PRIVACY POLICY

Information about our processing of your personal data etc. in connection with the whistleblower system

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Table of contents

1 We are the data controller – how do you contact us? 3

2 The purposes and legal basis for the processing of your personal data 3

3 Categories of personal data 4

4 Recipients or categories of recipients 4

5 Transfer to recipients in third countries, including international organizations. 5

6 Where your personal information comes from 5

7 Storage of your personal data 5

8 Automatic decisions, including profiling 5

9 Your rights 5

10 Complaint to the Danish Data Protection Agency (Datatilsynet) 6

1 We are the data controller – how do you contact us?

Clipper Bulk, Sundkrogsgade 19, 2100 København Ø, CVR: 21289086, E-mail: , Phone: is the data controller for the processing of the personal data that you choose to enter in connection with reporting to the whistleblower system.

1.1 However, this does not mean that we have access to the personal data in connection with the processing of reports or the following, but simply that we are data responsible for these.

2 The purposes and legal basis for the processing of your personal data

2.1 We process your personal data for the following purposes:

2.1.1 To process reports to the whistleblower system and communicate with you in this regard.

2.2 If you make an anonymous report to the whistleblower system, we will not process your personal information. All inquiries about the whistleblower system are handled confidentially by Lund Elmer Sandager law firm.

2.3 The legal basis for our processing of your personal data may be based on:

2.3.1 Legitimate interests as set out in with Article 6 (1), point f of the General Data Protection Regulation (GDPR). The legitimate interests that justify the processing are our interest in being able to discover, hinder and prevent illegal or unethical behaviour. However, this does not apply if the data controller is a public authority.

2.3.2 The processing is necessary for a legal claim to be established, pursued, or defended, see Article 9 (2), point f of the GDPR or that the processing is necessary for reasons of significant public interest on the basis of EU law, see Article 9 (2), point g of the General Data Protection Regulation (GDPR) with regards to special categories of personal data.

2.3.3 Our legal obligation to establish a whistleblower scheme and process received reports, see the Whistleblower Directive and the act on protection of whisteblowers, see Article 6 (1), point c of the General Data Protection Act (GDPR).

2.3.4 That the processing is necessary for the purpose of carrying out a task in the interest of society or which falls under the exercise of public authority which the data controller has been imposed with, see Article 6 (1), point e of the General Data Protection Regulation (GDPR).

2.3.5 If information on criminal matters is processed in connection with a whistleblower case, this is done on the basis of Article 8 (1-2) of the General Data Protection Act with regards to the processing of the information by public authorities and Article 8 (3 4) with regards to companies' processing of personal information.

2.3.6 If information on CPR numbers is processed in connection with a whistleblower case, this is done on the basis of Article 11 (1) of the General Data Protection Act with regards to the processing of the information by public authorities and Article 11 (2) no. 1 and 4 with regards to companies' processing of personal information.

2.4 The legal basis for the processing of personal data in the individual whistleblower case may vary from case to case. The legal basis for the processing of any personal data is therefore assessed and documented on an ongoing basis in each individual case.

3 Categories of personal data

3.1 We process the following categories of personal data about you as reporter:

3.1.1 General personal data such as name and contact information.

3.1.2 Information you have otherwise chosen to pass on to us in connection with your report. This may be both general personal data as well as special categories of personal data.

3.2 If you have chosen to make an anonymous report to the whistleblower system, we cannot identify you and therefore do not process your personal data. Please be aware that the report you make may have a character that makes it possible to identify you based on the nature of the relationship even if you have indicated to be anonymous.

3.3 We process the following categories of personal data about you that are included in the investigation of a case:

3.3.1 General personal data such as name and contact information.

3.3.2 Other information that has been shared in connection with the report or that has emerged in connection with the investigation of the case. This may both be general personal data as well as special categories of personal data.

4 Recipients or categories of recipients

4.1 We pass on your personal information to the following recipients:

4.1.1 Authorities or public instances if necessary in connection with legal consequences, or if Lund Elmer Sandager or we are required to do so by law.

4.1.2 Lund Elmer Sandager as administrator of the whistleblower system. Lund Elmer Sandager is the independent data controller in relation to the processing of personal information in the whistleblower system.

5 Transfer to recipients in third countries, including international organizations.

5.1 We do not transfer your personal data to recipients outside the EU and the EEA.

6 Where your personal information comes from

6.1 We only process personal data about you as a whistleblower which you have provided in connection with a report and its processing.

6.2 If you are part of a pending whistleblower case, we may process personal data about you that we have received from employees or public authorities.

7 Storage of your personal data

7.1 We store your personal information in connection with the case processing and until 60 days after the case processing is completed. Data controllers who are public authorities are subject to a record obligation which means that information that is part of the public authority's case processing is logged and stored in accordance with the relevant regulations and for the period of time as set out in regulation. Information is deleted in this case when it is no longer necessary - the assessment of this depends on, among other things, the nature of the information and the context in which they form part.

7.2 In some cases, it may be necessary to keep the personal data for more than 60 days from the end of the case. This will, for example, be in connection with legal consequences of the report. The assessment of the cases is made individually.

8 Automatic decisions, including profiling

8.1 We do not use automatic decisions or profiling in connection with the processing of whistleblower cases. You will not be subject to profiling and all decisions will be made by natural persons based on specific assessments.

9 Your rights

9.1 Under the General Data Protection Regulation, you have several rights in relation to our processing of information about you. If you want to make use of your rights, please contact us.

9.2 Right to access information (right to access)

9.2.1 You have the right to access the information we process about you, as well as several additional information.

9.3 Right to rectification (correction)

9.3.1 You have the right to have incorrect information about yourself corrected.

9.4 Right to deletion

9.4.1 In special cases, you have the right to have information about you deleted before the time of our general deletion occurs.

9.5 Right to limit processing

9.5.1 In some specific cases, you have the right to have the processing of your personal data restricted. If you have the right to have the processing limited, we are only entitled to process the information – apart from storage – with your consent or if legal claims are to be established, pursued, or defended, or to protect a person or important societal interests going forward.

9.6 Right to objection

9.6.1 In some cases, you have the right to object to our processing of your personal data.

9.7 You may read more about your rights in the Danish Data Protection Agency's guide to a data subjects' right, which you will find at www.datatilsynet.dk

10 Complaint to the Danish Data Protection Agency (Datatilsynet)

10.1 You have the right to file a complaint with the Danish Data Protection Agency if you are dissatisfied with how we process your personal data. You will find Danish Data Protection Agency's contact information at www.datatilsynet.dk