

WHISTLEBLOWER PRIVACY POLICY (GDPR)

4 February 2026

Here you can read about how we process your personal data in connection with reports submitted through our whistleblower scheme.

Please note that Kromann Reumert Law Firm is independently data controller for the processing of personal data in the whistleblower portal.

1. Data controller and contact information

The data controller for the processing of the personal data is:

Salling Group A/S

CVR.no.: 3595 4716

Rosbjergvej 33-35

8220 Brabrand

Phone.: +45 8778 5000

Mail: privacy@sallinggroup.com

Web: sallinggroup.com/en/contact

2. Processing of personal data

The collection of personal data submitted in connection with a report to the whistleblower scheme and the processing of personal data that occurs in connection with the follow-up to a report are generally regulated by data protection legislation, including the General Data Protection Regulation and the supplementary rules in Act no. 502 of May 23, 2018 on supplementary provisions to the regulation on the protection of natural persons with regard to the processing of personal data and on the free movement of such data ('The Data Protection Act').

The processing of personal data may take place when it is necessary to handle reports received through Salling Group's whistleblower scheme.

According to the General Data Protection Regulation, there is a duty to inform data subjects, including whistleblowers, concerned persons and any third parties mentioned in the report.

2.1 Categories of personal data

In connection with the handling of a report, Salling Group will process the personal data stated in the report. The personal data processed in particular in the context of a report are identity and contact details as well as the description of the circumstances/actions that led to a report, including, where appropriate, sensitive personal data as well as information on criminal offences and other purely private matters.

The investigation of the report may also result in the collection and processing of additional personal data outside of that which is indicated in the report.

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

Salling Group may process personal data about whistleblowers, concerned persons and other persons mentioned in reports when it is necessary to process the reports received in the whistleblower scheme established under the Danish Whistleblower Act.

The personal data processed in particular in the context of a report are the name and contact details as well as the personal data contained in the description of the circumstances/actions that led to a report, including, where applicable, information on criminal offences and other purely private matters.

Personal data may also be processed when the processing of such personal data is necessary for the follow-up to the reports. This can, for example, be the processing of personal data that occurs in connection with the conduct of interviews with relevant employees, members of the executive board and the board of directors, employment law sanctioning as well as the notification of relevant authorities and filing of police reports.

It is not the intention to collect special categories of personal data, including, for example, health information, through the whistleblower scheme. However, this may prove relevant and necessary in the context of an investigation of the reported facts (e.g., where information on potential occupational injuries or possible accidents at work is to be processed in connection with the reporting of occupational safety matters).

The legal basis for the necessary processing of personal data follows from Section 22 of the Whistleblower Act.

If a report that falls outside the scope of the Whistleblower Act is submitted and processed in Salling Group's Whistleblower Unit, the legal basis for the processing of personal data is as follows:

- general personal data are processed in accordance with the General Data Protection Regulation art. 6(1)(c and e).
- special categories of personal data are processed pursuant to art. 9(2)(f and g)
- information about criminal offences is processed in accordance with section 8, para. 1 and 2, no.3 of the Danish Data Protection Act

2.3 Categories of recipients of personal data

It may be necessary for Salling Group to forward personal data from a report to others. This may, for example, include the transfer of personal data to the following categories of recipients:

- Authorised employees of relevant units/departments within the Salling Group organisation
- The law firm that supports the whistleblower scheme and thereby provides legal, technical and administrative assistance
- External advisers who assist, for example, with legal assistance in connection with the handling of a specific report
- Public authorities such as the police, for example, if the forwarding is made to respond to reported violations.

2.4 Obligation to inform persons concerned and any third parties mentioned in Whistleblower reports

Salling Group has an obligation to inform persons concerned and any third parties mentioned in reports about the processing of their personal data in connection with the handling of a report. As a rule, specific information must be provided to them within a reasonable period after the collection of the personal data and no later than within one month.

