

DATA PROTECTION DESCRIPTION OF HELTTI'S WHISTLEBLOWING NOTIFICATION CHANNEL

Date: 15 November 2023

1 CONTROLLER

Heltti Group: Heltti Oy (2544593-8) or Shortum Oy (2802468-8) ("**Heltti**")

Mannerheimintie 12 A, FI-00100 Helsinki

www.heltti.fi

2 CONTACT PERSON FOR REGISTER QUERIES

Data Protection Manager Juulia Kaipainen

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3 NAME OF THE REGISTER

Heltti's Register of Whistleblowing Notification Channel

4 BASIS AND PURPOSE OF PROCESSING THE PERSONAL DATA

The purpose of processing personal data is to enable Heltti's personnel and stakeholders to securely report any suspicion of misconduct in relation to Heltti's ethical instructions, values or applicable legislation through Heltti's Whistleblowing channel. Personal data may also be processed for reporting purposes as well as for anonymization or deletion of the information.

The grounds for processing personal data are the data subject's consent as well as fulfilling Heltti's legal and ethical obligations and investigating the reported notifications appropriately (among others, the Whistleblowing Act 117/2022 as well as the Whistleblowing Directive (EU) 2019/1937) and also Heltti's justified interest to implement an internal monitoring system and to provide a confidential notification channel, which includes considering also the rights of the persons who may be the subject of a report.

The interests and rights of the whistleblowers as well as the persons being subject of a report are appropriately considered during any investigation and possible intervention of misconduct.

5 REGISTER'S DATA CONTENT

Reports on suspected misconduct or wrongdoings may be submitted by Heltti's personnel as well as stakeholders. In addition to processing the personal data of the whistleblower, Heltti may also process the personal data of persons who may be the subject of a report as well as other persons who may be identifiable from the report, persons who may be included in the investigation of the matter and persons who may act as a witnessing party in the matter. Reports may also be submitted to Heltti's Whistleblowing channel completely anonymously, in which case no personal data will be processed.

Information stored on the data subject may include:

- name, identifying information (e.g. role, office), contact details;
- description of the reported suspicion of misconduct;
- other information possibly included to the report by the whistleblower, e.g. information on the person who is the subject of the report, such as name and office;
- information required to verify the authenticity of the notification and to take necessary measures;
- information compiled and formed in connection with investigations; and
- information regarding the person processing the notification.

Where sensitive personal data is processed, for example, when such processing is unavoidable in order to make, present or defend a legal claim, all processing activities will be in compliance with Finnish as well as EU legislation.

6 STORAGE TIME OF PERSONAL DATA

Heltti will store the personal data of a data subject in Heltti's Register of Whistleblowing Notification Channel only as long as the data is regarded necessary with regard to the purposes of processing described in this data protection description, and there are legitimate grounds for the processing of data, however only up to five years. Personal data may only be stored longer than five years if the processing is required due to implementation of mandatory rights or obligations, criminal or authoritative investigations, for drafting, submitting or defending a legal claim, or for securing the rights of the person being the subject of a report. Unnecessary information will be deleted from the register without undue delay.

7 REGULAR SOURCES OF INFORMATION

Heltti receives personal information primarily from the whistleblowers. Personal information may also be received from persons participating in investigations as well as from persons who may act as a witnessing party in the matter, as needed. Necessary information may also be gathered from Heltti's other personal data registers. Information may also be compiled or formed in the register from information processed during investigations.

8 REGULAR DISCLOSURE AND TRANSFER OF DATA

Personal data may be disclosed to third parties, such as authorities or third party investigators, when it is necessary on the basis of, for example, applicable law.

The Whistleblowing channel is implemented in partnership with a third party service provider (Plan Brothers Oy). Heltti has concluded an agreement with the service provider according to which any personal data received through the notification channel will be processed according to applicable data protection legislation.

9 PRINCIPLES OF PROTECTION

Heltti applies appropriate physical, technical and administrative protection measures to protect the data of the Whistleblowing channel and all persons processing the reports have a confidentiality obligation. If the submitted report is covered by the Whistleblowing Act, the report will only be processed by persons designated in accordance with the Whistleblowing Act. Processing of personal data is only accessible with personal user and access rights.

10 THE DATA SUBJECT'S RIGHT TO PROHIBIT PROCESSING OF PERSONAL DATA AND DIRECT MARKETING

The data subject has the right to

- obtain information on the processing of personal data and access and review their information;
- request the rectification or completion of erroneous or incomplete information;
- request the deletion of their personal data or a restriction on processing the data; and
- object the processing of their personal data on grounds relating to their particular personal reason.

The data subject's right to review their personal data in Heltti's Register of Whistleblowing Notification Channel may be restricted when a report is covered by the Whistleblowing Act, if the restriction is necessary and proportionate for securing the verification of the notification's authenticity or protecting the identity of the whistleblower. In such case the data subject has the right to be informed of the reasons for the restriction and request that all personal data is disclosed to the Data Protection Ombudsman in accordance with section 34, subsections 3 and 4 of the Data Protection Act (1050/2018).

The data subject does not have the right to restrict the processing of personal data when the processing is based on the Whistleblowing Act.

A request regarding the use of the data subject's rights may be sent by e-mail to privacy@heltti.fi. The data subject has the right to make a complaint to the competent supervising authorities (in Finland the Office of the Data Protection Ombudsman), if the data subject regards that the data controller has not followed the applicable data protection regulations in its operations. Instructions on the complaint are described at tietosuojafi.fi.

11 CONTACTS

In all matters related to the processing of personal data and all situations regarding the exercising of one's own rights, the data subject should contact Heltti in MyHeltti service, by e-mail at privacy@heltti.fi, in person at a Heltti service point, or by post at the address: Heltti Oy / Data Protection, Mannerheimintie 12 A, 00100 Helsinki, Finland. When required, Heltti can request the data subject to further define their request in writing, and, if needed, the identity of the data subject can be authenticated before initiating any other measures.