

Privacy statement for the whistleblowing channel

Controller

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Name of the register

Personal data register

Purpose of processing personal data

The Whistleblowing Directive is based on the European Union Directive on the protection of persons reporting breaches of Union law (EU 2019/1937), adopted on 23.10.2019. The directive obliges companies to provide, among other things, a reliable reporting channel for their employees, which enables reporting misconduct and unethical activities. The processing of personal data is necessary to fulfil the obligations set out in the Directive.

Data content of the register

The personal data register contains personal data of the notifier (data subject) if the notifier has expressly provided them in connection with the notification. The whistleblower may submit the report anonymously and in such a way that the report does not contain personal data concerning him/her. If, exceptionally, the notifier submits his/her own contact details on the notification form, for example, the processing of personal data is based on the consent of the data subject. Such personal data includes first name, last name, email address, telephone number and other personal data provided by the whistleblower. No personal data is collected from those who submit reports, but the whistleblower may include it as part of the report as part of their own information about another person(s) as part of the written report or with the metadata of attachments. Personal data and other data reported in connection with the report will only be processed for the purpose of processing whistleblowing reports. With the help of notifications, the controller takes the necessary measures, the obligations of which stem directly from legislation.

Collection and storage of personal data

The notification data is stored encrypted in the database and is only available to the controller's designated notification processors. Reports are stored for 5 years on server devices that are protected by firewalls and other appropriate technical means and that can only be accessed by designated notification handlers.

The service provider (Finland Chamber of Commerce) acts as a processor of personal data and is responsible for the maintenance of the service, data security, channel settings, and maintains the data of the controller's notification processors and information related to the order. The data processor does not

see any reports submitted to the channel and does not collect any personally identifiable information about the whistleblowers and thus cannot see the identity of the whistleblowers.

Disclosure of data outside the EU and EEA

Personal data is not transferred or processed outside the EU or EEA.

Right of inspection

The data subject (notifier) has access to his or her own data, except where the restriction of access is based on the need to protect the necessary rights of the controller or a third person. This is the case, for example, if access to the data leads to a risk of revealing the identity of the person to be reported.

The data subject also has the opportunity to demand the removal of their own data from the service. It is also possible to restrict this right of the data subject if the purpose of the restriction is to safeguard the controller's legal obligation, in particular the obligation to provide a reliable and impartial reporting channel.