

INFORMATION ABOUT THE PROCESSING OF PERSONAL DATA - WHISTLEBLOWER ARRANGEMENTS

IMPACT FUND DENMARK

This document explains how Impact Fund Denmark (the "**Fund**", "**we**" or "**us**") processes personal data in connection with reports to our whistleblower arrangements.

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

Reference is also made to our Whistleblower Policy, containing information about who can submit reports and who can be reported.

This document only concerns the handling and the investigation of reports submitted through the whistleblower arrangements. Therefore, this document must - in relation to employees - be seen in connection with our other relevant documents, policies and procedures.

1 DATA CONTROLLER

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

Impact Fund Denmark

CVR.no.: 23 59 86 12

Fredericiagade 27

1310 København K

Email: contact@impactfund.dk

2 DESCRIPTION OF THE PROCESSING

2.1 Mandatory whistleblower arrangement pursuant to the Danish Whistleblower Act

The following is a description of how we process personal data about the person who the report is about (the "**Reported Person**") as well as the person submitting the report (the "**Whistleblower**") in connection with reports to our 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 our whistleblower arrangement regarding: <ul style="list-style-type: none"> The Reported Person 	We can process the following categories of personal data about the Reported Person: <u>Ordinary personal data:</u> <ul style="list-style-type: none"> Name, email and telephone number, Other information included in the report. <u>Any sensitive personal data</u> included in the report. <u>Any personal data relating to (possible) criminal convictions and offences</u> included in the report.	We process the personal data on the following legal bases: <ul style="list-style-type: none"> Section 22 of the Danish Whistleblower Act: Processing is necessary to enable us to handle and investigate reports received under our whistleblower arrangement, established pursuant to the Danish Whistleblower Act, cf. <ul style="list-style-type: none"> GDPR Art. 6.1.c: Processing is necessary for the compliance with a legal obligation to which we are subject pursuant to Section 9 of the Danish Whistleblower Act; GDPR Art. 6.1.e: Processing is necessary for the performance of a task carried out in the public interest; GDPR Art. 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 Art. 9.2.g: 	We can disclose and share the personal data with: <ul style="list-style-type: none"> IT suppliers, External advisors, The police, Public authorities, e.g., the Danish Data Protection Agency and other relevant authorities. 	We will retain personal data for as long as it is necessary for the stated purposes. <ul style="list-style-type: none"> The personal data is retained for as long as the investigation is in progress. The retention period depends on the outcome of the investigation. Reports submitted to the whistleblower arrangement are in principle deleted after 45 days, unless we have legitimate reasons for continued retention. Reports falling outside the scope of the whistleblower arrangement, but not appearing to be unfounded, will be passed on to the responsible within our organisation where they will be processed in accordance with our relevant policies and procedures. Reports turning out to be unfounded will be immediately closed in the whistleblower 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 personal data will be retained for at least as long as the investigation is in progress at the police/public authority.
Sources We can collect personal data from the following sources: <ul style="list-style-type: none"> The Whistleblower, Individuals who provide statements or participate in interviews as part of the investigation of the report, Law firm(s). 				

