

Whistleblower Privacy Policy

This Privacy Policy explains how Østermark Grouting ("ØMG", "we" or "us") processes personal information in connection with reports to the Østermark Grouting whistleblower scheme.

The personal data processing that takes place and what rights you have if you are reported via the whistleblower scheme, as well as your rights if you use the whistleblower scheme to make a report about another person, are described in more detail below.

Reference is also made to separate guidelines for the whistleblower scheme, of which e.g. states who can make reports and who can be reported. This

policy only concerns the handling and investigation of reports to the whistleblower scheme, and the policy must therefore be seen with regard to employees in connection with Østermark Grouting's other relevant policies and procedures.

1 DATA RESPONSIBLE

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

Østermark Grouting A/S, CVR-no.: 34476195, Nybovej 34, 7500 Holstebro,
email: mail@oestermarkgrouting.com

2 DESCRIPTION OF THE TREATMENT

| Purpose | Categories of personal information | Sources | Basis for treatment | Recipients | Storage |
|--|---|---|--|---|--|
| <p># 1 Handling and examining Whistleblower alert reporting regarding:</p> <ul style="list-style-type: none"> • The person being reported | <p>We may process the following categories of personal information about you:</p> <p>General personal information:</p> <ul style="list-style-type: none"> • Name, email, phone number • Other information included in the report <p>Sensitive information and information about offenses or possible offenses may be included in the examination.</p> | <p>We may collect information from the following sources:</p> <ul style="list-style-type: none"> • Employees • Former employees • Board or executive members • Auditors • Lawyers • Supplier • Possibly, others who use the whistleblower scheme | <p>We process your personal information based on the following processing basis:</p> <ul style="list-style-type: none"> • GDPR, Article 6.1.f (necessary for the pursuit of legitimate ØMG's interests by being able to search alerts via whistleblower scheme) • GDPR, Article 9.2.b (required for the purpose of complying employment, health and social legal obligations), cf. The Data Protection Act, section 7, subsection 2, and § 12. • GDPR, Article 9.2.f (necessary to determine whether legal claims are valid or defended / and justified) • Section 8 of the Data Protection Act concerning information on criminal offenses and criminal convictions • Section 11 of the Data Protection Act regarding CPR number | <p>We may share your personal information with:</p> <ul style="list-style-type: none"> • External advisors • The police • Public authorities | <p>We will store personal information for as long as is necessary for the following purposes .</p> <ul style="list-style-type: none"> • The information is stored for as long as the investigation is ongoing. Storage period will then depend on the outcome of the investigation. • If the report falls outside the whistleblower scheme, but otherwise not appears unfounded, the information is passed on to ØMG's CEO where they are treated in accordance with the relevant ØMG policies and procedures. • If a report is made to the police or to another authority the information will be kept at least while the investigation with the police or other local authorities is ongoing • If on the basis of the collected information is carried out a disciplinary sanction against the reported or, there are reasons why it is factual and necessary to continue to store the information on the person notified, the information is stored in the person's personnel directory, if reported person is employed and deleted in accordance with the deletion policy for employee data. • If the report turns out to be unfounded, the report ends immediately and personal data are deleted within 45 days from finding of the report had to be considered unfounded. • In other situations, it is specifically assessed whether there are legitimate reasons to store the information and, if so, for how long. |

