

ADDvise Group Whistleblowing Privacy Notice

Last reviewed: October 2024.

1. INTRODUCTION

We at ADDvise Group are committed to operating fairly and upholding high standards of ethics. On this page, we describe and provide further information on how we will collect and process personal data of reporting persons and other persons concerned in connection with whistleblowing matters.

It is important to us that you feel safe with how we handle your personal data. We take measures to ensure that your personal data is protected and that the processing of your personal data is carried out in accordance with applicable data protection regulations and our internal policies and procedures.

2. DEFINITIONS

- **GDPR** means the General Data Protection Regulation (EU) 2016/679.
- **Person concerned** is an individual who is referred to in the whistleblowing report as a person to whom a breach is attributed or with whom that person is associated.
- **Personal data** means any information, which may, directly or indirectly, be used to identify an individual.
- **Processing** means everything we do with your personal data (normally by digital means), such as collection, compilation, disclosure, structuring, storage, etc.
- **Reporting channel** means our channel for reporting whistleblowing matters, which is available here: <https://www.addvisegroup.com/about-addvise/whistleblowing/>.
- **Reporting person** is an individual who reports any breaches through our reporting channel.

3. WHO IS RESPONSIBLE FOR THE USE OF YOUR PERSONAL DATA?

Joint controllers

The relevant ADDvise company which the whistleblowing matter concerns and ADDvise Group AB (publ) (“**ADDvise Group**”, “**ADDvise**”, “**we**”, “**our**”, “**us**”) are jointly responsible (joint controllers) when processing your personal data as further described below in our [detailed information on our use of personal data](#). By way of example, this is the case when receiving and investigating whistleblowing reports, following-up and communicating with the reporting person as well as when addressing reported matters.

Where a whistleblowing matter only concerns ADDvise Group AB (publ), the said company will, however, act as an independent controller for the processing of personal data (and not a joint controller as referred to above).

The relevant ADDvise companies have set up internal arrangements to determine their respective responsibilities in relation to the use of your personal data.

You have the right to obtain the essence of the above-mentioned arrangements, in which case we ask you to contact us on the contact details set out in Section 10 below. This information also reflects the essence of the internal arrangement.

Independent controllers

Moreover, as indicated in our [detailed information on our use of personal data](#), each ADDvise company will also process personal data under this privacy notice as an independent controller for certain purposes.

Further information

In [Appendix 1](#) to this privacy notice, you find a list with names and contact details of all ADDvise companies that are subject to this privacy notice.

4. WHICH PERSONAL DATA DO WE COLLECT?

To the extent necessary and depending on the circumstances in each case, we collect and process the following categories of personal data:

- **Identity information.** Information that makes it possible to identify an individual, for example name or personal identification number.
- **Contact information.** Information that makes it possible to contact an individual, for example address, e-mail address and telephone number.
- **Employment information.** Information regarding an employment, e.g. current position, employment type, period and tasks.
- **Profile information.** Information regarding a profile, e.g. gender, age, title, department, marital status and otherwise details of the relationship to us.
- **Communication.** Contents of communication with us, e.g. as part of our follow-up with you in a reported matter.
- **Matter details.** Information necessary in each case to investigate a whistleblowing report, e.g. obtained from the submitted report.
- **Audio material.** Recorded statements from you on a whistleblowing matter, if you have chosen to submit a report orally to us.

As a reporting person you have the possibility to report anonymously, in which case none of your personal data that directly identifies you will be processed by us.

5. FROM WHERE DO WE COLLECT PERSONAL DATA?

We collect personal data from the following sources:

- **Reporter.** We collect personal data that the reporting person provides to us when submitting a whistleblowing report, either in writing or orally, and in connection with further communication with the reporting person following submission of the report.
- **Authorities and public records.** We collect personal data from authorities and public records where necessary, for example to investigate a whistleblowing report.
- **Other employees, external persons and/or companies.** We may also collect personal data from other employees, external persons and/or companies where necessary to investigate a whistleblowing report. An external person may for example be an individual of a supplier who provides us input for the investigation. An external company may for example be a company

that we engage to help us in the investigation or to take measures due to the whistleblowing report.

