



WHISTLEBLOWER PRIVACY NOTICE

This Privacy Notice explains how A.P. Møller Capital P/S and its relevant branch, subsidiaries, and affiliates (together, "A.P. Møller Capital", "we", "us" or "our") process personal data in connection with reports submitted through our whistleblower scheme and any related assessment, investigation or follow-up.

Data controller

A.P. Møller Capital P/S will normally be the data controller responsible for the processing of personal data under this Privacy Notice. Where a report relates to another A.P. Møller Capital entity, or where another A.P. Møller Capital entity processes personal data for its own purposes in connection with the report, that entity may also be a controller.

A.P. Møller Capital P/S
Tuborg Havnevej 15
2900 Hellerup
Denmark
CVR no. 38 28 49 67

Contact

For questions about this Privacy Notice or the processing of personal data, please contact:

A.P. Møller Capital P/S
Tuborg Havnevej 15
2900 Hellerup
Denmark
CVR no. 38 28 49 67
privacy@apmollercapital.com

How we use personal data

We collect and process personal data to receive, assess and follow up on whistleblower reports, communicate with reporting persons where relevant, investigate concerns, protect individuals and the business, take appropriate remedial or disciplinary action where necessary, comply with legal and regulatory obligations, establish, exercise or defend legal claims, and maintain appropriate records.

Categories of personal data

Depending on the relevant report and the circumstances, we may collect and process the following categories of personal data, where the information relates to an identified or identifiable individual:

- Where provided, identity and contact information about the reporting person, such as name, contact details, role and relationship with A.P. Møller Capital
- Information about persons mentioned in or affected by the report, such as name, role, contact details, employment or business relationship, alleged conduct, investigation findings and related follow-up
- Information contained in the report and supporting materials, to the extent it relates to an identified or identifiable individual

- Information generated during the assessment, investigation and follow-up of a report, such as interview notes, investigation findings, decisions, remedial actions and correspondence, to the extent it relates to an identified or identifiable individual
- System-generated case information, such as the case number, date and time of submission and secure post box correspondence, excluding IP addresses, machine IDs and cookies

Special category personal data and criminal offence data

Reports may include special category personal data, criminal offence data or other sensitive information, depending on the nature of the report and the persons involved. We will only process such data where required or permitted by applicable law and where there is an appropriate legal basis and any additional condition or safeguard required under applicable law.

Sources

We normally collect personal data from the person submitting the report and from the information included in the report. We may also collect personal data from persons mentioned in or affected by the report, employees or other individuals involved in the matter, A.P. Moller Capital entities, affiliates, service providers and vendors, advisers, auditors, regulators, authorities, public sources or other third parties, where relevant and required or permitted by applicable law.

Legal basis

Depending on the relevant A.P. Moller Capital entity, jurisdiction and processing activity, the data protection laws that may apply include the EU General Data Protection Regulation ("GDPR"), the Danish Data Protection Act ("DDPA" or "Databeskyttelsesloven"), DIFC Law No. 5 of 2020 – Data Protection Law ("DPL"), the ADGM Data Protection Regulations 2021 ("DPR"), Moroccan Law No. 09-08 relating to the protection of individuals with regard to the processing of personal data, and the Singapore Personal Data Protection Act 2012 ("PDPA"), in each case as amended from time to time.

The legal basis for processing personal data will usually be one or more of the following, depending on the relevant processing activity and the entity involved:

- compliance with legal and regulatory obligations, including obligations relating to whistleblowing, financial services, employment, governance, investigations, reporting and recordkeeping;
- our legitimate interests in receiving, assessing and investigating concerns, ensuring that our business is conducted lawfully and ethically, protecting individuals and the business, preventing and detecting misconduct, taking appropriate follow-up action, and managing related legal, regulatory, governance and business risks; and
- establishment, exercise or defence of legal claims, where relevant.

Confidentiality and anonymity

Reports are handled confidentially. Access to reports is restricted to persons who need access in order to receive, assess, investigate or follow up on the report, or where access is otherwise required or permitted by law.

The whistleblower scheme allows reports to be made anonymously. It is optional to make either an anonymous report or a report containing personal data. If you choose not to remain anonymous, your identity will be known to the persons who handle the case and may be used when assessing, investigating and following up on the report, including in connection with any legal, regulatory, disciplinary or court proceedings.

If you report anonymously, A.P. Moller Capital will not seek to identify you unless this is necessary and permitted by law. However, anonymity may be compromised if the information you provide identifies you directly or indirectly. This also applies if you have chosen to remain anonymous but provide information from which you can directly or indirectly be identified.

If a report is made from a computer on the A.P. Moller Capital network, there is a risk that visited webpages may be logged in the browser history or in A.P. Moller Capital logs. This risk can be reduced by submitting the report from a computer or network that is not connected to the A.P. Moller Capital network.

The reporting system does not log IP addresses or machine IDs and does not use cookies. Reports are registered in the system with the content of the report and the date and time of submission.

