

**PRIVACY POLICY**

# Whistleblowing Policy



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## Privacy notice – Whistleblowing policy

Information about our processing of your personal data

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

Unifeeder A/S is the data controller of the personal data you submit when you file a report via the Whistleblowing channels. You will find our contact information below:

Unifeeder A/S | Tangen 6 | 8200 Aarhus N | Denmark

Central Business Register (CVR) no.: 11 81 05 43

Telephone: Tel.: +45 88 83 00 00

E-mail: [info@unifeeder.com](mailto:info@unifeeder.com)

### Contact information of the Compliance Officer

If you have any questions about our processing of your personal data, you are always welcome to contact our Compliance Officer.

You can contact our Compliance Officer in the following ways:

- By e-mail: [compliance@unifeeder.com](mailto:compliance@unifeeder.com)
- On the telephone: + 45 88 83 00 16
- By letter: Unifeeder A/S | Tangen 6 | 8200 Aarhus N | Denmark  
for the attention of "Compliance Officer"

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

### We process your personal data for the following purposes:

Any personal data collected via the whistleblowing system will be processed for the purpose of administering and investigating allegations raised, and dealing with discovered misconduct, as described in Unifeeder's Whistleblowing Policy. The Whistleblowing Unit takes both technical and organizational measures to protect the personal data processed. Using Unifeeder's whistleblowing channels, the personal data collected will be processed only by authorized individuals in Unifeeder who are involved in the investigation. In this context, personal data may be transferred to a department within the legal entity of Unifeeder.

Transfers can also be made when it's necessary to comply with a legal obligation or to establish, exercise or defend a legal claim. As an exception other information may also be transferred to other legal entities, if it is necessary to follow up on a report or to counter violations. As an example, this can be the case where it's necessary to clarify whether an incident has actually taken place, or when it's necessary to use external counseling on how to handle a situation.

## **We process the following categories of personal data:**

Whistleblowing reports will include information on the identity of reported persons as well as information on the reported matter. Furthermore, reports may include information on the identity of the person filing the report, as well as information relating to other persons referred to in the report.

During investigations, we may process information about additional persons (e.g. persons questioned as part of the investigation and other persons identified during the investigation to be involved in the reported matter). Information about these persons will include information on their identity, their role in the specific matter and any information these persons may have provided to the investigators.

## **The legal basis for our processing of personal data appears from:**

For reports concerning legal entities established in Denmark, the legal basis is Regulation (EU) 2016/679 ("GDPR") article 6(1)(c), cf. The section 22 of the Danish Whistleblower Act.

For reports concerning legal entities established in Germany, the legal basis is Regulation (EU) 2016/679 ("GDPR") article 6(1)(c), cf. The section 10 of the German Whistleblower Protection Act.

For reports concerning legal entities established in Poland, the legal basis is Regulation (EU) 2016/679 ("GDPR") article 6(1)(c), cf. the Polish Whistleblower Protection Act.

For reports concerning legal entities established in Cyprus, the legal basis is Regulation (EU) 2016/679 ("GDPR") article 6(1)(c), cf. the Cyprus Whistleblower Protection Act.

For reports concerning legal entities established in Holland, the legal basis is Regulation (EU) 2016/679 ("GDPR") article 6(1)(c), cf. the Dutch Whistleblower Protection Act.

## **Recipients of your personal data**

Personal data may be transferred to the police or other law enforcement authorities, forensic companies, or independent auditors. To the extent deemed necessary, it may also be transferred to Unifeeder's affiliates, owners, or joint venture partners.

## **Transfers of personal data to countries outside EU/EEA**

In connection with the processing, the personal data may be transferred to countries outside the EU/EEA (Dubai & India). We ensure that your rights are protected, and that the level of protection is maintained in connection with these data transfers, for example through standard contracts approved by the European Commission cf. Article 46(3), of the GDPR. For a copy of these standard contracts, please contact us (see 'We are the Data Controller – how do you contact us?' above).

## **Storage of your personal data**

The personal data which is compiled and processed will not be retained longer than is necessary. Complaints, reports, and information regarding misconduct which have been investigated will be deleted when the investigation has been concluded or, if the investigation results in action being taken against the individual who has been reported, when the information is no longer needed for the purpose of carrying out an investigation and acting up to a maximum of 18 months. If it is decided that no investigation will be carried out and it is an obvious groundless accusation, the information will be deleted immediately after such a decision has been made. If the report or accusation is not obvious groundless but does not meet the requirements of seriousness, the information will be stored for a maximum of six months due to the legal requirement and purpose of being able to link similar reports with earlier ones.

## **Your rights**

Under the General Data Protection Regulation, you have a number of rights in relation to our processing of information about you.

If you want to exercise your rights, you must contact us.

### **Right to see information (right of access)**

You have a right to gain access to the information that we process about you and some further information.

### **Right to rectification (correction)**

You have a right to have rectified incorrect information about you.

### **Right to erasure**

In very special cases, you have the right to have erased information about you before the time of our ordinary general erasure.

### **Right to restriction of processing**

In certain cases, you have a right to have restricted the processing of your personal data. If you have a right to have the processing restricted, in the future we may only process the information – except for storage – with your consent or for the purpose of determining, relying on or defending a legal claim or to protect a person or vital public interests. In that connection it is noted that archiving purposes are considered vital public interests.

### **Right to objections**

In certain cases, you have a right to object to our otherwise lawful processing of your personal data.

Please note that certain conditions and restrictions apply for the different rights.

You can read more about your rights in the Danish Data Protection Agency's guidelines on the rights of data subjects.

## History

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Version	Date	Author(s)	Change Description
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0.2	24-Aug-2021	Group CLO	
0.3	6-June-2022	Group CLO	
0.4	28-June-2024	Emil Maarup	Clarifications and new template
0.5	10-May-2025	Emil Maarup	Updated legal basis for processing personal data according to new national legislations and intra-group agreement for transfers outside EEA. Updated storage requirements according to new legislation and case law.

### Reviewers:

Version	Date	Reviewer(s)	Title	Remark
0.1	1-Feb-2017	Mie Letager Kjeldsen	Group CLO	Reviewed
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0.3	6-June-2022	Mie Letager Kjeldsen	Group CLO	Updated according to new legislation
0.3	6-June-2022	Consultant		Updated according to new legislation
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0.5	10-May-2025	Mie Letager Kjeldsen	CLO	Updated legal basis for processing personal data according to new national legislations and intra-group agreement for transfers outside EEA. Updated storage requirements according to legislation.

**Approvers:**

Version	Date	Approver(s)	Title	Remark
0.1	1-Feb-2017	Mie Letager Kjeldsen	Group CLO	Approved
0.1	1-Feb-2017	Board of Unifeeder A/S		Approved
0.2	24-Aug-2021	Mie Letager Kjeldsen Jesper Kristensen	Group CLO Group CEO	Approved
0.3	6-June-2022	Mie Letager Kjeldsen Jesper Kristensen	Group CLO Group CEO	Approved
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0.5	10-May-2025	Mie Letager Kjeldsen Martin Gaard Christiansen	CLO CEO	Approved