6. WHY DO WE USE YOUR PERSONAL DATA?

To read more about which categories of personal data, which legal basis that we rely on for the use of your personal data for each purpose and for how long your personal data is stored as well as which companies that are joint or separate controllers for the respective processing, please see our [detailed information on our use of personal data](#).

7. WHICH RECIPIENTS DO WE SHARE PERSONAL DATA WITH?

Other data controllers

Depending on the situation, we will share your personal data with various recipients. The recipients are responsible (data controllers) for their own use of your personal data, unless we have stated otherwise.

To read more about why and based on which legal bases that we share your personal data with different recipients, please see our [detailed information on our use of personal data](#).

Service providers (processors)

We share personal data with service providers that we have engaged. These service providers provide, for example, IT services (such as hosting and operating of IT services). When these service providers process personal data on our behalf, they act as data processors for us, and we are responsible for the processing of your personal data. They must not use your personal data for their own purposes and are contractually and legally obliged to protect your personal data.

8. WHICH RIGHTS DO YOU HAVE?

You have the following rights in relation to your personal data under the GDPR:

- Access to and receive a copy of your personal data (Article 15).
- Rectify or supplement your personal data (Article 16).
- Withdraw your consent to a processing of your personal data (Article 7).
- Delete your personal data (Article 17).
- Object to a processing of your personal data (Article 21).
- Restrict a processing of your personal data (Article 18).
- Obtain a copy of your personal data and have your personal data transferred to an external recipient (data portability) (Article 20).

Automated decision-making, including profiling

We do not carry out any automated decision-making or profiling which have any legal effects or similar on you.

Right to lodge a complaint

You have the right to lodge a complaint with your supervisory authority. Contact details to the data protection authorities in the EU/EEA can be found [here](#).

9. WHERE WE PROCESS PERSONAL DATA

We store, as a main rule, your personal data within the EU/EEA area. However, in certain cases we transfer your personal data to recipients established in third countries outside the EU/EEA, for example to service providers which we engage in such third country.

To ensure an essentially equivalent level of protection for your personal data when transferred (or otherwise made available) to service providers in third countries outside of the EU/EEA which do not provide an adequate level of protection, we normally use the EU Commission's adopted [standard contractual clauses for international transfers](#) according to decision 2021/914 and implement.

We also rely upon adequacy decisions by the EU Commission where personal data is transferred to countries and recipients covered by such decision (i.e. when the EU Commission has decided that such country and/or recipient provides an adequate protection for personal data).

10. ANY QUESTIONS?

If you have any questions about this privacy notice, how we use your personal data or if you wish to exercise your rights, please contact us as follows:

ADDvise Group AB (publ), company reg. no. 556363-2115
Grev Turegatan 30
114 38 Stockholm, Sweden
legal@addvisigroup.se

You may also contact the relevant ADDvise company that processes your personal data as a controller. The contact details to each ADDvise company can be found in Appendix 1 to this privacy notice.

Detailed information on our use of personal data

Why and how we use personal data

Please find below detailed information regarding our use of personal data, including the categories of personal data used, the legal basis for the use and for how long the personal data is stored.

Joint controllers

Receive and investigate whistleblowing reports, including communicating with the reporting person

What we do: We use, to the extent necessary, your personal data to manage reports submitted in our reporting channel in accordance with applicable laws. This includes to receive and investigate reports, as well as to be in contact with and report back to the reporting person on actions taken.

