

Trumpet Trust

02 December 2025

Information about the processing of personal data in Trumpet Trust

The processing of personal data and the data controller

Information received through Trumpet Trust may include personal data. The data controller for this processing is Duni AB, reg. no. 556536-7488 (the "**Company**").

This information complements the Company's GDPR-policy.

Please note that Trumpet Trust does not constitute a whistleblowing channel in accordance with the Swedish Whistleblowing Act (SW: Lag (2021:890) om skydd för personer som rapporterar om missförhållanden). If you are part of the Duni Group eligible to use the Company's whistleblowing channel and your report concerns misconduct covered by that channel, you should use it instead of Trumpet Trust. You can access the Company's whistleblowing channel at the following link: <https://dunigroup.trumpet-whistleblowing.eu/>.

Types of personal data and categories of data subjects

The Company processes the following categories of personal data in Trumpet Trust:

- **Reporter details** (if the report is not anonymous): Name, contact details, Trumpet Trust login ID.
- **Information regarding the report**: Description of the case, time, place and description of the incident.
- **Details of the persons mentioned in the report**: Name, function, role and possible connection to the case (e.g. name of the person reported or role in the relevant organization).

The Company processes the aforementioned categories of personal data in Trumpet Trust for the following categories of data subjects:

- The reporter (if the submitted report is not anonymous)
- Person(s) mentioned in the reporter's report

Only personal data that is necessary to process the report and investigate the case is processed. The personal data in Trumpet Trust is deleted as soon as it is no longer necessary for the purpose of the data processing.

The purpose of data processing in Trumpet Trust

The purpose of processing personal data in Trumpet Trust is to detect, investigate, and counteract breaches of trust within or directed at the Company's operations, or any infringements of law, regulation, internal rules, or ethical guidelines applicable to the Company's business partners and suppliers.

The processing aims to identify systemic shortcomings and irregularities within the Company's supply chain or in collaboration with external parties, such as the Company's business partners. It also seeks to identify trust-damaging misconduct involving suppliers and business partners against whom the Company can take action, for example through contractual arrangements or the Company's ethical and sustainability guidelines. To determine whether a particular supplier or business partner is covered by the Company's obligations—and thus can be investigated—reports in Trumpet Trust must be managed, which in turn requires the processing of personal data.

The Company's processing in Trumpet Trust also aims to preserve and reinforce the trust that third parties—such as customers—place in the Company's operations. In addition, Trumpet Trust provides a secure channel for reporting relevant issues. By allowing individuals to submit reports anonymously in Trumpet Trust, the Company ensures that the channel remains safe and confidential. Examples of reportable incidents include conflicts of interest, corruption, money laundering, and risks in the working environment and workplace safety.

Legal basis for personal data processing in Trumpet Trust

The processing of personal data in Trumpet Trust is based on Article 6(1)(f) of the General Data Protection Regulation ("**GDPR**"), which means that the processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party. After conducting a balancing of interests, the Company has assessed that the Company's interest in processing the aforesaid personal data outweighs any potential opposing interests. In such an assessment, the Company has considered in particular the agreements and policies to which the Company's business partners and suppliers are bound and the Company's interest in establishing, exercising or defending any legal claims.

Given the purpose of the processing, it is natural that special categories of personal data (for instance information concerning health or trade union membership)

and/or personal data relating to criminal convictions and offences may be processed in the channel. This processing is carried out on the legal basis that it is necessary for establishing, exercising, or defending legal claims.

Recipients of the personal data

The Company may share personal data with third parties to manage reports in Trumpet Trust. Such third parties act as data processors for the Company, meaning they process personal data on behalf of the Company and in accordance with the Company's instructions. Additionally, the Company may share personal data with third parties that do not act as data processors but are essential for handling reports in Trumpet Trust. In such cases, these external parties operate as independent data controllers.

Your rights as a data subject

The following section outlines the rights you may have regarding the Company's processing of your personal data. To exercise these rights, please contact the Company via the contact details provided below. Any request to exercise the rights must be sent in writing to the address of the Company. In case of doubts about the identity, the Company may request identity documents.

Right of access

You can request to be informed whether the Company is processing personal data relating to you with regards to Trumpet Trust reports and, if so, to be provided with a copy of that data along with further information. In certain circumstances, there may be information about you that you are not permitted to access – for example, if other laws or exceptions prevent certain information from being disclosed.

Right to rectification

If you believe that the personal data concerning you is inaccurate or incomplete, you can request that it be corrected or completed.

Right to object

If the Company cannot demonstrate compelling legitimate grounds to continue processing the data, the Company must cease processing.

Right to restriction

In certain cases, for instance if you have objected to the processing, you have the possibility to request the restriction of the processing of your personal data.

Right to erasure (“right to be forgotten”)

In some cases, you have the right to request that the Company erase personal data concerning you.

Right to data portability

Under certain conditions (including technical feasibility), you may have the right to data portability, i.e. to obtain and transfer your personal data to another controller.

Complaints to the Swedish Authority for Privacy Protection

If you have any complaints regarding the Company's processing of personal data in Trumpet Trust, you have the right to lodge a complaint with the Swedish Authority for Privacy Protection (SW: Integritetsskyddsmyndigheten). For their contact details, please visit www.imy.se.

Contact Information

To submit your enquiries, please write to the Company's data protection representative at gdpr@duni.com.