

PRIVACY POLICY FOR WHISTLEBLOWER SCHEME

Copenhagen Business School

This Privacy Policy explains how Copenhagen Business School ("CBS", "we", "us") processes your personal information regarding a report to the Whistleblower Scheme.

Below is a description of the personal data processing that takes place and what rights you have as an employee, if a report is made about you through the Whistleblower Scheme, as well as your rights if you use the Whistleblower Scheme to make a report about another person.

Reference is also made to the separate guidelines and process descriptions for the Whistleblower Scheme, including information about who can make a report and who can be reported.

This policy only concerns the handling and the investigation of a report made to the Whistleblower Scheme and this policy must therefore be seen in connection with the HR-privacy policy and other relevant policies and procedures in regard to employees.

1 DATA CONTROLLER

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

Copenhagen Business School

CVR-number: 19596915

Solbjerg Plads 3

2000 Frederiksberg

E-mail: cbs@cbs.dk

Telephone number: 3815 3815

Contact information on our Data Protection Officer:

Jesper Smedegaard Madsen

Department: CBS Legal

E-mail: dpo@cbs.dk

Telephone number: 3815 2117

2 DESCRIPTION OF THE PROCESSING

Purpose	Categories of personal data	Sources	Legal basis for the processing	Recipients	Data retention
<p>Handling and investigation of a report to the Whistleblower Scheme regarding:</p> <ul style="list-style-type: none"> the person who is reported 	<p>We can process the following categories of personal data about you:</p> <p>Ordinary personal data:</p> <ul style="list-style-type: none"> Name, email address, telephone number Other information which are included in the report <p>Sensitive information and information about offenses or possible offenses may be included in the processing.</p>	<p>We can collect your personal data from the following source(s) - equalling the group of people who has access to use the Whistleblower Scheme:</p> <ul style="list-style-type: none"> Employees Members of the board Members of the executive board Suppliers Collaborators Accountants Lawyers Students Citizens 	<p>We process your personal data on the following legal bases:</p> <ul style="list-style-type: none"> Article 6.1.e (necessary for the performance of a task carried out in the public interest or in the exercise of official authority) Article 9.2.g (necessary for reasons of substantial public interest) Section 8 of the Danish Data Protection Act for information about criminal matters or criminal convictions Section 11 of the Danish Data Protection Act for information about national identification number 	<p>We can share your personal information with:</p> <ul style="list-style-type: none"> Plesner Advokatpartnerselskab IT-suppliers External counsellors The police Public authorities 	<p>We will retain personal data processed for this purpose for as long as it is necessary for the purposes listed.</p> <ul style="list-style-type: none"> The data is retained for as long as the investigation is in progress. The retention period depends on the outcome of the investigation. If the report falls outside the whistleblower scheme, but does not appear to be unfounded, the information is disclosed to the General Counsel, Mette Kuhlen Gullach, where they are processed as described in the Personal Administration Privacy Policy. If a report is filed 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. If, on the basis of the information collected, a disciplinary penalty is imposed against the reported person or there are reasons for the fact that it is reasonable and necessary to keep the information of the person reported, the information is kept in the employee's