		Processing is necessary for reasons of substantial public interest, on the basis of Section 9 of the Danish Whistle-blower Act.		
Purpose	Categories of personal data	Legal basis for the processing	Recipients	Data retention
<p>#2 Handling and investigation of reports under our whistleblower arrangement regarding:</p> <ul style="list-style-type: none"> The Whistleblower <p>If there is suspicion of the report being deliberately false, this purpose also covers investigation of the Whistleblower.</p>	<p>We can process the following categories of personal data about the Whistleblower, provided that the report is not anonymous:</p> <p><u>Ordinary personal data:</u></p> <ul style="list-style-type: none"> Name, email and telephone number, Other information included in the report. 	<p>We process the personal data based on the following legal bases:</p> <ul style="list-style-type: none"> Section 22 of the Danish Whistle-blower Act: Processing is necessary to enable us to handle and investigate reports received under our whistleblower arrangement, established pursuant to the Danish Whistleblower Act, cf. <ul style="list-style-type: none"> GDPR Art. 6.1.c: Processing is necessary for the compliance with a legal obligation to which we are subject pursuant to Section 9 of the Danish Whistleblower Act; GDPR Art. 6.1.e: Processing is necessary for the performance of a task carried out in the public interest; GDPR Art. 9.2.g: Processing is necessary for reasons of substantial public interest, on the basis of Section 9 of the Danish Whistle-blower Act; Section 8(5) of the Danish Data Protection Act, cf. Section 7(4), cf. GDPR Art. 9.2.g: Processing is necessary for reasons of substantial public interest, on the basis of 	<p>We can disclose and share the personal data with:</p> <ul style="list-style-type: none"> IT suppliers, External advisors, The police, Public authorities, e.g., the Danish Data Protection Agency and other relevant authorities. 	<p>We will retain personal data for as long as it is necessary for the stated purposes.</p> <ul style="list-style-type: none"> The personal data is retained for as long as the investigation is in progress. The retention period depends on the outcome of the investigation. Reports submitted to the whistleblower arrangement are in principle deleted after 45 days, unless we have legitimate reasons for continued retention. Reports falling outside the scope of the whistleblower arrangement, but not appearing to be unfounded, will be passed on to the responsible within our organisation where they will be processed in accordance with our relevant policies and procedures. Reports turning out to be unfounded will be immediately closed in the whistleblower 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 personal data will be retained for at least as long as the investigation is in progress at the police/public authority.
Sources				
<p>We can collect personal data from the following sources:</p> <ul style="list-style-type: none"> The Whistleblower him- or herself, Individuals who provide statements or participate in interviews as part of the investigation of the report, Law firm(s). 	<p>As a main rule, no <u>sensitive personal data</u> is processed as part of the handling of the report, unless the Whistleblower chooses to provide such information about him- or herself.</p> <p><u>Personal data relating to (possible) criminal convictions and offences</u> can be covered by the processing if there is a suspicion that the submitted report is deliberately false.</p>			

		Section 9 of the Danish Whistleblower Act.		
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2.2 Voluntary Whistleblower Arrangement

The following is a description of how we process personal data about the person who the report is about (the "**Reported Person**") as well as the person submitting the report (the "**Whistleblower**") in connection with reports to our voluntary whistleblower arrangement.

Purpose	Categories of personal data	Legal basis for the processing	Recipients	Data retention
#1 Handling and investigation of reports under our voluntary whistleblower arrangement regarding: <ul style="list-style-type: none"> The Reported Person 	We can process the following categories of personal data about the Reported Person: <u>Ordinary personal data:</u> <ul style="list-style-type: none"> Name, email and telephone number, Other information included in the report. <u>Any sensitive personal data</u> included in the report. <u>Any personal data relating to (possible) criminal convictions and offences</u> included in the report.	We process the ordinary personal data based on the following legal basis: <ul style="list-style-type: none"> GDPR Art. 6.1.f: Processing is necessary for the pursuit of our legitimate interests in handling and 	We can disclose and share the personal data with: <ul style="list-style-type: none"> IT suppliers, External advisors, The police, Public authorities, e.g., the Danish Data Protection Agency and other relevant authorities. 	We will retain personal data for as long as it is necessary for the stated purposes. <ul style="list-style-type: none"> The personal data is retained for as long as the investigation is in progress. The retention period depends on the outcome of the investigation. Reports submitted to the whistleblower arrangement are in principle deleted after 45 days, unless we have legitimate reasons for continued retention. Reports falling outside the scope of the whistleblower arrangement, but not appearing to be unfounded, will be passed on to the responsible within our organisation where they will be processed in accordance with our relevant policies and procedures. Reports turning out to be unfounded will be immediately closed in the whistleblower 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 personal data will be retained for at least as long
Sources We can collect personal data from the following sources: <ul style="list-style-type: none"> The Whistleblower, Individuals who provide statements or participate in interviews as part of the investigation of the report, Law firm(s). 				

