

Inwido Group Whistleblowing Privacy Notice

Updated: March 2026

1. INTRODUCTION

We at Inwido Group are committed to operating fairly and upholding high standards of ethics. Here 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. Directive 2019/1937 on the protection of persons who report breaches of Union law (the “**Whistleblowing Directive**”) and local laws implementing the Whistleblowing Directive (the “**Whistleblowing Act**”) e.g. includes provisions on establishment of internal reporting channels.

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 channels for reporting whistleblowing matters, which are available here: <https://report.whistleb.com/sv/portal/inwido>
- **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 Inwido company which the whistleblowing matter concerns and Inwido AB (publ) (“**Inwido Group**”, “**Inwido**”, “**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 Inwido 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 Inwido 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 Inwido 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 Inwido 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 or contractor relation, e.g. current position, contract 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, e.g. as part of our follow-up with you on a reported matter.
Matter details. Information necessary in each case to investigate and otherwise handle and follow up on a whistleblowing 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).

Restrictions to data subjects' rights

In cases where a copy (containing your personal data) also includes personal data relating to other individuals, we may redact such personal data. This will be done in order to safeguard the privacy of those individuals, pursuant to Article 15(4) of the GDPR.

Furthermore, Chapter 5, Section 1 of the Act (2018:218) containing supplementary provisions to the EU General Data Protection Regulation (the Swedish Data Protection Act) provides that Articles 13 –15 of the GDPR concerning information and the right of access to personal data do not apply to such data that the data controller is prohibited from disclosing to the data subject under law or other statutory instrument, or pursuant to a decision issued on the basis of such instrument. Under the aforementioned provision, it also follows that where the data controller is not a public authority, the exemption also applies to data which, if held by a public authority, would have been subject to confidentiality under the Public Access to Information and Secrecy Act (2009:400) (the Secrecy Act).

Pursuant to Chapter 32, Section 3 b of the Secrecy Act confidentiality applies, inter alia, in a follow-up matter under the Whistleblowing Act (*lag (2021:890) om skydd för personer som rapporterar om missförhållanden*) to information that may reveal the identity of the reporting person, and to information that may reveal the identity of another private individual, unless it is clear that the information may be disclosed without the individual suffering harm or detriment.

Furthermore, pursuant to Chapter 17, Section 3 b of the Secrecy Act, confidentiality applies in a follow-up matter to information that may reveal the identity of a private individual other than the reporting person, if it may be assumed that the purpose of the follow-up would be undermined should the information be disclosed.

Chapter 5, Section 2 of the Swedish Data Protection Act further provides that Article 15 of the GDPR does not apply to personal data contained in running text which had not assumed its final form at the time the request was made, or which constitutes a memorandum or similar note. However, this exemption does not apply where the personal data has been disclosed to a third party, is processed solely for archiving purposes in the public interest or for statistical purposes, or, has been processed for more than one year in running text that has not assumed its final form.

The above means that your normal data subject rights may be restricted or not applicable at all, depending on the circumstances.

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, namely the United Kingdom.

We rely upon the adequacy decisions by the EU Commission where personal data is transferred to the United Kingdom.

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:

Inwido AB (publ), company reg. no. 556633-3828
Engelbrektsgatan 15
211 33 Malmö, Sweden
privacy@inwido.com

You may also contact the relevant Inwido company that processes your personal data as a controller. The contact details to each Inwido 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 channels in accordance with applicable laws. This for example includes to receive, follow up and investigate reports, as well as to be in contact with and report back to the reporting person.

<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>The Inwido company which the report concerns</i></p> <p><u><i>If the company employ 50 or more employees</i></u></p> <p><i>Legal obligation (Article 6.1 c) of the GDPR). The processing is necessary to fulfil legal obligations under the Whistleblowing Act.</i></p> <p>Any information on 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, or, as regards criminal offences to meet legal obligations.</p> <p><u><i>If the company employ less than 50 employees</i></u></p> <p><i>Legitimate interest (Article 6.1(f) of the GDPR). 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.</i></p> <p>Any information on 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</p>	<ul style="list-style-type: none"> • Group companies • Reporting person

and defend legal claims in relation to a reported breach.

Inwido AB

Legitimate interest (Article 6.1(f) of the GDPR). The processing is necessary to satisfy Inwido AB’s and the relevant group company’s legitimate interest to procure Inwido AB’s assistance in receiving, investigating and assessing reports, as well as ensuring necessary follow-up and provide feedback to the reporting person.

