



PRIVACY NOTICE

Version 4.0, 27-06-2024

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Our Privacy Notice aims to inform you on how Compliance Partners collects your personal data. Your personal data is defined as all information relating to you as an identifiable person. The legal basis for this Privacy Notice is the requirements set out in the General Data Protection Regulation (GDPR)¹. You can read more about how we collect personal data in each specific situation on the following pages.

DEFINITIONS

- **“Applicants”**. Shall mean the persons who submit applications for positions as employees or freelancers.
- **“Suppliers”**. Shall mean different suppliers of certain services or products.
- **“Partners”**. Shall mean companies that Compliance Partners have a partnership with, that is, e.g., our regional law partners.
- **“Prospects”**. Shall cover the potential business customers that are contacted with offers regarding Compliance Partners services.
- **“Whistleblowers”**. Shall mean the persons who submit information on potential breaches under the Whistleblower Directive.

1. WE ARE DATA CONTROLLERS – HERE IS OUR CONTACT INFORMATION

This Privacy Notice is provided by the following entities, which together is referred to as ‘Compliance Partners’ in this Privacy Notice:

¹ GDPR Articles 13 and 14. [Regulation \(EU\) 2016/679 of the European Parliament and the Council of 27-04-2016, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data.](#)



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Compliance Partners ApS, Compliance Partners Nordic ApS, Compliance Partners Software ApS

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Kultorvet 11, 4th,
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Whistleblower Partners GmbH
Reg. No. 43615661
Pappelalle 78-79,
10437 Berlin,
Germany

Data Protection Officer (DPO)
Michael Erlitz
mer@compliancepartners.com

Compliance Partners are data controllers when you use and interact with our products and services and when we receive your personal data from third parties, as we are determining the purpose of your personal data. However, when we are hosting cloud platforms, e.g., the Whistle Portal or providing our GDPR Solution, we are considered to be data processors.

2. WITH THAT PURPOSES DO WE COLLECT YOUR DATA?

The following section describes the purposes of our collection and processing of your personal data.

If we need to process your personal data for another purpose that goes beyond the purposes listed below, then we will contact you before the processing. However, if you are a person concerned in a report, you will not be contacted, due to the special confidentiality requirements in the Whistleblower Directive².

² [Directive \(EU\) 2019/1937 of the European Parliament and the Council of 23-10-2019, on the protection of persons who report breaches of EU law.](#)

2.1 WHISTLEBLOWER SYSTEM

If you submit a report on a breach of the law through the Whistle Portal, if there has been referred to you, as a person to whom a breach is attributed, or if you have been mentioned in a report, we process your personal data. We process personal data about the manager(s) and employees of our customers, including persons authorized to receive reports. The source of information is the report itself, and if you are authorized to receive reports, from you or senior employees in your firm. We use your personal data for the following purposes:

- to acknowledge receipt of the reports,
- to create logins to access the Whistle Portal,
- to exchange information and give feedback on the reports,
- to advise business customers on the processing of the reports,
- to transmit the case for further processing,
- to keep a register of the reports.

2.2 BUSINESS ADMINISTRATION & ECONOMICS

If you as a manager or an employee, on behalf of your employer (our customer), or as a self-employed, has subscribed to the provision of our services or products, we process your personal data. The same applies to our customers' reference persons, if such is provided. We also process your personal data if you are one of the above-mentioned at our suppliers or partners. We use your personal data for the following purposes:

- to send you non-promotional communication (e.g. information about the purchased services and products, access to software, contracts, and invoicing),
- for the administration of the contract,
- for the administration of payments and invoicing,
- for the accounting purposes,
- in case of a conflict, to defend legal claims.



2.3 APPLICANTS

If applicants (unsolicited or solicited) submit an application for a position as an employee or a freelancer via e-mail, our website, or our LinkedIn-page, we will collect your personal data for the following purposes:

- to perform tests and surveys,
- to make hiring decisions,
- to store applications.