<i>Categories of personal data:</i>	<i>Legal basis:</i>	<i>External recipients:</i>
<ul style="list-style-type: none"> • Identity information • Contact details • Employment information • Matter details • Communication • Audio material • Profile information 	<p><i>Legitimate interest (Article 6.1(f) of the GDPR).</i> The processing is necessary to satisfy our legitimate interest in receiving, investigating and assessing reports, as well as ensuring necessary follow-up and provide feedback to the reporting person.</p> <p>Any information on criminal offences, including suspected criminal offences, as well as special categories of personal data (such as trade union membership and health data) is processed where necessary to establish, exercise and defend legal claims in relation to a reported breach.</p>	<ul style="list-style-type: none"> • Group companies • Reporting person

Storage period: Personal data is stored for this purpose during the period of managing the reported matter and up to two (2) years from when the matter was closed.

Data controller: The relevant ADDvise company which the whistleblowing matter concerns and ADDvise Group AB (publ) are jointly responsible (joint controllers) for the processing of your personal data for this purpose.

Make business decisions and take other actions as a result of whistleblowing reports

What we do: We use your personal data to make business decisions and take other actions following a whistleblowing report. By way of example, this may include to carry out legal investigations and take disciplinary actions in relation to employees, such as written warnings, and suspensions and terminating contracts.

<i>Categories of personal data:</i>	<i>Legal basis:</i>	<i>External recipients:</i>
<ul style="list-style-type: none"> • Identity information • Contact details • Employment information • Matter details • Communication • Audio material • Profile information 	<p><i>Legitimate interest (Article 6.1(f) of the GDPR).</i> The processing is necessary to satisfy our legitimate interest in addressing reported breaches, including making business decisions and taking other actions as a result of a report.</p> <p>Any information on criminal offences, including suspected criminal offences, as well as special categories of personal data (such as trade union</p>	<ul style="list-style-type: none"> • Group companies • Trade unions • Relevant authorities • External advisors

membership and health data) is processed where necessary to establish, exercise and defend legal claims in relation to a reported breach.

Storage period: Personal data is stored for this purpose during the period of managing the reported matter and up to two (2) years from when the matter was closed.

Data controller: The relevant ADDvise company which the whistleblowing matter concerns and ADDvise Group AB (publ) are jointly responsible (joint controllers) for the processing of your personal data for this purpose.

Manage and defend legal claims

What we do: We will, where necessary, use your personal data to manage and defend legal claims in relation to a reported whistleblowing matter, including using reports as evidence in legal proceedings and other disputes.

Categories of personal data:	Legal basis:	External recipients:
<ul style="list-style-type: none"> • Identity information • Contact details • Employment information • Matter details • Communication • Audio material • Profile information 	<p>Legitimate interest (Article 6.1(f) of the GDPR). The processing is necessary to satisfy our legitimate interest in managing and defending legal claims in relation to a reported whistleblowing matter, including using reports as evidence in legal proceedings and disputes.</p> <p>Any information on criminal offences, including suspected criminal offences, as well as special categories of personal data (such as trade union membership and health data) is processed where necessary to establish, exercise and defend legal claims in relation to a reported breach.</p>	<ul style="list-style-type: none"> • Group companies • Trade unions • Relevant authorities • External advisors

Storage period: Personal data is stored for this purpose as long as necessary to satisfy our legitimate interest of managing and defending a legal claim, which may vary depending on the nature of the reported matter and dispute.

Data controller: The relevant ADDvise company which the whistleblowing matter concerns and ADDvise Group AB (publ) are jointly responsible (joint controllers) for the processing of your personal data for this purpose.

Follow up and evaluate whistleblowing matters (statistics)

What we do: We use your personal data to follow up and evaluate whistleblowing reports, for example to compile reports and statistics on an aggregated level (i.e. information that cannot be directly related to you) to better understand our business and identify any trends regarding whistleblowing matters (such as the number of matters and types of reported matters).

Categories of personal data:	Legal basis:	External recipients:
<ul style="list-style-type: none"> • Identity information • Contact details • Employment information • Matter details • Communication • Audio material • Profile information 	<p>Legitimate interest (Article 6.1(f) of the GDPR). The processing is necessary in order to satisfy our legitimate interest in following up and evaluating whistleblowing matters.</p> <p>When personal data is processed for statistical purposes, we will rely on</p>	<ul style="list-style-type: none"> • Group companies

the same legal basis as the initial processing.