Any information on 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.

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 Inwido company which the whistleblowing matter concerns and Inwido AB (publ) are jointly responsible (joint controllers) for the processing of your personal data for this purpose.

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

What we do: We use your personal data to make 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 and other involved individuals, such as written warnings, suspensions and terminating contracts.

Categories of personal data:

- Identity information
- Contact details
- Employment information
- Matter details
- Communication
- Audio material
- Profile information

Legal basis:

The Inwido company which the report concerns

Legitimate interest (Article 6.1(f) of the GDPR). The processing is necessary to satisfy the relevant group company’s legitimate interest to make decisions and take other actions following a whistleblowing report, including e.g. carrying out legal investigations and taking disciplinary actions.

Any information on 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

External recipients:

- Group companies
- Trade unions
- Employer organisations
- Relevant authorities
- External advisors

and defend legal claims in relation to a reported breach.

Inwido AB (publ)

Legitimate interest (Article 6.1(f) of the GDPR). The processing is necessary to satisfy Inwido AB's and the relevant group company's legitimate interest to procure Inwido AB's assistance to make decisions and take other actions following a whistleblowing report, including e.g. carrying out legal investigations and taking disciplinary actions.

Any information on 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.

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 Inwido company which the whistleblowing matter concerns and Inwido AB (publ) are jointly responsible (joint controllers) for the processing of your personal data for this purpose.

Establish, exercise and defend legal claims

What we do: We will, where necessary, use your personal data to establish, exercise and defend legal claims in relation to a reported whistleblowing matter, including using reports as evidence in legal proceedings and other disputes and to fulfil submission of information (*Sw: Uppgiftslämnande*).

<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>The Inwido company which the report concerns</i></p> <p><i>Legitimate interest (Article 6.1(f) of the GDPR).</i> The processing is necessary to satisfy our legitimate interest in establishing, exercising and defending legal claims in relation to a reported whistleblowing matter, including using reports as evidence in legal proceedings and disputes and to fulfil submission of information.</p> <p>Any information on criminal offences, as well as special categories of personal data (such as trade union membership and health data) is processed</p>	<ul style="list-style-type: none"> • Group companies • Trade unions • Employer organisations • Counter parties • Relevant authorities (such as the police, prosecutors and courts) • External advisors

where necessary to establish, exercise and defend legal claims in relation to a reported breach.

Inwido AB (publ)

Legitimate interest (Article 6.1(f) of the GDPR). The processing is necessary to satisfy Inwido AB's and the relevant group company's legitimate interest to procure Inwido AB's assistance in exercising, establishing and defending legal claims in relation to a reported whistleblowing matter, including using reports as evidence in legal proceedings and disputes and to fulfil submission of information.

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.

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, but normally until the relevant period of limitation has past or the there is a final judgment which is not possible to appeal.

Data controller: The relevant Inwido company which the whistleblowing matter concerns and Inwido 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 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:

- Identity information
- Contact details
- Employment information
- Matter details
- Communication
- Audio material
- Profile information

Legal basis:

The Inwido company which the report concerns

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.

When personal data is processed for statistical purposes, we will rely on the same legal basis as the initial processing.

External recipients:

- Group companies

Inwido AB (publ)

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.

When personal data is processed for statistical purposes, we will rely on the same legal basis as the initial processing.

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 Inwido company which the whistleblowing matter concerns and Inwido 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>
<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. 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.	<ul style="list-style-type: none"> • Group companies

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 Inwido 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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All personal data above as necessary.

Legal obligation (Article 6.1(c) of the GDPR). 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.

- Relevant authorities (such as the Data Protection Authority and courts)

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 Inwido 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.

- 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 Inwido 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.

Categories of personal data:

Relevant categories of personal data as are necessary to manage the transfer or restructuring of all or parts of the business in each case.

Legal basis:

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.

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.

External recipients:

- Investors/shareholders
- Potential investors/shareholders
- New owners of the assets of our business
- External advisors
- Group companies
- Relevant authorities

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 Inwido company which the activity concerns is responsible (independent controller) for its own processing of personal data for this purpose.

