

Personal data policy - whistle-blower scheme

Persons involved in the whistle-blower scheme at JPS Marselis ApS

As the data controller, the protection of data is something we take very seriously. We protect the personal data that we process and ensure that we comply with data protection regulations.

We give the data subjects (the persons whose information we process), information about our data processing and about the data subjects' rights.

In this personal data policy, we describe our processing of personal data in connection with our whistle-blower scheme.

Who we are and how you can contact us

The data controller company and its contact details:

JPS Marselis ApS, Thyrasgade 4, 8260 Viby J, Denmark, Central Business Registration (CVR) no. 38 11 01 36

Tel.: +45 60 65 84 98 (the group's legal representatives)

E-mail: sim@jpsclemens.dk (the group's legal representatives)

Website: www.jpsmarselis.com

Contact regarding data protection:

If you have any questions about our processing of your information, then you are welcome to contact the group's legal representatives. The group's legal representatives' contact details are stated above.

Our processing of personal data

Categories of personal data

The personal data about you that we process may include:

Information about the persons the report has been made about

The reports that are submitted to the JPS Marselis Group via the whistle-blower scheme may deal with employees in the JPS Marselis Group and other persons who have an association with the JPS Marselis Group. When we receive a report, we process the following type of personal data:

- Ordinary personal data, including:
 - Identity information
 - Information about the matter that is being reported on, including possible criminal offences
 - Description of the matter's nature and development
- Information about persons who are named in the reports, for example, persons exposed to the undesirable conduct of the persons who are being reported.

Information about the persons who make the report

Persons who make the report can choose to be anonymous. If you make a report and choose not to be anonymous, we process the following types of personal data about you:

- Ordinary personal data, including:
 - Identity information
 - Your report

Purpose and legal grounds

Our data processing has the following purpose:

- To establish a whistle-blower scheme in the JPS Marselis Group that can be used for the reporting of potentially criminal offences and/or irregularities of significant importance to the group. The whistle-blower scheme shall allow in-house and external persons the ability to report such matters to the relevant persons in the company, confidentially and anonymously.

Legal grounds for processing of personal data:

- The legal grounds allowing for the processing of information relating to criminal offences is given by the General Data Protection Regulation, article 10, cf. article 6, paragraph 1, cf. data protection law section 8, paragraph 3 (2) on whether the processing can take place if it is necessary for the handling of a legitimate interest and this interest clearly overrides the interest of the data subject.
- The legal grounds for our collecting and registering of other personal data is given by the data protection law, article 6, paragraph 1, cf. the legitimate interest rule in the General Data Protection Regulation, section 6, paragraph 1 (f). The legitimate interest which makes the processing necessary is in regard to the correct processing of personal data that is received via the JPS Marselis Group's whistle-blower scheme.
- The conveying of information about you will only occur in accordance with the processing rules in the General Data Protection Regulation and in accordance with Danish legislation. We will always assess whether the disclosure of information requires your express consent or whether the disclosure of information may take place on the basis of other legal grounds.
- In certain cases, we may share your personal data with recipients outside of the EC/EEA. This happens when we use data processors outside of the EC/EEA. All data transferred in this way will be transferred in accordance with the General Data Protection Regulation, including by using the EU Commission's standard contracts.

Categories of recipients

We disclose or make available personal data to the following categories of recipients:

- The subsidiary that the reported person is employed in or associated with, for the purpose of investigating the report.
- External solicitors, accountants, and other consultants in connection with the investigation.
- Police authorities and other public authorities.
- Our data processors on the basis of data processor contracts.

Deletion

We delete your personal data when storing it is no longer necessary.

If matters are reported to the police or other relevant authorities, the information is deleted immediately after the case has been closed by the relevant authorities unless we have a legitimate interest in storing the information for a longer period of time.

If based on the collected information, a contractual, disciplinary, or other sanction is carried out on the reported employee or if there is an objective reason for storing the information about the employee, the information will be stored in the person in question's personnel file.

After the termination of employment, the information about an employee may be stored for up to five years after the year of termination.

Your rights

In accordance with the general data protection regulation, you have a series of rights in relation to our processing of information about you.

You can exercise your rights at any time by contacting us. Our contact details are stated at the top of this personal data policy.

If you wish to have access, correct, or delete information about you or object to our processing of your personal data, we will determine whether this is possible and answer your enquiry as quickly as possible, at the latest one month after we have received your enquiry.

Your rights

- You have the right to request access, correction or erasure of your personal data that we process. If you request us to do it, we will delete the personal data without unnecessary delay unless we can continue processing the data by another legal basis.
- You are entitled to object to the processing of your personal data and to restrict the processing of your personal data.
- If the processing of your personal data is based on your consent, you have the right to withdraw your consent at any time. The withdrawal of your consent does not affect the legality of the processing that has taken place prior to the withdrawal of your consent.
- You have the right to have the personal data that you have personally provided to us, returned to you in a structured, commonly used, and machine-readable format (data portability).

There may be legally set restrictions or limitations in relation to these rights.

Your rights do not apply in cases where your interest in exercising your rights should deviate from the decisive consideration of private or public interests. The reported person does not have the right to receive information about the identity of a person who in good faith made the report or other actual information about her/him, unless otherwise clearly expressed by legislation.

If you are dissatisfied with our answer or if you are dissatisfied with the way your personal data has been processed, you can submit a complaint to the Danish Data Protection Agency.

To obtain the contact information of the Danish Data Protection Agency, go to www.datatilsynet.dk.