PRIVACY POLICY FOR WHISTLEBLOWER ARRANGEMENT

This Privacy Policy explains how Netcompany Banking Services A/S ("Netcompany Banking Services", "**we**" or "**us**") processes personal information in connection with reports to Netcompany Banking Services' Whistleblower Arrangement.

Below is a description of the personal data processing that takes place and the rights you have if you are reported through the Whistleblower Arrangement, as well as your rights if you use the Whistleblower Arrangement to report another person.

Reference is also made to Netcompany Banking Services' Whistleblower Policy, containing information about who can submit reports and who can be reported.

This policy only concerns the handling and the investigation of reports submitted through the Whistleblower Arrangement. Therefore, this policy must - in relation to employees - be seen in connection with Netcompany Banking Services' other relevant policies and procedures.

1 DATA CONTROLLER

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

Netcompany Banking Services A/S

CVR.no.: 45388689

Strandgade 3

1401 København K

Email: gdpr@netcompany.com

2 DESCRIPTION OF THE PROCESSING

2.1 Mandatory Whistleblower Arrangement pursuant to the Danish Whistleblower Act

The following is a description of how Netcompany Banking Services will process information on the person who is reported about (the "**Reported Person**") as well as the person who is submitting the report (the "**Whistleblower**") in connection with reports to Netcompany Banking Services' Whistleblower Arrangement established pursuant to the Danish Whistleblower Act.

Purpose	Categories of Personal Data	Legal Basis for the Processing	Recipients	Data Retention
#1 Handling and investigation of reports under Netcompany Banking Services' Whistleblower Arrangement regarding: • The Reported Person **Sources** We can collect information from the following sources: • Plesner Law Firm • Employees of Netcompany Banking Services • Self-employed persons • Shareholders and members of the executive board, board of directors, or similar governing body in the undertaking • Volunteers • Paid and/or unpaid trainees • Persons working under the supervision and management of contracting parties, suppliers, and sub-suppliers • Persons who are reporting information to which they have gained access in a work-related relationship that has ceased since then • Persons in work-related relationships that have not yet commenced, who report information on violations to which they have gained access during the course of the	We can process the following personal data categories about you: Ordinary personal data: • Name, email telephone number, • Other information included in the report. Sensitive information, including information on sexual matters, may be included in the processing. Information on criminal offences or possible criminal offences may also be included in the processing.	We process your personal data on the following bases: • Section 22 of the Danish Whistleblower Act: Necessary to enable Netcompany Banking Services to process reports received under Netcompany Banking Services' Whistleblower Arrangement, established pursuant to the Danish Whistleblower Act, cf. - GDPR, Article 6.1.c: Necessary for the compliance with a legal obligation to which Netcompany Banking Services is subject pursuant to Section 9 of the Danish Whistleblower Act; - GDPR, Article 6.1.e: necessary for the performance of a task carried out in the public interest; - GDPR, Article 9.2.g: Processing is necessary for reasons of substantial public interest, on the basis of Section 9 of the Danish Whistleblower Act; - Section 8 (5) of the Danish Data Protection Act, cf. Section 7 (4), cf. GDPR, Article 9.2.g.	We can share your personal information with: • Plesner Law Firm • Netcompany Group A/S • NC TopCo A/S • Netcompany A/S IT suppliers • External advisors • The police • Public authorities, e.g., the Danish Financial Supervisory Authority, the Danish Data Protection Agency, or relevant tax authorities.	We will retain personal data for as long as it is necessary for the purposes listed. • The data are retained for as long as the investigation is in progress. The retention period depends on the outcome of the investigation. • Reports submitted to the Arrangement are in principle deleted after 45 days, unless Netcompany Banking Services has legitimate reasons for continued retention. • Reports falling outside the scope of the Arrangement, but not appearing to be unfounded, will be passed on to Netcompany Group's General Counsel where they will be processed in accordance with Netcompany Banking Services' relevant policies and procedures. • Reports turning out to be unfounded will be immediately closed in the Arrangement and deleted within 45 days after having been deemed to be unfounded. • If a report is conveyed to the police or another public authority, the data will be retained for at least as long as the investigation is in progress at the police/public authority.