Appendix 1 – Inwido companies subject to this privacy notice

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

Inwido company	Org. number	Postal address
Inwido AB	556633-3828	Engelbrektgatan 15, 211 33 Malmö, Sweden
Outrup Vinduer Og Døre A/S	72 38 12 11	Outrupstræde 36, 7900 Nykøbing Mors, Denmark
KPK Døre og Vinduer A/S	15 64 61 01	Rogalandsvej 3, 7900 Nykøbing M, Denmark
Outline Vinduer A/S	29 18 91 10	Fabriksvej 4, 9640 Farsø, Denmark
Pihla Group OY	1882624-9	Konikuja 7, 85800 Haapajärvi, Finland
Profin OY	2461589-4	Tulotie 2, 93100 Pudasjärvi, Finland
Metallityö Välimäki Oy	0545266-3	Pikkukorventie 14, 37150 Nokia, Finland
AJM okna-vrata-senčila d.o.o	5391610000	Kozjak nad Pesnico 2A, 2211 Pesnica pri Mariboru, Slovenia
JABS Group A/S	37 41 62 58	Kratholmvej 27B, 5260 Odense S, Denmark
Lyssand Frekhaug AS	988381063	Ulsmågveien 7, 5224 Nesttun, Norway
A-lackering AB	556120-8827	Box 142, 576 23 Sävsjö, Sweden
Alakiernia Sp.zo.o	220169272	ul. Bolesława Krzywoustego 1, 84-300 Łęborg, Poland
Elitfönster AB	556007-3073	Box 153, S-574 22 Vetlanda, Sweden
Diplomat Dörrar AB	556606-8234	Tallvägen 30, 564 35 Bankeryd, Sweden
Westcoast Windows AB	556528-1200	Kardanvägen 42, 461 38 Trollhättan, Sweden
Allan Brothers Ltd	5829849	Allan House, Ord Road, Berwick-upon-Tweed, TD15 2 XU, UK
CWG Choices Ltd	5686121	Pywell Road, Willowbrook Industrial Estate, Corby, Northamptonshire, NN17 5XJ, UK
Dekko Window Systems Ltd	5686121	DEKKO HOUSE, MARGARET STREET, ASHTON UNDER LYNE, OL7 0QQ, UK
Sidey Solutions Ltd	9613925	71-75 Shelton Street, Covent Garden, London, WC2H 9JQ, UK
Walker Profiles Ltd	SC173084	57 Feus Road, Perth PH1 2AX, UK
Victorian House Window Group Ltd	7259617	Victorian House, Capel Hendre Business Park, Capel Hendre, Ammanford, SA18 3FA, UK
UAB WinBas	111775687	Žalgirio str. 90, Vilnius, LT-09303, Lithuania
Frovin Vinduer og Døre A/S	20 89 44 31	Rogalandsvej 3, 7900 Nykøbing Mors, Denmark
Bøjsø Døre & Vinduer A/S	12 22 44 94	Højagervej 5-7, 6623 Vorbasse, Denmark
Klas 1 Yhtiöt OY	0981161-9	Nissinjokimutka 2, 93600 Kuusamo, Finland
Hyvinkään Puuseppien Oy	0940027-0	Lukonmäentie 26, 05950 Hyvinkää, Finland
Artic-Kaihdin Oy	3434551-7	Linjatie 14, 80140 Joensuu, Finland
Sydänpuu Ikkunat Oy	2581890-9	Yrittäjätie 8, 19650 JOUTSA, Finland
Carlson and Co Ltd	227444	G11 & G12 Calmount Park Ballymount, Dublin D12 F9P1, Ireland
Sokolka Okna i Drzwi SA	82682	Lotników Lewoniewskich 1, 16-100 Sokółka, Poland
ERA Fönster i Sverige AB	556124-2768	Slottsmöllan 17F, 302 31 Halmstad, Sweden
Hajom Skjutdörrar AB	556304-8098	Kvarnbacken 2, 511 97 Hajom, Sweden
SnickarPer AB	556136-4158	Furuvägen 1 331 94 Värnamo, Sweden
Steelform Scandinavia AB	556372-0142	Värendsgatan 30, 363 45 Lammhult, Sweden
Elitfönster på plats AB	556391-7078	Mogölsvägen 6, 555 93 Jönköping, Sweden
RM Snickerier AB	556335-8679	Södra Industrigatan 8, 598 40 Vimmerby, Sweden
FastFrame (Europe) Ltd	5477831	Amber Drive, Bailey Brook Ind Estate, Langley Mill Nottingham, NG16 4BE, UK