		<p>investigating reports under the whistleblower arrangement;</p> <p>We process any sensitive personal data based on the following legal basis:</p> <ul style="list-style-type: none"> GDPR Art. 9.2.f: Processing is necessary for the establishment, exercise, and/or defence of legal claims; <p>We process any personal data relating to (possible) criminal convictions and offences on the following legal bases:</p> <ul style="list-style-type: none"> Section 8(5) of the Danish Data Protection Act, cf. Section 7(1) of the Act, cf. GDPR Art. 9.2.f: When processing is necessary for the establishment, exercise and/or defence of legal claims; Section 8(3), in fine, of the Danish Data Protection Act: When processing is necessary for the purpose of safeguarding a legitimate interest and this interest clearly overrides the interests of the Reported Person. 		as the investigation is in progress at the police/public authority.
Purpose	Categories of personal data	Legal basis for the processing	Recipients	Data retention
<p>#2 Handling and investigation of reports under our voluntary whistleblower arrangement regarding:</p> <ul style="list-style-type: none"> The Whistleblower <p>If there is suspicion of the report being deliberately false, this purpose also covers the investigation of the Whistleblower.</p>	<p>We can process the following categories of personal data about the Whistleblower, provided that the report is not anonymous:</p> <p><u>Ordinary personal data:</u></p> <ul style="list-style-type: none"> Name, email and telephone number, 	<p>We process the ordinary personal data based on the following legal basis:</p> <ul style="list-style-type: none"> GDPR Art. 6.1.f: Processing is necessary for the pursuit of our legitimate interests in handling and 	<p>We can disclose and share the personal data with:</p> <ul style="list-style-type: none"> IT suppliers, External advisors, The police, Public authorities, e.g., the Danish Data Protection 	<p>We will retain personal data for as long as it is necessary for the stated purposes.</p> <ul style="list-style-type: none"> The personal data is retained for as long as the investigation is in progress. The retention period depends on the outcome of the investigation. Reports submitted to the whistleblower arrangement are in principle deleted

Sources	<ul style="list-style-type: none"> Other information included in the report. <p>As a main rule, no <u>sensitive personal data</u> is processed as part of the handling of the report, unless the Whistleblower chooses to provide such information about him- or herself.</p> <p><u>Personal data relating to (possible) criminal convictions and offences</u> can be covered by the processing if there is a suspicion that the submitted report is deliberately false.</p>	<p>investigating reports under the whistleblower arrangement;</p> <p>We process any sensitive personal data based on the following legal basis:</p> <ul style="list-style-type: none"> GDPR Art. 9.2.f: Processing is necessary for the establishment, exercise, and/or defence of legal claims; <p>We process any personal data relating to (possible) criminal convictions and offences on the following legal bases:</p> <ul style="list-style-type: none"> Section 8(5) of the Danish Data Protection Act, cf. Section 7(1) of the Act, cf. GDPR Art. 9.2.f: When processing is necessary for the establishment, exercise and/or defence of legal claims; Section 8(3), in fine, of the Danish Data Protection Act: When processing is necessary for the purpose of safeguarding a legitimate interest and this interest clearly overrides the interests of the Whistleblower. 	<p>Agency and other relevant authorities.</p>	<p>after 45 days, unless we have legitimate reasons for continued retention.</p> <ul style="list-style-type: none"> Reports falling outside the scope of the whistleblower arrangement, but not appearing to be unfounded, will be passed on to the responsible within our organisation where they will be processed in accordance with our relevant policies and procedures. Reports turning out to be unfounded will be immediately closed in the whistleblower 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 personal data will be retained for at least as long as the investigation is in progress at the police/public authority.
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3 INFORMATION TO THE REPORTED PERSON AND RECTIFICATION

If you are included in a report submitted through the whistleblower arrangements, you will be notified as soon as possible after an initial investigation has taken place and all relevant evidence is secured. In connection with this, you will receive the following information:

- 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 of access might among other things be limited according to 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 arrangements may have significant consequences for the person who is reported, as reports generally concern violations or suspected violations of the law, as further outlined in the separate guidelines for the whistleblower arrangements.

Likewise, a report to the whistleblower arrangements 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 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 have the processing of your personal data restricted.
- You have the right to receive the personal data 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.

Further, you have the right to object to our processing of personal data about you when our processing is based on GDPR Art. 6.1.e about namely the performance of a task carried out in the public interest or Art. 6.1.f about legitimate interest (see above under "Legal basis for the processing").

There may be conditions or limitations on these rights. Limitations e.g. apply to the right of access if the request is manifestly unfounded or excessive, if granting the request adversely affects the rights and freedoms of others, or if essential considerations of private interests apply.

You can make use of your rights by sending an email to contact@impactfund.dk.

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