However, the obligation to inform may be postponed or refrained from after a specific assessment, for example, for the investigation of a case or for essential reasons for Salling Group, including considerations of the company's business basis, business practices, know-how and so on that exceed the considerations of the data subjects. An exemption from the obligation to provide information may be made if and to the extent that it follows from the General Data Protection Regulation art. 14(5) or section 22, para. 1 of the Danish Data Protection Act.

2.5 Transfer to third countries

Personal data collected and stored in the electronic whistleblower system will not be transferred to a third country, i.e., countries outside the EU/EEA.

To the extent that the processing of your personal data in connection with the follow-up to a report may involve a transfer to a third country, for example, when using a hosting provider established in a country outside the EU/EEA, Salling Group will ensure that such a transfer is legal at all times, including ensuring that the General Data Protection Regulation's requirements for establishing an adequate level of protection for the transfer are met, and you will be informed about this.

2.6 Storage of your personal data

Reports will only be stored for as long as is necessary and proportionate to comply with the requirements set out in the Danish Whistleblower Act. This means that storage will not be extended beyond what is necessary to meet the obligations under the Danish Whistleblower Act, including, in particular, the whistleblowers' and concerned persons' potential need to secure evidence, as well as Salling Group's obligation to follow up on received reports, including the linking of such reports with previously received reports.

A concrete assessment will be made on an ongoing basis concerning how long the continued storage of previously received reports is necessary. The concrete assessment will include whether it is likely that persons entitled to protection under the Whistleblower Act may need to document the report in question. The case for continued storage will be strengthened if there is reason to believe that the report may be substantiated by subsequent reports of the same issue, for example, because Salling Group has already received several reports on the said issue. Continued storage may also be necessary to fulfil a legal obligation under other legislation.

If a disciplinary sanction is implemented against a reported employee, or there are other reasons why it is reasonable and necessary to continue to store information, the information may be stored on the employee's personnel file. In this case, the information must be deleted no later than 72 months (the current financial year (calendar year) plus 5 years) after the employee's resignation, unless in the specific case it is still relevant and necessary to store the information, for example, as a result of pending litigation.

2.7 Your rights

As a data subject, i.e., as a whistleblower, concerned person or third party mentioned in the report, you have the following specific rights unless exceptionally stated otherwise by the General Data Protection Regulation or the Danish Data Protection Act:

Right of access)

You have the right to request access to the personal data we process about you, and thereby also the right to receive a copy of your personal data and be informed about:

- The purposes of the processing
- The categories of personal data
- Recipients or categories of recipients, including recipients in any third country and, in this context, the necessary guarantees for the transfer
- The storage period or the criteria for determining it
- The right to the rectification, erasure, restriction and objection to the processing of your personal data
- The right to complain to the Danish Data Protection Agency
- Where your personal data originates from, if it has not been collected from you.

Right to rectification (correction)

You have the right to have incorrect personal data about you corrected without undue delay and the right to request request that incomplete personal data be completed.

However, it should be noted that information about you in a report and its accuracy may be based on allegations, which is why information you may find incorrect may not necessarily be considered incorrect.

Right to deletion

You have the right to request that personal data concerning you be deleted without undue delay in certain circumstances, for example, if the personal data is no longer necessary to fulfil the purposes for which it was collected or otherwise processed.

Right to restrict processing

You have the right to request the restriction of the processing of your personal data, for example, in connection with contesting the accuracy of your personal data.

Right to transmit data (data portability)

You have the right to request to receive the personal data you have provided to us in a structured, commonly used, and machine-readable format, and the right to request that such personal data be transmitted to another data controller, if certain specific conditions are met.

Right to object

You have the right to object to the processing of your personal data as part of the processing of a report in the whistleblower scheme. If the objection is justified, no further processing of the personal data may take place.

Right to complain to the Danish Data Protection Agency

If you disagree with the way in which Salling Group processes your personal data, you have the right to file a complaint with the Danish Data Protection Agency. The Danish Data Protection Agency's contact information can be found [here](#). However, we hope that you will contact us initially using the contact information below so we can try to to resolve the matter together.

If you are covered by Salling Group's whistleblower scheme, you can exercise your rights by contacting Salling Group here: privacy@sallinggroup.com.