Commented [NILM1]: Sources are defined in relation to the chosen Arrangement.

recruitment process or other pre-contractual negotiations.				• Otherwise, the data will be retained in accordance with Netcompany Banking Services' deletion policy.
Purpose	**Categories of Personal Data**	**Legal Basis for the Processing**	**Recipients**	**Data Retention**
#2 Handling and investigation of reports under Netcompany Banking Services' Whistleblower Arrangement regarding: • The Whistleblower If there is suspicion of the report being deliberately false, this purpose also comprises investigation of the Whistleblower. **Sources** We can collect information from the following sources: • Plesner Law Firm • You	We can process the following categories of personal data about you, provided that your report is not anonymous: <u>Ordinary personal data</u>: • Name, email, telephone number, • The contents of your report. As a rule, no sensitive information about you will be processed as part of the handling of the report - unless you choose to provide such information yourself. However, information on criminal offences or possible criminal offences may be included in the processing if there is a suspicion that the submitted report is deliberately false.	We process your personal data as described above on the following bases: • Section 22 of the Danish Whistleblower Act: Necessary to enable Netcompany Banking Services to process reports received under Netcompany Banking Services' Whistleblower Arrangement, established pursuant to the Danish Whistleblower Act, cf. - GDPR, Article 6.1.c: Necessary for the compliance with a legal obligation to which Netcompany Banking Services is subject pursuant to Section 9 of the Danish Whistleblower Act; - GDPR, Article 6.1.e: Necessary for the performance of a task carried out in the public interest; - GDPR, Article 9.2.g: Processing is necessary for reasons of substantial public interest, on the basis of Section 9 of the Danish Whistleblower Act; - Section 8 (5) of the Danish Data Protection Act, cf. Section 7 (4), cf. GDPR, Article 9.2.g.	We can share your personal information with: • Plesner Law Firm • Netcompany Group A/S • NC TopCo A/S • Netcompany A/S IT suppliers • External advisors • The police • Public authorities, e.g., the Danish Financial Supervisory Authority, the Danish Data Protection Agency, or relevant tax authorities.	We will retain personal data for as long as it is necessary for the purposes listed. • The data are retained for as long as the investigation is in progress. The retention period depends on the outcome of the investigation. • Reports submitted to the Arrangement are in principle deleted after 45 days, unless Netcompany Banking Services has legitimate reasons for continued retention. • Reports falling outside the scope of the Arrangement, but not appearing to be unfounded, will be passed on to Netcompany Group's General Counsel where they will be processed in accordance with Netcompany Banking Services' relevant policies and procedures. • Reports turning out to be unfounded will be immediately closed in the Arrangement and deleted within 45 days after having been deemed to be unfounded. • If a report is conveyed to the police or another public authority, the data will be retained for at least as long as the investigation is in progress at the police/public authority. • Otherwise, the data will be stored in accordance with Netcompany Banking Services' deletion policy.

3 INFORMATION TO THE REPORTED PERSON AND RECTIFICATION

If you are subject to a report submitted through the Whistleblower Arrangement, you will be notified as soon as possible after an initial investigation has taken place and all relevant evidence is secured. In this connection, you will receive information about:

- The identity of the person(s) who is/are responsible for the investigation of the report
- A description of the contents of the report

As mentioned below in the section about your general rights, you have a right of access to the report that was submitted about you. However, your right to access to the report might be limited in accordance with the Danish Whistleblower Act.

You also have the right to request rectification of the information in the report if you believe this to be false, misleading, or incomplete. If your request in this respect cannot be met, the information will be supplemented with your comments.

4 CONSEQUENCES OF THE PROCESSING

Reports and investigation of reports to the Whistleblower Arrangement may have significant consequences for the person who is reported, as reports concern violations or suspected violations of the law, as further outlined in the separate guidelines for the Arrangement.

Likewise, a report to the Whistleblower Arrangement may have significant consequences for the person who has submitted the report in case of a deliberately false report. Such cases may have criminal consequences.

5 TRANSFERS TO COUNTRIES OUTSIDE THE EU/EEA

Your personal data will not be transferred to countries outside the EU/EEA.

6 YOUR GENERAL RIGHTS

You have the following rights:

- You have the right to request access to and rectification or deletion of your personal data.
- You also have the right to object to the processing of your personal data and have the processing of your personal data restricted.
- You have the right to receive the personal information provided by yourself in a structured, commonly used and machine-readable format (data portability).
- You may always lodge a complaint with a data protection supervisory authority, e.g. The Danish Data Protection Agency.

You are furthermore entitled to dispute our processing of your personal data in the following events:

- If our processing of your personal data is based on the GDPR, Article 6.1 (e) (public interest or exercise of official authority) or Article 6.1 (f) (balancing of interests), see above under legal basis for the processing, you are, at any time, entitled to dispute such processing for reasons related to your particular situation.

There may be conditions or limitations on these rights, e.g., you may not be entitled to deletion of your personal data in a specific case – this depends on the specific circumstances of the processing activities.

You can make use of your rights by contacting gdpr@netcompany.com.

7 IT POLICY

For employees of Netcompany Banking Services, reference is made to Netcompany's Employee Handbook containing information on Netcompany's IT and email policy.

8 QUESTIONS

If you have any questions regarding this policy, please feel free to contact legal@netcompany.com .

Last updated: 01 October 2025