

## **PRIVACY POLICY – Whistleblower channel**

LU-VE Sweden AB, org. No. 556869-1322, hereinafter also referred to as "the Company", has in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) ("**GDPR**"), established this Privacy Policy for the processing of your personal data carried out in the handling of the reports regulated in accordance with the Company's Whistleblower channel, see <https://whistleblowing.luvegroup.com/>.

### **Purpose and legal basis for the processing and where the data comes from**

Your personal data is processed for purposes related to the application of the procedure and process for the purpose of complying with obligations under national legislation, regulations or EU law regarding whistleblowing. The company enables employees and others within the company to report misconduct within the company. We process personal data about the person reporting the misconduct in order to investigate and follow up on what has been reported. We may also process personal data about the person or persons to whom a report relates.

Personal data is collected from the person who makes a report through the company's internal reporting channel and also from any subsequent contacts (including the person who has reported) in a subsequent investigation.

We have a legal obligation under the Act (2021:890) on the Protection of Persons Who Report Misconduct (the Whistleblower Act) to provide a whistleblower channel, and our processing of your personal data is based on this legal obligation (GDPR, Article 6.1(c)). This also applies to the processing of personal data relating to criminal convictions and offences. If the processing of special categories of personal data occurs, it is necessary for reasons of substantial public interest on the basis of EU law and Swedish law (GDPR, Article 9(2)(g)).

### **Categories of personal data we process**

#### **1. Information about the reporter**

The categories of personal data we process depend on how you choose to report. As a starting point, we will only process the personal data that you choose to provide. This may include personal data such as your name, contact information, position, department or other data that you choose to include in your reporting, such as voice recordings, pictures or special categories of personal data (personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, data concerning health or data concerning a natural person's sex life or sexual orientation).

You can always choose to report anonymously. You report anonymously by clicking "Report anonymously" before completing your report. If you choose the anonymous reporting option, we will not process any personal data about you (with the exception of the personal data you included in the report).

Please note that it may be more difficult to investigate reports received anonymously as it limits our ability to communicate with you and ask supplementary questions.

#### **2. Information about the person included in a report**

If you are included in a report, we process the personal data about you included in it and/or, if applicable, the personal data that comes to our attention during a subsequent investigation. This may include personal data such

as photos and special categories of personal data (personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, data concerning health or data concerning a natural person's sex life or sexual orientation).

Our processing of personal data may also include personal data about criminal convictions and offences.

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### **Retention period of personal data**

The Company will store your personal data for the time deemed necessary for the processing of the report. Personal data will be stored for two (2) years after an investigation has been completed unless we need to keep the personal data for a longer period to handle future claims or disputes.

Personal data that is clearly not useful for handling a specific report will not be processed, and if it is collected by mistake, it will be deleted immediately.

### **Data processing methods**

All processing of personal data is carried out in accordance with the GDPR. The data processing is carried out manually (e.g. on paper) and/or by automated means (e.g. by means of electronic processes and/or media), with logic related to the purposes listed above and, in any case, to guarantee the security and confidentiality of the data. The report management system guarantees at every step the confidentiality of the content of the report (including information about any third parties included in the report) and the identity of the whistleblower, the persons involved, the persons named in the report and the intermediary, including by using encrypted communication.

### **Data Controller and Data Protection Officer**

LU-VE Sweden AB is the data controller for the processing of personal data carried out in accordance with the Company's internal reporting channel.

### **Contact information for the company:**

Address: Södra industrivägen 2-4, 374 50 Asarum

Phone number: +46 454 334 00

E-post: [whistleblowing.se@luvegroup.com](mailto:whistleblowing.se@luvegroup.com)

Contact details of the Data Protection: [whistleblowing.se@luvegroup.com](mailto:whistleblowing.se@luvegroup.com)

This Privacy Policy supplements the Company's Privacy Policy, see

[https://exchangers.luvegroup.com/cms/view/home/privacy/s4/c1768?language\\_code=ENG](https://exchangers.luvegroup.com/cms/view/home/privacy/s4/c1768?language_code=ENG)



### **Third parties with whom we may share your personal data**

A smaller, limited, autonomous and independent group of our employees will have access to the report and the personal data contained in it. These individuals will carry out the initial assessment of the report and, if appropriate, take action on the information provided by the reporter in the report.

We may also share your personal data with third parties such as:

1. Consultants (authorities, legal and financial advisors or auditors if necessary);
2. External structures that cooperate directly with the company in the technical and IT management of the whistleblowing channel, as well as other external persons to whom the data must be communicated by law.

### **Transfer of data to a third country and/or an international organisation**

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

### **Your rights**

#### *Right to receive information and access to personal data*

As a whistleblower, you have the right to access the data that concerns you and why we process it at any time. You also have the right to receive a copy of any personal data that we hold about you.

#### *Right to rectification of inaccurate data*

If we process personal data about you that is incorrect, you have the right to request that we correct it. You also have the right to supplement personal data with additional information when it is necessary for the personal data to be accurate.

When we have corrected your personal data or it has been completed, we will also inform those with whom we share your personal data about the update or updates, provided that it is possible and not too burdensome for us. You can also ask us about who we have shared your personal data with.

If you request that personal data about you be corrected, you also have the right to request that we restrict our processing of your personal data while we investigate your request.

### *Right to erasure*

In some cases, you have the right to have your personal data deleted. You have the right to have your personal data erased if i) the personal data is no longer necessary for the purpose for which it was collected, ii) you object to processing that is based on our legitimate interest and we cannot demonstrate acceptable reasons that outweigh your interests, iii) the personal data is processed in violation of the law, or vi) deletion is a requirement to comply with a legal obligation.

If we delete personal data following a request from you, we will also inform those with whom we have shared your personal data, provided that this is possible and not too burdensome for us. You can also ask us about who we have shared your personal data with.

### *Right to object to processing*

You can object at any time the processing of your personal data that is based on our legitimate interest. If you object the processing, we may no longer process the personal data for the purpose in question, unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or for the establishment, exercise or defense of legal claims. You also have the right to know how we balance the interests or fundamental rights and freedoms of the data subject with our legitimate interest in processing the personal data. If you object to the processing, you also have the right to request that we restrict the processing of your personal data while we investigate your request.

### *Right to restriction*

Restriction means that the personal data is marked so that it may only be processed for certain specified purposes. The right to restriction applies in the following cases:

1. When you believe that personal data is incorrect and you have requested correction. You can then also request that we restrict the use while we investigate whether the personal data is correct or not.
2. If the use is unlawful but you do not want the personal data to be deleted.
3. When we no longer need the personal data for the stated purpose for which it was collected, but you need it to establish or defend a legal claim.
4. If you object to the processing of personal data, you can request that we restrict the use of your personal data while we investigate whether our interest in the processing outweighs your interests.

Even if you have requested that we restrict the use of your personal data, we have the right to use it

for storage, if we have obtained your consent to do so, to establish, exercise or defend legal claims, or to protect someone's rights. We may also use the personal data if the processing is necessary for the performance of a task carried out in the public interest.

If we restrict our processing of your personal data, we will also inform those with whom we share your personal data, provided that this is possible and not too burdensome for us. You can also ask us about who we have shared your personal data with.

#### *Your right to lodge a complaint*

If you do not believe that we are processing your personal data correctly, you are welcome to contact us. You also have the right to complain to the competent supervisory authority in the country where you are domiciled, work or where the alleged infringement has taken place. In Sweden, the supervisory authority is the Swedish Authority for Privacy Protection, see website [here \(https://www.imy.se/\)](https://www.imy.se/).