| Purpose | Categories of personal information | Sources | Basis for treatment | Recipients | Storage |
|--|--|--|--|---|--|
| <p># 2 Handling and Examining Whistleblower Reporting Reports Regarding:</p> <ul style="list-style-type: none"> The person who has filed the report <p>This purpose does not include the examination of the reported information - see above. If there is a suspicion that there is a deliberate false report, this purpose also includes investigating the whistleblower in such situations.</p> | <p>We may process the following categories of personal information about you, provided that you do not choose to make an anonymous report:</p> <p>General personal information:</p> <ul style="list-style-type: none"> Name, e-mail, telephone number, The content of your report Additional information from the group of persons mentioned under "Sources" in cases where there is a suspicion that a deliberate false report has been submitted. <p>As a rule, sensitive information and information about offenses and criminal convictions about you are not processed as part of the handling of the whistleblower report itself - unless you choose to state such information about yourself in the report. However, information about offenses or possible offenses may be included in the processing if there is a suspicion that a deliberate false report has been made.</p> | <p>We may collect information from the following sources:</p> <ul style="list-style-type: none"> You Employees Former employees Board or member of the Executive Board Auditors Lawyers Supplier Possibly, others who using whistleblower-scheme | <p>We process your personal information as described above based on the following processing basis</p> <ul style="list-style-type: none"> Article of the Personal Data Regulation 6.1.f (Necessary for the pursuit of the legitimate interests of the EMG to be able to examine reports in the whistleblower scheme) Article of the Personal Data Regulation 9.2.b (necessary to comply with work, health and social law obligations), cf. The Data Protection Act, section 7, subsection 2, and § 12. Article of the Personal Data Regulation 9.2.f (necessary for legal claims to be determined, asserted or defended) Section 8 of the Data Protection Act concerning information on criminal offenses and criminal convictions Section 11 of the Data Protection Act regarding CPR number | <p>We may share your personal information with:</p> <ul style="list-style-type: none"> External advisors The police Public authorities | <p>We will store personal information for as long as is necessary for the following purposes with:</p> <ul style="list-style-type: none"> The information is kept for as long as the investigation is ongoing. Storage period will then depend on the outcome of the investigation. If the report falls outside the whistle-blower scheme, but otherwise does not appear unfounded, the information is passed on to ØMG's CEO, where they are treated in accordance with the relevant policies and procedures of the ØMG. If a report is made to the police or to another authority the information will be stored, at least as long as investigation is ongoing with the police/authority. If on the basis of the collected information is carried out a disciplinary sanction against the perpetrator the report, or is otherwise available reasons why it is factual and necessary to continue to store the information about it, who made the report shall the information be kept in that person's personnel file, if the reporter is employee. If the report turns out to be unfounded, the report ends immediately and the personal data is deleted after 45 days from the finding that the report had to be considered unfounded. In other situations, it is specifically assessed that whether there are legitimate reasons for storage the information and, if so, for how long. |

3 INFORMATION FOR THE NOTIFIED AND CORRECTION

If you are the subject of a report via the whistleblower scheme, you will be notified as soon as possible after a preliminary investigation has taken place and all relevant evidence has been secured. You will receive information about:

- The identity of the person (s) responsible for the investigation of the notification
- A description of the content of the accusations
- Who has seen the review

As stated below in the section on your general rights, you have the right to gain insight into the notifications filed about you. If we are aware of the whistleblower's identity, you are only entitled to be informed of the identity if you have the right to do so by law. However, you do not have the right to find out the identity of the person who submitted the report if the reporter is anonymous.

If it is concluded that this is a deliberately false report, you will be able to find out who filed the report against you if the notifier's identity is known.

You also have the right to request that information in the notification can be corrected that you believe is incorrect, misleading, incomplete or out of date. If your request is not met, the information will be supplemented by your comments.

4 CONSEQUENCES OF TREATMENT

Reporting to and examining reports to the whistleblower scheme can have significant consequences for the person reported, as reports relate to breaches or suspicions of breaches of the law, as the scheme is otherwise defined in the separate guidelines for the scheme. Similarly,

reporting to the whistleblower scheme can have significant consequences for the person who made the report in the case of a deliberately false report. Such cases may have legal consequences.

5 TRANSFERS TO COUNTRIES OUTSIDE THE EU / EEA

Your personal information is not transferred to countries outside the EU / EEA.

6 YOUR GENERAL RIGHTS

You have the following rights:

- You have the right to request access to, correction of or deletion of your personal information.
- You also have the right to oppose the processing of your personal data and have the processing of your personal data restricted.
- In general, you have an unconditional right to oppose the processing of your personal data for the purpose of direct marketing.
- If the processing of your personal data is based on your consent, you have the right to revoke your consent at any time. Your revocation will not affect the legality of the processing carried out prior to your revocation of your consent.
- You have the right to receive the personal information that you have provided yourself in a structured, commonly used and machine-readable format (data portability).
- You can always lodge a complaint with a data protection authority, e.g. The Data Inspectorate.

In addition, you have the right to object to our processing of your personal data:

- If our processing of your personal data is based on Article 6, para. Article 6 (1) (e) (public interest or exercise of public authority) or Article 6 (1) 1, letter f (balancing of interests), see above under the basis for treatment, you have the right at any time to object to such treatment for reasons that may relate to your special situation.

There may be conditions or limitations to these rights. It is therefore not certain that you e.g., has the right to have information about you deleted in the specific case, this depends on the specific circumstances in connection with the treatment activities. You can exercise your rights by contacting legal@oestermarkgrouting.com.

7 RIGHTS TO COURT

If legal action is taken against you as a result of a notification and subsequent investigation, you have the right to bring the matter before the courts.

8 QUESTIONS

If you have any questions regarding this policy, please feel free to contact: Thomas Bak, CEO, tb@oestermarkgrouting.com.

Updated: June 2022