

Krüger's Privacy Policy

January 2023

1. PREAMBLE

Krüger A/S is strongly committed to the protection of personal data, which it intends to place at the core of its concerns.

This Privacy Policy is intended to inform any natural person concerned (employees or candidates, customers, suppliers or partners and their employees) of the measures thus implemented when Krüger A/S collects personal data in the course of its activities. It is likely to evolve according to needs, due to the legal context, in or within the European Union, as well as the recommendations or decisions of Datatilsynet in Denmark.

This policy applies only to Krüger A/S.

2. DATA COLLECTED, PURPOSES OF PROCESSING AND ROLE OF THE DPO

Krüger A/S has set up within the company an organization responsible for the proper application of and compliance with this Privacy Policy, under the control of the CEO of Krüger A/S.

In addition, Krüger A/S takes measures to make its employees aware of the need to protect personal data so that collection or processing takes place only if it is necessary for the purposes intended and if these purposes are defined to guarantee their lawful, determined, explicit and legitimate nature.

The processing operations carried out by Krüger A/S and containing personal data are the subject of a detailed description form integrated into the "processing register" maintained by the Data Protection Officer (DPO).

The Krüger A/S DPO thus ensures that the collection and processing of personal data is in compliance with:

- > Regulation (EU) 2016/679 of the Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (GDPR)

By placing the DPO of Krüger A/S under the authority of the CEO of Krüger A/S, Krüger A/S wanted to guarantee his independence and place the protection of personal data at the heart of the company's organizational structure.

3. GOLDEN RULES

Krüger A/S relies on seven golden rules to ensure that each person who collects and processes personal data:

- > respects the GDPR by ensuring that personal data are collected, used and shared in a way that respects

the rights of the data subjects and the concept of "privacy by design" for data protection from the moment the processing is conceived;

- > is transparent and clear with the data subjects on the purposes of the intended processing operation, on the reason for and modalities of its implementation, and on the recipients with whom such data may be shared;
- > seeks the consent of the natural persons concerned whenever possible and acts without their consent only in cases provided for in the GDPR or the law or where their prior consultation is impossible or presents a particular risk;
- > seeks advice in case of doubt about how to process personal data, exchanges with other specialists, seeks legal advice or collects the opinion of the competent regulatory authority and keeps a record of their decisions;
- > makes the decision to collect, use or share personal data taking into account the interest of the natural person to process only the necessary, relevant, adequate, proportionate, fair, timely and secure data, for a period limited to the needs of the processing;
- > ensures that personal data are shared only with those to whom access is necessary to provide the expected service and achieve the purpose of the processing;
- > ensures that security measures proportionate to the risks have been taken to preserve the availability, confidentiality, and integrity of the processing operations.

4. INFORMATION OF DATA SUBJECTS

In accordance with the GDPR, Krüger A/S is committed to informing the natural persons concerned of the rights guaranteed to them by notifying each of them:

- > the identity of the data controller;
- > the purpose of the data processing;
- > the mandatory or optional nature of the answers and the possible consequences of a failure to reply;
- > the recipient of their data;
- > their right to access, query, modify and rectify information concerning them, their right to object for legitimate reasons, their right to object to the use of their personal data for commercial prospecting purposes and their right to define instructions on the processing of their personal data after their death;
- > the retention time of the categories of data processed.

5. GROUP PROCESSINGS

Krüger A/S informs the data subjects that the personal data concerned by the processing operations listed in its register may be made accessible to the internal audit department, the compliance department or the DPO, the statutory auditors, the persons in charge of processing reports of conduct that violates the group's ethical rules, as well as to its lawyers or competent authorities and, in certain cases, to the parties involved in a merger or acquisition project.

6. DATA RECIPIENTS

Krüger A/S may share the personal data collected with people within Veolia Group or with its data processors, service providers or suppliers, only to the extent necessary to perform the tasks entrusted to them.

Krüger A/S ensures that its data processors, service providers and partners act in compliance with applicable laws and regulations regarding the protection of personal data, but also that they pay particular attention to the confidentiality of such data.

7. DATA RETENTION

The processing of personal data collected by or on behalf of Krüger A/S is stored by Krüger A/S or its service providers, including on cloud storage platforms.

For mainly technical reasons or reasons related to the international dimension of Krüger A/S, some data may thus be stored or accessed outside the European Union or the European Economic Area (EEA). In this case, Krüger A/S shall ensure that measures are put in place to ensure a level of personal data protection compatible with the requirements of the GDPR, in particular through rigorous and appropriate physical, technical, organizational and procedural measures to ensure the availability, confidentiality and integrity of personal data by adjusting them according to the nature and sensitivity of the data concerned.

Krüger A/S strives to limit the retention time for the personal data for the time necessary for the operations for which they were collected and processed, in compliance with the applicable regulations. Personal data are then irreversibly deleted or anonymized.

8. SECURITY AND ALERTS

Krüger A/S takes measures to ensure that the security of the personal data it processes is adapted to the sensitivity of the data and the risks associated with it. To this end, the IT teams concerned or their data processors implement the requirements of Veolia's cybersecurity policy, in particular those relating to:

- > identification of cyber risks,
- > implementation of appropriate network protections, via filtering devices,
- > maintaining the various infrastructure and application components in a secure state, including applying security updates and upgrading components to avoid the use of components without maintenance,
- > regular verification of infrastructure or application vulnerabilities through monitoring and the use of technical or application vulnerability scanners,

- > encryption of data at standby when necessary and in transit,
- > use of security best practices when developing applications,
- > assignment of user rights respecting the rule of the minimum privilege and the right to know about it,
- > access protection through the implementation of strong authentication mechanisms, the use of SSO (Single Sign On) based on the Veolia group's digital identity referential and regular review of accounts,
- > supervision of the security of personal data and applications accessing it, in particular through centralization and use of logs,
- > preservation of evidence of the implementation of the above measures.

In the event of a breach of the personal data it holds, Krüger A/S shall react without delay as soon as it becomes aware of the event in order to, on the one hand, inform Datatilsynet in Denmark and, if necessary, the persons concerned and, on the other hand, identify the failures and put in place appropriate security measures.

9. DATA SUBJECT RIGHTS

In accordance with the GDPR natural persons whose personal data are collected have a right of access, modification, if necessary portability, as well as a right to forget about the personal data concerning them.

They also have a right to object to the processing of their personal data for legitimate reasons and the right to define general and specific guidelines concerning the fate of their data after their death.

To exercise these rights, any person concerned by a processing operation containing personal data may contact in writing the person in charge of the processing operation within Krüger A/S whose identity has been brought to their attention at the time of collection or to their DPO by sending an email to the following address: GDPR@kruger.dk

10. CONTACT

For any requests for information regarding our privacy policy, you can write to the DPO of Krüger A/S GDPR@kruger.dk.