal data, special categories of personal data, or data on criminal offenses for a maximum of 10 (ten) years. The retention period is based on the statute of limitations on economic and property crimes in the criminal acts of Member States.
- If we have transferred the report to the public authorities for further investigation your personal data will be deleted.
- If the report is unfounded your personal data will be deleted.

Customers, Contractors & Partners

- We retain your general personal data for a period of 3 (three) years after the termination of a contract. The retention periods are based on the statute of limitations on payment claims and accounting rules in the laws of Member States.
- We retain financial data for a period of 5 (five) years after termination of a contract.

Website Visitors, Newsletters Subscribers, Social Media Subscribers & Prospects

- We retain your general personal data in relation to website visitors for a period of 12 (twelve) months after you visit our website. The retention period is based on the data retention policies of our contractors.
- We retain your general personal data in relation to the storage of



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cookies depending on the data retention policies of the contractors.

- We retain newsletters subscribers' and prospects' personal data until it is not relevant for the purposes for which it is collected. We will retain information that you declined direct marketing so that you will not be exposed to direct marketing again.

Regardless of the data retention policies mentioned above, we shall retain your personal data for an extensive period if we are required to do so on the grounds of EU law or the law of a Member State.

7. YOUR RIGHTS & HOW TO EXERCISE THEM

You have rights related to our processing of your personal data that you can choose to exercise at all times. Your rights consist of:

- **The right to withdraw your consent.** You can always withdraw the consent you have given us to collect or share your personal data.
- **The right to access.** You have the right to access the personal data that we have about you, and our processing of your personal data.
- **The right to rectification.** You can get your personal data rectified if the personal data that we have about you is inaccurate.
- **The right to erasure.** You can request that we delete your personal data.

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- **The right to restriction of processing.** You can request that our processing of your personal data be restricted. That means that we can (only) store your personal data.
- **The right to data portability.** You can ask to receive your personal data in a structured, commonly used, and machine-readable format, and to transmit the data to third parties.

If you are a person concerned in a report, your rights might be limited due to the special confidential requirements in the Whistleblower Directive.

If you wish to exercise the above-mentioned rights, you shall contact our Data Team (privacy@whistleblowerpartners.com). The Data Team will then return to you without undue delay.

8. IF YOU HAVE QUESTIONS OR WANT TO COMPLAIN

If you have questions regarding our Privacy Policy, please contact our Data Team (privacy@whistleblowerpartners.com) or our DPO Michael Erlitz (michael.erlitz@whistleblowerpartners.com). Our Data Team will then return to you without undue delay.

You can also submit a complaint to the Danish Supervisory Authority, which you can read more about on their website (<https://www.datatilsynet.dk/borger/klage/saadan-klager-du>).

The Danish Data Supervisory Authority
Carl Jacobsens Vej 35, 2500 Valby, Denmark