If you upload documents, you should be aware that documents may contain metadata that could identify you. You should remove identifying metadata before uploading documents if you wish to remain anonymous.

If you create a secure post box in the reporting system, you can use your case number and password to communicate securely about the report and provide corrections or additional information. If you do not provide contact details or create a secure post box, we may not be able to contact you for further information or provide follow-up through the reporting system.

Use of service providers and disclosure of personal data

We use service providers and vendors to support the whistleblower scheme and related business operations. The whistleblower reporting system is provided by EQS Group A/S, which acts as a service provider for the reporting platform. We may also use IT and cloud service providers, external legal advisers, auditors and other professional advisers where relevant.

Personal data contained in or relating to a whistleblower report may be disclosed to relevant A.P. Moller Capital group entities, external advisers, auditors, regulators, authorities, courts, law enforcement bodies or other third parties where necessary for the handling of the report, legal or regulatory compliance, or the establishment, exercise or defence of legal claims.

Transfers to countries outside the relevant jurisdiction

During the handling of a whistleblower report, we may transfer personal data to countries outside the jurisdiction in which it was originally collected, including the United Arab Emirates (including DIFC and ADGM), Morocco and Singapore. Such transfers will only take place where necessary for the purposes described in this Privacy Notice, subject to applicable confidentiality requirements, and where appropriate safeguards or other valid transfer mechanisms are in place under applicable data protection law.

Where we receive a request for disclosure from a public authority, law enforcement body or regulator, we will assess the request in accordance with applicable data protection laws and applicable whistleblowing confidentiality requirements.

Where required, transfers will be protected by an adequacy decision or equivalent recognition, standard contractual clauses or equivalent safeguards, an intra-group data sharing arrangement, or another lawful transfer mechanism recognised under applicable law.

You may request further information about the relevant transfer mechanism by contacting us at privacy@apmollercapital.com.

Retention and deletion of personal data

We retain personal data for as long as necessary for the purposes described in this Privacy Notice and in accordance with applicable legal, regulatory and internal retention requirements.

Reports that are clearly outside the scope of the whistleblower scheme or are manifestly unfounded will be deleted or anonymised when they are no longer required, unless retention is required or permitted by applicable law.

Personal data relating to reports that are investigated will be retained for as long as necessary to assess, investigate and follow up on the report, document decisions and actions taken, comply with legal or regulatory requirements, or establish, exercise or defend legal claims.

Personal data will be deleted or anonymised when it is no longer required for the relevant purpose and the applicable retention period has expired, unless deletion is suspended because of a legal or regulatory hold.

Correction of information

If you realise that you have provided incomplete or incorrect information, you may submit a new report referring to the previous report and explaining what should be corrected. If you created a secure post box, you may also provide corrections or additional information by logging into the system using your case number and password.

Your rights

In relation to our processing of your personal data, you have the right to:

- Request access to your personal data and request that inaccurate personal data be corrected or, where applicable, erased.
- Object to the processing of your personal data and request restriction of processing, where applicable.
- Receive your personal data in a structured, commonly used and machine-readable format and, where applicable, request transmission of that data to another controller (data portability).
- Lodge a complaint with the relevant data protection supervisory authority.

These rights are not absolute and may be subject to conditions, limitations or exemptions under applicable law. In particular, the exercise of rights may be restricted where necessary to protect the confidentiality of the whistleblower process, the rights and freedoms of others, the investigation, legal privilege, legal claims, or legal and regulatory obligations.

Relevant supervisory authorities include:

- A.P. Møller Capital P/S: Danish Data Protection Agency (Datatilsynet), Carl Jacobsens Vej 35, 2500 Valby, telephone number +45 33 19 32 00, email dt@datatilsynet.dk.
- A.P. Møller Capital P/S (DIFC Branch): DIFC Commissioner of Data Protection, The Gate Building, Dubai International Financial Centre, Dubai, United Arab Emirates, telephone +971 4 362 2222, email commissioner@dp.difc.ae. Individuals may also bring claims directly before the DIFC Courts.
- A.P. Møller Capital (ME) Ltd: ADGM Commissioner of Data Protection, ADGM Building, Abu Dhabi Global Market Square, Al Maryah Island, Abu Dhabi, United Arab Emirates, telephone number +971 2 333 8888, email Data.Protection@adgm.com.
- A.P. Møller Capital Morocco S.A.: Commission Nationale de contrôle de la protection des Données à caractère Personnel (CNDP), Avenue Al Arz, Secteur 4, M1, Hay Riad, Rabat, Morocco, telephone number +212 537 57 11 24 / +212 537 57 21 41, email contact@cndp.ma.
- A.P. Møller Capital (Singapore) Pte. Ltd.: Personal Data Protection Commission, 10 Pasir Panjang Road, #03-01 Mapletree Business City, Singapore 117438, telephone +65 6377 3131, [online complaint form](#).

You may exercise your rights by contacting us at privacy@apmollercapital.com.

Further information about the specific legal bases relied on for particular processing activities can be provided on request.

Last updated: 16 July 2026