

PRIVACY POLICY

PLESNER ADVOKATPARTNERSELSKAB

This Privacy Policy explains how Plesner Advokatpartnerselskab ("Plesner", "we" or "us") processes your personal data in connection with reports through Plesner Whistleblower Portal.

Below is a description of the processing of personal data that takes place and the rights you have if you are reported through Plesner Whistleblower Portal, as well as your rights if you use Plesner Whistleblower Portal to file a report on another person.

1 DATA CONTROLLER

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

Plesner Advokatpartnerselskab

CVR.no.: 38 47 79 35

Amerika Plads 37

DK-2100 København Ø

Email: Plesner@plesner.com

Telephone: +45 3312 1133

Contact:

If you have any questions regarding our processing of personal data, you are very welcome to contact us at plesner@plesner.com or by telephone: +45 3312 1133.

2 DESCRIPTION OF THE PROCESSING

Purpose	Categories of Personal Data	Sources	Legal Basis for the Processing	Recipients	Data Retention
<p>#1 Handling and investigation of reports submitted through Plesner Whistleblower Portal regarding:</p> <ul style="list-style-type: none"> The person who is reported. 	<p>We may process the following categories of personal data about you:</p> <p><u>Ordinary personal data:</u></p> <ul style="list-style-type: none"> Name, email, telephone number. Other data included in the report. <p><u>Special categories of personal data (sensitive personal data):</u></p> <ul style="list-style-type: none"> As a rule, we do not process sensitive personal data, but sensitive personal data may be processed to the extent such data appear from the report. <p><u>Personal data relating to offences or possible offences:</u></p> <ul style="list-style-type: none"> We may process personal data relating to offences or possible offences to the extent such personal data appear from the report. 	<p>We may collect personal data from the following sources:</p> <ul style="list-style-type: none"> Employees. Other people who can use Plesner Whistleblower Portal. 	<p>We process your personal data on the following legal basis:</p> <ul style="list-style-type: none"> GDPR, Article 6.1.f (necessary for the purposes of the legitimate interests pursued by Plesner to investigate reports submitted through Plesner Whistleblower Portal). GDPR, Article 9.2.f (necessary for the establishment, exercise, or defence of legal claims). Section 8 of the Danish Data Protection Act regarding information about criminal offenses and convictions. 	<p>We may share your personal data with:</p> <ul style="list-style-type: none"> Your employer. Suppliers, including IT-suppliers. 	<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 personal data are retained for as long as the investigation is in progress. The retention period depends on the outcome of the investigation. As a rule, reports submitted through Plesner Whistleblower Portal are deleted 45 days after the termination of the processing.

Purpose	Categories of Personal Data	Sources	Legal Basis for the Processing	Recipients	Data Retention
<p>#2 Handling and investigation of reports submitted through Plesner Whistleblower Portal regarding:</p> <ul style="list-style-type: none"> The person submitting the report. 	<p>We may process the following categories of personal data about you (provided that your report is not anonymous):</p> <p><u>Ordinary personal data:</u></p> <ul style="list-style-type: none"> Name, email, telephone number. The content of your report. <p><u>Special categories of personal data (sensitive personal data):</u></p> <ul style="list-style-type: none"> As a rule, we do not process sensitive personal data about you, unless you choose to provide such personal data about yourself in the report. 	<p>We may collect personal data from the following sources:</p> <ul style="list-style-type: none"> Directly from you. 	<p>We process your personal data on the following legal basis:</p> <ul style="list-style-type: none"> GDPR, Article 6.1.f (necessary for the purposes of the legitimate interests pursued by Plesner to investigate reports submitted through Plesner Whistleblower Portal). GDPR, Article 9.2.f (necessary for the establishment, exercise or defence of legal claims). 	<p>We may share your personal data with:</p> <ul style="list-style-type: none"> Your employer (provided that your report is not anonymous). Suppliers, including IT-suppliers. 	<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 personal data is retained for as long as the investigation is in progress. The retention period depends on the outcome of the investigation. As a rule, reports submitted through Plesner Whistleblower Portal are deleted 45 days after the termination of the processing.

3 TRANSFERS TO COUNTRIES OUTSIDE THE EU/EEA

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

4 YOUR RIGHTS

You have the following rights:

- You have the right to request access to and rectification or deletion of your personal data.
- You also have the right to have the processing of your personal data restricted.
- If the processing of your personal data is based on your consent, you have the right to withdraw your consent at any time. Your withdrawal will not affect the lawfulness of the processing carried out before you withdrew your consent. You may withdraw your consent and make use of your rights as mentioned below.
- You have the right to receive the personal data submitted by yourself, in a structured, commonly used and machine-readable format (data portability).
- You may always lodge a complaint with a data protection supervisory authority, e.g. The Danish Data Protection Agency.

Furthermore, you are entitled to raise an objection to our processing of your personal data under the following circumstances:

- If our processing of your personal data is based on GDPR, Article 6.1.e (public interest or exercise of official authority) or GDPR, Article 6.1.f (balancing of interests), see above under legal basis for the processing, you are, at any time, entitled to raise an objection to such processing for reasons related to your particular situation.

There may be conditions or limitations relating to these rights. Therefore, in a specific case, you may not, for instance, have the right to obtain access to the personal data about you or require such data to be deleted - this depends on the specific circumstances of the processing activities.

You can make use of your rights by contacting Plesner at plesner@plesner.com or by telephone: +45 3312 1133.

Last updated: Juni 2021