					<p>staff folder and deleted in accordance with the policy for employee data.</p> <ul style="list-style-type: none"> • Due to the fact that CBS is covered by the Act on Public Access to Documents on Public Files, the data is retained until the case has been submitted to the Danish National Archives. • If the report turns out to be groundless, the data will be deleted within 6 months after the finding that the report was deemed to be unfounded. • In other situations it is specifically assessed whether there are any reasonable reasons to retain the data and if so for how long.
<p>Handling and examination of reports to the whistleblower scheme regarding:</p> <ul style="list-style-type: none"> • the person who has made the report <p>This purpose does not include the processing of the reported information in relation to the reported person - see above.</p> <p>If there is a suspicion that there is a deliberate false reporting, this purpose also includes investigations in relation to the reporting person in such situations.</p>	<p>We can process the following categories of personal data about you under the condition that you choose not to make an anonymous report:</p> <p>Ordinary personal data:</p> <ul style="list-style-type: none"> • Name, email address, telephone number, • The content of your report • Additional information from the persons mentioned under "Sources" in cases where 	<p>We can collect your personal data from the following sources:</p> <ul style="list-style-type: none"> • Employees • Members of the board • Members of the executive board • Suppliers • Collaborators • Accountants • Lawyers • Students • Citizens 	<p>We process your personal data on the following legal bases:</p> <ul style="list-style-type: none"> • Article 6.1.e (necessary for the performance of a task carried out in the public interest or in the exercise of official authority) • Article 9.2.g (necessary for reasons of substantial public interest) • Section 8 of the Danish Data Protection Act for information about criminal matters or criminal convictions. • Section 11 of the Danish Data Protection Act for information about national identification number. 	<p>We can share your personal information with:</p> <ul style="list-style-type: none"> • Plesner Advokatpartnerselskab • IT-suppliers • External counsellors • The police • Public authorities 	<p>We will retain personal data processed for this purpose for as long as it is necessary for the purposes listed.</p> <ul style="list-style-type: none"> • The data is retained for as long as the investigation is in progress. The retention period depends on the outcome of the investigation. • If the report falls outside the whistleblower scheme, but does not appear to be unfounded, the information is disclosed to the General Counsel, Mette Kuhlen Gullach, where they are processed as described in the Personal Administration Privacy Policy. • If a report is filed 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. • If, on the basis of the information collected, a disciplinary penalty is imposed against the reported person or there are reasons for the fact that it is

	<p>there is a suspicion that a deliberate false report has been made.</p> <p>As a rule, no sensitive information and information about offenses and convictions about you are handled as part of the handling of the Whistleblower report - unless you choose to provide such information about yourself in the report.</p> <p>However, information about offenses or possible offenses may be included in the processing if there is a suspicion that a deliberate false report has been made.</p>				<p>reasonable and necessary to keep the information of the person reported, the information is kept in the employee's staff folder.</p> <ul style="list-style-type: none"> • Due to the fact that CBS is covered by the Act on Public Access to Documents on Public Files, the data is retained until the case has been submitted to the Danish National Archives. • If the report turns out to be groundless, the data will be deleted within 6 months after the finding that the report was deemed to be unfounded. • In other situations it is specifically assessed whether there are any reasonable reasons to retain the data and if so for how long.
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3 INFORMATION TO THE REPORTED EMPLOYEE AND RETRACTION

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

- The identity of the person(s) that are responsible for the investigation of the report
- A description of the accusation(s)
- Who have seen the report

As mentioned below in the section about your rights, you have the right to gain access to the report that has been submitted about you. In this connection, you have the right to request disclosure of the identity of the person who has submitted the report, if the identity of the reporter is known.

If it is concluded that the report was deliberately false, you will be informed about the identity of the person, who has made the report about you, if the identity of the reporter is known.

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

4 CONSEQUENCES OF THE PROCESSING

A report to or an investigation of a report to the Whistleblower Scheme may have significant consequences for the reported person, as a report concerns violation or suspected violations of the legislation, as the scheme is further delimited in the separate guidelines and process description of the scheme.

Corresponding, a report to the Whistleblower Scheme may have significant consequences for the person who has made the report in case of a deliberate false report. Such cases may have criminal consequences.

5 TRANSFERS TO COUNTRIES OUTSIDE THE EU/EEA

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

6 YOUR 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.
- In particular, you have an unconditional right to object to the processing of your personal data for direct marketing purposes.
- If processing of your personal information is based on your consent, you have the right to withdraw your consent at any time. Your withdrawal will not affect the lawfulness of the processing carried out before you withdrew your consent.
- You have the right to receive your personal information 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.

There may be conditions or limitations on these rights. Therefore, it is not certain that you for instance have the right of deletion of your personal data in the specific case - this depends on the specific circumstances of the processing activity.

You can take steps to exercise your rights by contacting CBS Legal at legal@cbs.dk.

7 RIGHT TO COURT HEARING

If employment proceedings are taken against you as a result of a report and subsequent investigation, you are entitled to bring the matter before the court.

8 QUESTIONS

If you have any questions regarding this policy feel free to contact CBS Legal at legal@cbs.dk.

Last updated: 19 October 2018