Please note that we will not process any special categories of personal data or information regarding criminal offences for this purpose.

Storage period: Statistics and reports on an aggregated level which cannot directly be related to you are normally stored until further notice.

Data controller: The relevant ADDvise company which the whistleblowing matter concerns and ADDvise Group AB (publ) are jointly responsible (joint controllers) for the processing of your personal data for this purpose.

Separate controllers

Ensure technical functionality and security

What we do: We use your personal data to ensure necessary technical functionality and security of the reporting channel and our IT systems, for example for security logging, error handling, and backups.

<i>Categories of personal data:</i>	<i>Legal basis:</i>	<i>External recipients:</i>
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<i>All personal data above as necessary.</i>	<i>Legal obligation (Article 6.1(c) of the GDPR).</i> The processing is necessary in order to fulfil each party's obligations under the GDPR of ensuring appropriate technical functionality and security of relevant IT systems.	
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Without processing your personal data for this purpose, the respective party would not be able to provide you a safe and functioning IT infrastructure in accordance with the GDPR.

Storage period: Personal data is stored for the same period as stated in relation to each relevant purpose of the processing.

Data controller: The relevant ADDvise company which the legal obligation applies to is responsible (independent controller) for its own processing of personal data for this purpose.

Fulfil data protection obligations

What we do: We will use your personal data to fulfil our legal obligations, for example in order to comply with data protection obligations under the GDPR (such as requests to exercise your rights).

<i>Categories of personal data:</i>	<i>Legal basis:</i>	<i>External recipients:</i>
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<i>All personal data above as necessary.</i>	<i>Legal obligation (Article 6.1(c) of the GDPR).</i> The processing is necessary in order to fulfil legal obligations that each party is subject to, for example responding to requests from you concerning your rights under the GDPR.	
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- Relevant authorities

Any information on criminal offences, including suspected criminal

offences, is processed where necessary to fulfil the legal obligation.

Storage period: Personal data is stored for the period necessary to fulfil each legal obligation that we are subject to.

Data controller: The relevant ADDvise company which the legal obligation applies to is responsible (independent controller) for its own processing of personal data for this purpose.

Respond to legal requests

What we do: We process your personal data to respond to legal requests from authorities, for example law enforcement, tax authorities or any other authorities.

Categories of personal data:	Legal basis:	External recipients:
All categories of personal data as necessary to respond to and evaluate the request in each case.	Legal obligation (Article 6.1(c) of the GDPR). The processing of your personal data is necessary to fulfil our legal obligations.	<ul style="list-style-type: none"> Relevant authorities
	Legitimate interest (Article 6.1 f) of the GDPR). If there is no explicit legal obligation requiring that we respond to the legal request, but we consider that we and the public authority have a legitimate interest (which outweighs your privacy interest), we rely on this legitimate interest for the use of your personal data for this purpose.	
	Any information on criminal offences, including suspected criminal offences, is processed where necessary to fulfil the legal obligation.	

Storage period: Personal data is stored for this purpose for the period that is necessary to respond to the specific legal request and thereafter for the period as necessary to document the request and our response to the request.

Data controller: The relevant ADDvise company which the legal request applies to is responsible (independent controller) for its own processing of personal data for this purpose.

Manage transfers and restructuring of all or parts of the business

What we do: If all or parts of the business would be transferred or restructured, we process your personal data where necessary for this purpose. Should the business be transferred to a new shareholder, your personal data would also be transferred and disclosed to the shareholder. The new shareholder would in such case be responsible (data controller) for your personal data and the processing that takes place for the same purposes as stated in this privacy notice, unless you receive any other information in connection with the transfer.

