

Title:
Privacy Policy for Whistleblowers

Valid for (Site initials):
All sites

Reference/ Drawing:
Whistleblower Act

Created by/ Edited by:
Baetr Sales & Services A/S

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Title: Privacy Policy for Whistleblowers		Valid for (Site initials): All sites	Reference/ Drawing: Whistleblower Act		
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1. Introduction

When you use the Baetr whistleblower scheme to submit a whistleblower report about offenses or other serious matters taking place within the Baetr organization, Baetr may process personal data about you.

You can always submit your report anonymously. If you choose to report anonymously, Baetr do not process personal data about you, as the whistleblower site does not keep a log of the IP address or ID of the device from which you submit report or access the whistleblowing site. Furthermore, the whistleblower site does not use cookies.

If you wish to submit an anonymous report, Baetr recommend that you do not submit the report via internal network, IT equipment, telephones, email accounts or other communication belonging to Baetr.

This privacy policy is only relevant in cases where you choose to disclose your identity in relation to your whistleblower report. In these situations, Baetr will process your personal data received through the whistleblower site. Baetr is responsible for the personal data processed through the whistleblower site.

Below you can find a description of the personal data processed as part of the whistleblower scheme, the legal basis for processing personal data, disclosure of personal data, the duration of the processing of personal data, your rights in connection with the processing of your personal data, were applicable, information about the transfer of personal data to third countries.

2. Which personal data is processed

Whistleblower report

If you have chosen to disclose your identity when submitting a whistleblower report, Baetr process ordinary personal data about you in the form of your name, your email address and your telephone number.


The purpose of processing your personal data is to enable further investigation of the matter to which the whistleblower report relates, to enable the subsequent processing of the report and to ensure documentation of the course of events relating to the whistleblower report.

The legal basis for processing ordinary personal data is Article 6(1)(c) of the General Data Protection Regulation (legal obligation), and Article 6(1)(e) of the General Data Protection Regulation (necessary based on public interest).

Creating a secure mailbox

You have the option of creating a secure mailbox where you can communicate, as part of processing the whistleblower report. Regardless of whether you have chosen to submit a report anonymously, or whether you have disclosed your identity when submitting the report, Baetr do not process any personal data about you when using the secure mailbox.

The mailbox is accessed using a case number and password of your choice. It is strongly recommended that your password does not contain personal information, e.g. dates of birth, telephone numbers, etc. If you choose to create a password containing personal data, Baetr will process such personal data in accordance with this privacy policy.

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3. How long do we store your personal data?

Baetr stores your personal data as long as the processing of the data is considered necessary to fulfill Baetr's obligations under the Whistleblower Protection Act and other relevant special legislation applicable to the whistleblower report in question, as well as legislation applicable to each of the entities within the Baetr Group.

Therefore, personal data is stored for as long as Baetr handle the case relating hereto. Once the case is closed, Baetr will store the personal data for as long as Baetr is obligated to ensure documentation of the handling of the case as well as the outcome of the case.

4. Recipients of the personal data

Baetr may engage data processors in the processing of your personal data. Such data processors include suppliers of the Whistleblower site and Baetr's external partner, who assist with the initial handling of the whistleblower reports. These two data processors are, as stated in the individual data processor agreements, instructed to only process personal data on Baetr's behalf and in accordance with instruction.

Where possible, Baetr will keep your personal data confidential in relation to any subsequent handling of the reported matter. Consequently, we will only disclose information about your identity in cases where:

- The case processing is carried out by an external partner and the information is disclosed to the external partner in question
- The whistleblower report results in a police investigation and the information is disclosed to the police
- The disclosure of information is required by applicable law or
- you provide Baetr with your explicit consent to disclose information about your identity.

Finally, Baetr may, in situations where it is considered relevant in relation to the nature of the individual report, disclose your personal data within the Baetr Group.

5. What rights do you have?


According to the General Data Protection Regulation, you have a number of rights when Baetr processes personal data about you. These rights, as well as the opportunity to complain to the relevant data protection agency, depends on the specific Baetr company that you submitted your whistleblower report with.

If you would like to exercise your rights, you can do so by contacting the relevant Baetr entity via the contact details provided in section 1 of this privacy policy.

Right to access personal data (right of access), Article 15

You have the right to request access to the personal data Baetr process about you as well as additional information in connection hereto.

Right to ratification, Article 16

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You have the right to request that inaccurate personal data about you be updated and corrected.

Right to erasure, Article 17

You have the right to request erasure of personal data about you before the regular and general erasure takes place.

Right to restriction of processing, Article 18

You have the right to request that the processing of your personal data is restricted.

If you have the right to have the processing of your personal data limited, Baettr may in the future only process this information – with the exception of storage – with your consent or for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural person or reasons of important public interest.

Right to transmit personal data (data portability), Article 20

You have the right to request that you receive the personal data Baettr process about you in a structured, commonly used and machine-readable format as well as the right to transmit those data to another data controller without hindrance.

Right to object, Article 21

If the processing of your personal data is based on public interest, you have the right to object to Baettr’s otherwise lawful processing of your personal data.

Complain to data protection agencies

You have the possibility to complain about Baettr’s processing of your personal data to the relevant data processing agency concerning the entities within Baettr that processes the data for the individual whistleblower report. Baettr will upon request provide you with the details in order to complain.