



PRIVACY POLICY FOR THE WHISTLEBLOWER SYSTEM OF SCAN GLOBAL LOGISTICS

Version 2.0

Legal regulations for Countries:

»» THE PURPOSE OF PROCESSING PERSONAL DATA IN THE WHISTLEBLOWER SYSTEM

The purpose of processing personal data in the whistleblower system of Scan Global Logistics is to uncover knowledge of serious matters, including suspicion or knowledge of any illegal, unethical or irregular conduct to prevent, limit and follow up on such matters in the entire organisation.

Scan Global Logistics is the data controller of the personal data processed in the whistleblower system. The data come from the group who may raise concerns through the system, i.e. the employees of Scan Global Logistics as well as customers, suppliers and other business partners.

»» CATEGORIES OF PERSONAL DATA THAT WILL BE PROCESSED

A concern raised may contain personal data about the whistleblower himself/herself. A concern raised may also contain general and sensitive personal data regarding the person(s) about whom a concern is raised (the affected persons), if any. The concern raised may also contain data about other persons.

The collected data could be name, position and any other data about the affected person(s). A concern raised will typically contain information about the specific serious concern that is raised and how the affected person, if any, is alleged to have been part of such concern.

A concern raised may include documents in the broad sense, including text, pictorial and video material.

All personal data collected through the system will be treated as confidential to the maximum extent possible.

»» PROCESSING BASIS

It is necessary to process personal data in the whistleblower system to investigate and prevent serious matters at Scan Global Logistics. It is therefore necessary to process data in the whistleblower system for Scan Global Logistics to pursue a legitimate interest that is generally assessed to take precedence over the data subject's interest in protecting the relevant personal data, see clause 6(1)(f) of the General Data Protection Regulation.

Information about any criminal offences, including any assumed criminal offences, will only be processed when the processing is authorised by Union or Member State law providing for appropriate safeguards for the rights and freedoms of data subjects, see clause 10 of the General Data Protection Regulation.

In some cases, a raised concern will contain sensitive personal data such as trade union membership, political opinion, religion, health status, sex life and biometric data.

Such data are only processed if, in addition to pursuing a legitimate interest, see above, the processing is legal under clause 9 of the General Data Protection Regulation. For example, processing of sensitive personal data will be legal if it is necessary to determine, assert or defend legal claims or when courts of law act in their capacity as courts of law.

For example, sensitive personal data may also be processed when it is necessary to comply with the labour law, healthcare law and social security law obligations and specific rights of Scan Global Logistics or affected persons in so far as it is authorised by current legislation or a collective agreement that provides the necessary guarantees for the reported persons' fundamental rights and interests.

Personal data included in a concern raised by an employee etc. in Scan Global Logistics A/S or affiliated companies established in Denmark, is processed in accordance with clause 22 of the Danish Protection of Whistleblowers Act.

It is noted that all categories of personal data processed in connection with reports are only kept as long as necessary in the interests of the investigation of the concern raised and the further course of events.

» RIGHTS**Rights catalogue**

When Scan Global Logistics has registered a reported person and perhaps data about the whistleblower or other persons mentioned in the concern raised, such persons have a right to get insight into the personal data that are being processed about them.

If the persons in question request a right of access, Scan Global Logistics will inform them of:

- the objective of the processing of the data;
- the type of personal data about the person in question that are being processed;
- the right to ask Scan Global Logistics to correct or erase personal data or limit the processing of personal data processed about the relevant person or to object to the processing; and
- any information available about the origins of the processed personal data, but not data about the whistleblower if the whistleblower has raised the concern in good faith.

The right of access only applies to personal data processed about the person himself/herself. It means that a claim cannot be raised to receive access to data that only relate to other persons.

The right of access does not apply if it is found that the person's interest in receiving data about himself/herself should be superseded by important considerations for public or private interests in compliance with the rules of clause 23 of the General Data Protection Regulation and national implementation of these rules.

The person also has a right to object to the processing of data and to request that data be corrected, restricted or erased in compliance with the data protection legislation in force from time to time.

»» STORING AND ERASING PERSONAL DATA

Personal data processed in connection with concerns raised are kept as long as necessary in the interests of the investigation of the concern raised and the further course of events.

If the initial screening of the concern raised shows that the concern raised is not covered by the whistleblower system of Scan Global Logistics or that there is no proof of the concern raised, Scan Global Logistics will erase the concern raised and the personal data included in such concern as soon as possible and no later than three months after the conclusion of the initial screening.

If the initial screening of the concern raised shows that it is not unlikely that the concern raised has taken place, Scan Global Logistics will launch a thorough investigation and at the earliest erase the concern raised, and the personal data included in the concern raised when the investigation has been concluded.

»» GIVING AND DISCLOSING PERSONAL DATA

Scan Global Logistics *makes available* the data received to Law Firm Poul Schmith which as the data processor for Scan Global Logistics is in charge of the initial screening of the received concerns raised.

Scan Global Logistics does not generally *disclose* personal data collected through the whistleblower system to third parties.

However, the following types of disclosure could take place on a case-by-case basis:

- Disclosure to an external advisor, for example an attorney or auditor for the purpose of a detailed investigation of the concern raised;
- Transfer to relevant authorities, including the police and the prosecution service, in contemplation of any legal proceedings;
- Other disclosure required by law.

»» COMPLAINT

You are entitled to lodge a complaint with the Danish Data Protection Agency if you are dissatisfied with the way in which we are processing your personal data. You can find the contact details of the Danish Data Protection Agency at www.datatilsynet.dk.

»» REVIEW AND UPDATE OF POLICY

This Policy is reviewed and updated (if necessary) annually.

»» CONTACT DETAILS

Questions about your rights etc. related to the processing of personal data in relation to the whistleblower system shall be addressed to:

Scan Global Logistics A/S
Jernholmen 49
2650 Hvidovre
Denmark
Company registration number: 14049673

You may contact Scan Global Logistics' Global General Counsel by telephone +45 26 72 78 94 or via e-mail hchr@scangl.com or SGL Group Compliance at compliance@scangl.com