



Privacy Notice for Whistleblowing Channels

Scope: Heidelberg Materials Northern Europe
Owner: NEUR Legal, Compliance & Corporate Security
Issued: November 2024
Version: 1.0

1 Processing of Personal Data

1.1 Contact details and personal data controller

Each Heidelberg Materials Northern Europe (“**HM NEUR**” or “**we**”/“**us**”) entity is the personal data controller for the personal data processed in its local whistleblowing channels (the “**Whistleblowing Channels**”). You will find contact information to each HM NEUR entity below in [Schedule 1](#).

If you have questions regarding how we process personal data about you, you may contact us as set out in [Schedule 1](#). If you have any objections or complaints about the way we process your personal data, you have the right to file a complaint to the Data Protection Authority in your jurisdiction:

- [Sweden](#): Swedish Authority for Privacy Protection (sw. *Integritetsskyddsmyndigheten*)
- [Denmark](#): Danish Data Protection Agency (dk. *Datatilsynet*)
- [Estonia](#): Estonian Data Protection Inspectorate (ee. *Andmekaitse Inspektsioon*)
- [Latvia](#): Data State Inspectorate (lv. *Datu valsts inspekcija*)
- [Lithuania](#): State Data Protection Inspectorate (lt. *Valstybinė duomenų apsaugos inspekcija*)
- [Norway](#): Norwegian Data Protection Authority (nb. *Datatilsynet*)
- [Iceland](#): Icelandic Data Protection Authority (is. *Persónuvernd*)

1.2 Categories of personal data and data subjects

Whistleblowing reports typically contain personal data, which directly or indirectly pertain to a natural person. The information can be attributable to the person who submits a report, the subject of a report, and to other individuals mentioned in the report, such as witnesses (“**Relevant Person(s)**”).

Personal data that may be processed about Relevant Persons in connection with a report may include name, address, city, gender, nationality or other characteristics of the person relevant to the reported misconduct, roles or functions, contact information (including telephone number), details of the reported event, measures taken, and other types of personal data collected within the scope of the investigation, e.g. interviews but also via e.g. phone records, computer files, audio files, IP-addresses and other technical data, as well as e-mails.

Depending on the nature of the matter, we may also process sensitive personal data about Relevant Persons, such as data about race or ethnic origin, political opinions, religious or philosophical beliefs, union membership and data about health or sex life. When submitting a report, you should avoid disclosing sensitive personal data that is not relevant to the case.

A report can also mean that personal data about violations of law that include suspected or confirmed crimes may be processed.

Information that is not relevant to the processing of a report in an obvious way will be deleted as soon as possible.

1.3 Purposes of processing and legal basis

Personal data is processed primarily for the purpose of processing and investigating a follow-up case. Personal data processed for this purpose may also be processed for the purpose of fulfilling a disclosure that; (i) is necessary in order to take action in connection with what has emerged in a matter; (ii) is necessary for

reports to be used as evidence in legal proceedings; and (iii) is in accordance with applicable laws and regulations.

The legal basis for the processing of personal data is our legal obligation to provide a Whistleblowing Channel in accordance with national¹ implementing legislation of the EU Whistleblowing Directive (the “**Whistleblowing Acts**”).

As described above, we may, depending on the nature of the case, also process sensitive personal data. The legal basis for our processing of sensitive personal data is that the processing is necessary in the interests of an important public interest, on the basis of Union law or the national legislation of the Member States. In some cases, we may also process sensitive personal data when it is necessary for us to be able to fulfil our obligations and exercise our special rights within areas of labour law, social security and social protection.

We may also process personal data on violations of the law that include suspected or confirmed crimes. Such processing is necessary to fulfil our legal obligation to provide a whistleblowing channel in accordance with the Whistleblowing Acts.

We may in some cases also process personal data in order to take action in connection with a report. We then rely on our legitimate interest in processing personal data in order to be able to take action in connection with the report. To the extent that sensitive personal data or data on breaches of the law need to be processed, this is done on the grounds that it is necessary to establish, assert or defend a legal claim.

1.4 Retention period

The personal data will only be stored by us for as long as necessary to investigate a report and take relevant measures in relation to the result of such investigation. Personal data that occurs in a follow-up matter is never processed for longer than two years (5 years for Lithuania) after the matter is closed. Superfluous personal data and personal data that is not relevant to the reported event will be deleted or anonymized as soon as possible.

Personal data processed to establish, assert or defend a legal claim will be stored until the legal proceedings are completed and during the subsequent limitation period.

1.5 Third party transfers

Data that emerges from a report and in a follow-up matter will be treated with the greatest possible confidentiality, and will not be disclosed to more persons than is necessary with regard to the purposes of the processing.

In order to fulfil the purposes of the processing of personal data, the personal data may however be transferred to other Heidelberg Material companies and third parties, such as external legal advisers, accounting firms, forensic investigation companies or other service providers that are necessary to detect, investigate and rectify serious breaches. We may also share personal data with police authorities and/or other relevant authorities, regulators or courts to safeguard our interests or exercise our rights.