2.4 WEBSITE

When you visit our website one of our suppliers will collect your personal data for us (tracking). Our website also stores cookies on your web browsers. When you via the website ask to book a demonstration or to be contacted, we collect personal data from you. Therefore, we collect your personal data for the following purposes:

- to register your visit,
- to send you promotional communication tailored to you,
- to enable you to participate in surveys, campaigns, competitions, webinars, and events,
- to make data analysis, user analysis, and user segmentation (profiling),
- to store cookies on your web browsers,
- to create a booking of a demonstration,
- to send you non-promotional communication.

You can read more about our use of cookies under Cookies on our [website](#).

2.5 NEWSLETTERS

When you via our website subscribe to our newsletters, we will process your personal data for the following purposes:



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- to send you newsletters,
- to enable you to participate in surveys, campaigns, competitions, webinars, and events.

2.6 SOCIAL MEDIA

When you interact with us via our social media accounts, we will collect personal data from you. Furthermore, the social media platforms we use make general statistics available to page owners about the subscribers. We might use your personal data when you have interacted with our social media accounts for the following purposes:

- to send you promotional communication tailored to you,
- to share content on our social media accounts.

However, when you use the social media platforms where we are available, it is the platforms that are data controllers, and therefore, responsible for your personal data.

LinkedIn Ireland UnLtd., Wilton Plaza, Dublin, Ireland – LinkedIn Privacy Notice Meta Platforms Ireland Ltd., 4 Grand Canal Square, Dublin, Ireland – Facebook Privacy Notice
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2.7 SALES & MARKETING

When our suppliers forward your personal data to us, and we contact you with the purpose of sales, we process your personal data. We will also process your personal data for sales and marketing purposes if you are listed as a reference person for one of our customers. We might use your personal data for the following purposes:

- to call you with the aim of sales (direct marketing),
- to send you promotional communication tailored to you,



- to manage the customer relationship (CRM),
- to register the communication.

3. WHICH CATEGORIES OF PERSONAL DATA DO WE COLLECT?

We collect different types of personal data, which depends on which categories of people you belong to. We operate with three categories of personal data, including general personal data, special categories of personal data, and other categories of personal data. The following sections give you information about which types of personal data we might collect about you.

3.1 WHISTLEBLOWER SYSTEM

As a whistleblower or a person being mentioned in a report, the categories of personal data collected depend on the content of the report. Therefore, the categories of personal data related to the content of the reports listed below are based on assumptions as to what a report can contain. As a reporting person, you can also choose to submit the report as an anonym, and if you do so, we can only identify you with an identification number, besides what you disclose in the report.

General Personal Data

Profile Data

- First and Last Name
- Address
- Birth Data
- E-mail Address
- Tel. No.

Employment Data

- Employment

- Certifications.

Private Data

- Housing
- Relationships
- Children
- Social Problems.

Financial Data

- Taxes
- Bank Information.

Technical Data

- Preferences
- Pictures
- Behavioural Data
- IP-Address
- Location



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- Absence
- Education.
- Economics
- Wages.
- Accounts
- Settings.

Special Categories of Personal Data

- Racial Origin
- Ethnic Origin
- Political Opinions
- Religious Beliefs
- Philosophical Beliefs
- Trade Union Membership
- Genetics
- Biometrics
- Health
- Sex Life
- Sexual Orientation.

Other Categories of Personal Data

- Criminal Offences
- Civil Reg. No., including CPR. No.

3.2 BUSINESS ADMINISTRATION & ECONOMICS

General Personal Data

Profile Data

- First and Last Name
- E-mail Address
- Tel. No.

Employment Data

- Employment
- Absence.

Financial Data

- Bank Information.

Technical Data

- Preferences
- Pictures
- Accounts
- Settings.

3.3 APPLICANTS

As an applicant, the categories of personal data collected depend on the content of the documents provided, e.g., your resume, application, and/or recommendation. Therefore, the categories of personal data related to the content of the provided documents are based on assumptions as to what these can contain.



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General Personal Data

Profile Data

- First and Last Name
- Address
- Birth Data
- E-mail Address
- Tel. No.

Employment Data

- Employment

- Absence
- Education
- Certifications.

Private Data

- Housing
- Relationships
- Children
- Social Problems.

Technical Data

- Preferences
- Pictures.

Other Categories of Personal Data

- Civil Reg. No., including CPR. No.