Categories of personal data:	Legal basis:	External recipients:
Relevant categories of personal data as are necessary to manage the transfer or restructuring of all or parts of the business in each case.	Legitimate interest (Article 6.1 (f) of the GDPR). The processing of your personal data is necessary to satisfy our legitimate interest of managing a transfer or restructuring of all or parts of the business.	<ul style="list-style-type: none"> Investors/shareholders Potential investors/shareholders External advisors Group companies Relevant authorities

It is our assessment that our legitimate interest outweighs your interest of not having your personal data processed for this purpose if the new shareholder carries out the same or similar type of business that we do.

Special categories of personal data (such as trade union membership and health data) is disclosed for the same purpose and where necessary to fulfil obligations and exercise rights within the field of employment (Article 9.2(b) of the GDPR).

Storage period: Personal data is stored for this purpose for the period that is necessary to manage the transfer or the restructuring.

Data controller: The relevant ADDvise company which the activity concerns is responsible (independent controller) for its own processing of personal data for this purpose.

Appendix 1 – ADDvise companies subject to this privacy notice

In the below list you find names and contact details of the ADDvise companies which are subject to this privacy notice.

<i>ADDvise company</i>	<i>Postal address</i>	<i>E-mail address</i>
<i>ADDvise Group AB (publ)</i> Company reg. no. 556363-2115	Grev Turegatan 30 114 38 Stockholm, Sweden	legal@addvisigroup.se
<i>ADDvise Midco AB</i> Company reg. no. 556287-5467	Grev Turegatan 30 114 38 Stockholm, Sweden	legal@addvisigroup.se
<i>ADDvise Newco Lab AB</i> Company reg. no. 559428-8630	Grev Turegatan 30 114 38 Stockholm, Sweden	legal@addvisigroup.se
<i>ADDvise Newco Med AB</i> Company reg. no. 556624-5212	Grev Turegatan 30 114 38 Stockholm, Sweden	legal@addvisigroup.se
<i>MRC Engineering and Fabrication S.L.U.</i> Company reg. no. B-937076777	Travesia Carlos Mackintosh, 3 - A 5 29602 Marbella, Spain	samuel@mrc-cleanrooms.com
<i>Sonesta Medical AB</i> Company reg. no. 556233-0257	Industrivägen 7 171 48 Solna, Sweden	personuppgiftsansvarig@sonesta.se
<i>Sonar OY</i> Company reg. no. 2353862-0	P.O. Box 5, FI-02201 Espoo, Finland	sonar@sonar.fi
<i>Aktiebolaget Germa</i> Company reg. no. 556086-9413	Industrigatan 54 291 36 Kristianstad, Sweden	privacyofficer@germa.se
<i>Seebreath AB</i> Company reg. no. 556830-3043	Birger Jarlsgatan 2 114 34 Stockholm	support@seebreath.com
<i>CliniChain Holding B.V.</i> Company reg. no. 36245097	Televisieweg 62, 1322 AM Almere, the Netherlands	info@clinichain.com
<i>Hettich Labinstrument AB</i> Company reg. no. 556482-6039	Tegeluddsvägen 76 115 28 Stockholm	personuppgiftsansvarig@hettichlabinstrument.se
<i>ADDvise Tillquist AB</i> Company reg. no. 556652-4467	Renvägen 1 352 45 Växjö	GDPR@tillquist.se
<i>Labrum Aktiebolag</i> Company reg. no. 556196-7257	Industrivägen 7 171 48 Solna	personuppgiftsansvarig@labrum.se
<i>Labplan Ltd</i> Company reg. no. 227451	Allenwood Business Park, Naas Co Kildare W91 A4CP Ireland	info@labplan.ie
<i>Clinichain B.V.</i> Company reg. no. 36257699	Televisieweg 62, 1322 AM Almere, the Netherlands	info@clinichain.com
<i>Labrum Klimat OY</i> Company reg. no. 2357819-8	Industrivägen 7 171 48 Solna	personuppgiftsansvarig@labrum.se

Labrum AS
Company reg. no. 887 838 062

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brum.se