¹ Sweden, Norway, Denmark, Estonia, Latvia, Lithuania and Iceland.

If third parties act as personal data processors for us for the personal data processing in question, we will enter into the necessary personal data agreements with such third parties.

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

1.6 Data subjects' rights

If we receive a report which includes your personal data or if your personal data is collected within the scope of an investigation, we will provide you with information thereof.

You will be notified as soon as possible after an initial investigation has taken place and all relevant evidence is secured. In this connection, you will receive information about:

- The identity of the person(s) who is/ are responsible for the investigation of the report.
- A description of the contents of the report.

You may have a right of access to the report that was submitted about you. Please see below about your general GDPR rights. However, your right to access to the report may be limited in accordance with the Whistleblowing Acts.

You are further entitled to know what personal data we are processing about you, and you can request a copy of such data. Please note that to the extent that the disclosure of your personal data may compromise an investigation, we may not be able to meet your request. You are entitled to have incorrect personal data about you rectified, and in some cases you may request that we delete your personal data. You are also entitled to object to certain processing of your personal data, and request that the processing of your personal data should be restricted.

2 Version history

Date	Version	Author	Overview of changes
November 2024	1.0	NEUR Legal, Compliance and Corporate Security	Document Created

Schedule 1 – Authorized persons

The following persons have been appointed by the respective companies in the HM NEUR as authorized persons in accordance with the Whistleblowing Acts. Authorized persons are, on behalf of each specified HM NEUR, authorized to receive reports, follow up on what has been reported and have contact with and provide feedback to reporting individuals.

1 Sweden

Company	Contact information to personal data controller
Heidelberg Materials Sweden AB (556000-6057)	victor.ask@heidelbergmaterials.com +46 72 143 54 72 Marieviksgatan 25, Box 47055, 117 43 Stockholm
Heidelberg Materials Cement Sverige AB (556013-5864)	info@cementa.se , +46 72 143 54 72 Box 47210, 100 74 Stockholm.
Heidelberg Materials Betong Sverige AB (556188-3892)	info@betongindustri.se , +46 72 143 54 72 Marieviksgatan 25, 100 74 Stockholm.
Heidelberg Materials Precast Abetong AB (556055-7356)	info@abetong.se , +46 72 143 54 72 Box 24, 351 03 Växjö.
Heidelberg Materials Precast Contiga AB (556270-5979)	info@contiga.se , +46 72 143 54 72 Box 94, 761 21 Norrtälje.
Heidelberg Materials Ballast Sverige AB (556016-1183)	info@jehander.se , +46 72 143 54 72 Box 47124, 100 74 Stockholm.

2 Norway

Company	Contact information to personal data controller
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Heidelberg Materials Norway AS (980910369)	victor.ask@heidelbergmaterials.com +46 72 143 54 72 Lilleakerveien 2A, 0283 OSLO
Heidelberg Materials Sement Norge AS (934949145)	victor.ask@heidelbergmaterials.com +46 72 143 54 72 Lilleakerveien 2A, 0283 OSLO
Heidelberg Materials Tilslag Norge AS (918414304)	victor.ask@heidelbergmaterials.com +46 72 143 54 72 Vassbotnen 1, 4313 SANDNES
Heidelberg Materials Betong Norge AS (934468740)	victor.ask@heidelbergmaterials.com +46 72 143 54 72 Lilleakerveien 2A, 0283 OSLO
Heidelberg Materials Prefab Norge AS (971507837)	victor.ask@heidelbergmaterials.com +46 72 143 54 72 Peer Gynts vei 1, 1535 MOSS
Mibau Stema Norge AS (958990022)	victor.ask@heidelbergmaterials.com +46 72 143 54 72 Jelsavegen 512, 4234 JELSA

3 Iceland

Company	Contact information to personal data controller
BM Vallá ehf (450510-0680)	victor.ask@heidelbergmaterials.com +46 72 143 54 72 Breiðhöfða 3 110 Reykjavík 412 5000

4 Denmark

Company	Contact information to personal data controller
Heidelberg Materials Beton Danmark A/S (29189137)	victor.ask@heidelbergmaterials.com +46 72 143 54 72

	Fredensvej 40, 4100 Ringsted
Heidelberg Materials Precast Denmark A/S (33255047)	victor.ask@heidelbergmaterials.com +46 72 143 54 72 Mads Clausens Vej 58, 6360 Tinglev

5 Estonia

Company	Contact information to personal data controller
Heidelberg Materials Kunda AS (1015677)	victor.ask@heidelbergmaterials.com +46 72 143 54 72 Jaama 2, 44106 Kunda

6 Latvia

Company	Contact information to personal data controller
Heidelberg Materials SBC Latvia SIA (40003709915)	victor.ask@heidelbergmaterials.com +46 72 143 54 72 Zeltiņu iela 130 LV-2167 Mārupe, Mārupes

7 Lithuania

Company	Contact information to personal data controller
UAB Heidelberg Materials Lietuva Betonai (304102190)	victor.ask@heidelbergmaterials.com +46 72 143 54 72 Technikos g. 7K, Kaunas.