3.4 WEBSITE, NEWSLETTERS, SOCIAL MEDIA, SALES & MARKETING

General Personal Data

Profile Data

- First and Last Name
- E-mail Address
- Tel. No.

Employment Data

- Employment.

Technical Data

- Preferences
- Pictures
- Behavioural Data
- IP-Address
- Location.

- Accounts
- Settings.

4. THIS IS THE LEGAL BASIS FOR OUR COLLECTION OF PERSONAL DATA

It is a general rule that the collection of personal data must have a lawful basis. The following section gives you insight into the legal basis of the collection of your personal data.



4.1 WHISTLEBLOWER SYSTEM

General Personal Data

When we collect your general personal data the legal basis for the collection is our legal obligation in Member State law and the performance of a task carried out in the public interest.

✓ GDPR Article 6 (1)(c) and (e)

Special Categories of Data

When we collect special categories of personal data the legal basis for the collection is that processing is necessary for reasons of substantial public interest on the basis of Member State law.

✓ GDPR Article 9 (2)(g)

Other Categories of Data

When we collect personal data on criminal offenses and civil reg. no. the legal basis for the collection is the authorization given in Member State law.

✓ GDPR Article 10

4.2 BUSINESS ADMINISTRATION & ECONOMICS

General Personal Data

When we collect your general personal data the legal basis for the collection is the conclusion of a contract and the subsequent performance of the contract.

✓ GDPR Article 6 (1)(b)

4.3 APPLICANTS

General Personal Data

When we collect your general personal data the legal basis for the collection is the conclusion of a contract and the subsequent performance of the contract.

✓ GDPR Article 6 (1)(b)

Other Categories of Data

When we collect personal data on civil registration numbers the legal basis for the collection is the authorization given in Member State law.

✓ GDPR Article 10



4.4 WEBSITE, NEWSLETTERS, SOCIAL MEDIA, SALES & MARKETING

General Personal Data

When we collect your general personal data in relation to your subscription to our newsletters and the storage of cookies, the legal basis for the collection is based on your consent.

✓ GDPR Article 6 (1)(a)

When we collect your personal data in relation to your visit to our website, sales contact, and the storage of critical cookies the legal basis for the processing is our legitimate interest.

✓ GDPR Article 6 (1)(f)

What does legitimate interest mean?

When we process your personal data with the purposes of direct marketing after personal data provided by our suppliers, our legitimate interests consist of providing you with relevant marketing material that provides you opportunities to secure compliance with relevant legislation with our products and services. When we collect your personal data with the purpose of storage of cookies, our legitimate interests are to ensure the functioning of the website.

5. WHO IS YOUR DATA BEING SHARED WITH?

We are obligated to inform you with whom we share your personal data. In the following section, you can see who we share your personal data with, and if we share your personal data with third parties outside of the European Union (EU)/Economic Area (EEA). There are special rules, if that is the case, which you also can read more about at the end of the following section.

Whistleblowers

- Your personal data will only be shared with our authorized staff member(s) designated to screen reports.
 - Should we need to disclose your personal data to other persons than our authorized staff member(s), we will obtain your prior consent.
- ✓ Whistleblower Directive Article 16 (1-3)



✓ No transfers outside of the EEA

Persons Mentioned in a Report

- We might share your personal data with the authorized staff member(s) designated to receive reports in your firm, the management of your firm, our regional law partners, and public authorities.
- ✓ GDPR Article 6 (1)(c) and (e), Article 9(2)(g), and Article 10
- ✓ No transfers outside of the EEA

Manager(s), Employees, and Reference Persons of Customers, Suppliers & Partners

- We might share your personal data with our other suppliers or partners in the areas of business administration, economics, IT, and sales and marketing.
- ✓ GDPR Article 6 (1)(b)

Applicants

- Your personal data will be shared with our suppliers.
- ✓ GDPR Article 6(1)(f)
- ✓ No transfers outside of the EEA

Website Visitors, Subscribers to Newsletters, Social Media Subscribers & Prospects

- We might share your personal data with our suppliers in the area of IT and sales and marketing.
- ✓ GDPR Article 6 (1)(a) and (f)

5.1 ARE PERSONAL DATA TRANSFERRED TO THIRD COUNTRIES?

Personal data collected on the manager(s), employees, and reference persons of customers, website visitors, subscribers to newsletters, and prospects of sales might be shared with our suppliers outside of the EEA. The suppliers in question are based in England and the United States of America. The legal basis of the transfers to England is the adequate decision of the EU Commission. The legal basis of the transfers to our suppliers in the United States of America is the standard data



protection clauses adopted in the data processing agreements and the EU-U.S. Privacy Shield-arrangement.

6. HOW LONG IS YOUR DATA STORED?

As a general rule, personal data can be stored until it is not relevant for the purposes for which it is collected. Depending on which categories of persons you belong to, you can see for how long we retain your personal data in this section.

Whistleblowers & Persons Concerned in a Report

- We delete your personal data if we have transferred the report to our legal partners or the public authorities.
 - When the report has been closed, and a low chance of it being relevant again.
 - If the report does not make sense AT ALL or is TOTALLY unfounded.
 - Maximum 10 (ten) years after receipt.
- The retention period is based on the requirements for registration in the Whistleblower Directive and the statute of limitations on economic and property crimes in the criminal acts of Member States.

Business Administration & Economics

- We retain your general personal data for a period of 3 (three) years after the termination of a contract.
 - We retain financial data for a period of 5 (five) years after the termination of a contract.
- The retention periods are based on the statute of limitations on payment claims and accounting rules in the laws of Member States.

Applicants

- We delete your personal data if the decision to not hire the applicant is made, and the applicant has not consented to further storage.
- The retention period is based on the requirements in the Danish Data Supervisory Authority's Guidelines.

Website Visitors, Subscribers to Newsletters, Social Media Subscribers & Prospects



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- We retain your general personal data in relation to website visitors for a period of 12 (twelve) months after you visit our website.
 - We retain your general personal data in relation to the storage of cookies depending on the data retention policies of the suppliers.
 - We retain subscribers to newsletters' and prospects' personal data if consent is withdrawn or until it is not relevant for the purposes for which it is collected.
- The retention period is based on the data retention policies of our suppliers.

Regardless of the data retention policies mentioned above, we shall retain your personal data for an extensive period if we are required to do so on the grounds of EU law or the law of a Member State.

7. YOUR RIGHTS & HOW TO EXERCISE THEM

Under the GDPR you have certain rights related to our processing of your personal data. You can choose to exercise these at all times. If you want to exercise your rights, you must contact our DPO Michael Erlitz (mer@compliancepartners.com), or the e-mail (privacy@compliancepartners.com). Your rights consist of:

The right to withdraw your consent. You can always withdraw a consent you have given us to collect or share your personal data.

The right to access. You have the right to get access to the personal data that we are processing about you, alongside some additional information.

The right to rectification. You can request to get your personal data rectified, if the personal data that we have about you is inaccurate.

The right to erasure ('right to be forgotten'). You can request that we delete the processed personal data.



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The right to restriction of the processing. You can request that our processing of your personal data be restricted. That means that we in the future will seek to limit the processing of specific personal data.

The right to data portability. You can ask to receive your personal data in a structured, commonly used, and machine-readable format, and to transmit this personal data to third parties.

The right to object. You have the right to, at any time, object to the processing of your personal data, including for profiling and direct marketing purposes.

The right not to be subject to automatic processing, including profiling. You have the right to demand to not be subject to a decision based solely on automated processing, including profiling.

If you are a person concerned in a report, your access to above-mentioned rights might be limited due to the special confidential requirements in the Whistleblower Directive.

8. IF YOU HAVE QUESTIONS OR WANT TO COMPLAIN TO SUPERVISORY AUTHORITY

If you have questions regarding our protection of your data, please contact us on e-mail (privacy@compliancepartners.com) or our DPO Michael Erlitz (mer@compliancepartners.com). We will return to you without undue delay.

You have to the right to file a complaint with the Danish Data Supervisory Authority (DSSA) if you are unsatisfied with the processing of your personal data. You can read more about how to file a complaint at their [website](#).

The Danish Data Supervisory Authority Carl Jacobsens Vej 35, 2500 Valby, Denmark
