

Vastuu Group Ltd whistleblowing channel privacy notice

Updated on 3 December 2024

1. Controller and contact details

Vastuu Group Ltd (Business ID 2327327-1)
Hevosenkentä 3
FI-02600 Espoo

Contact details of the data protection officer:

email: tietosuoja@vastuugroup.fi

postal address: Vastuu Group Ltd
Data Protection Officer
Hevosenkentä 3
02600 Espoo, Finland

2. Data subjects

The data subjects are current or previous employees of Vastuu Group, its group companies, subcontractors, customers or other stakeholder organisations, or other persons who send a notification through Vastuu Group's whistleblowing channel or who are subjects of information included in a notification sent through the whistleblowing channel.

Safeguarding your privacy is important for us. This privacy notice explains how we process your personal data in connection with notifications sent via Vastuu Group's whistleblowing channel.

3. Purposes and legal basis of personal data processing

Vastuu Group provides a whistleblowing channel service, through which you can report suspected misconduct associated with Vastuu Group's operations. The service is a confidential channel for reporting suspected breaches of legislation included within the scope of the Whistleblower Protection Act or Vastuu Group's Ethical guidelines. You can send notifications openly or anonymously.

In the table below, you can see the purposes of processing your personal data, the personal data categories we process, the basis of processing your personal data and the storage period of your personal data in each situation when we process notifications.

Legal basis	Purposes of processing	Personal data categories	Storage period of data
Controller's statutory obligation	Providing the whistleblowing channel and processing the notifications sent via the channel. Personal data are processed in the service to implement the whistleblowing channel required by the Act on the Protection of Persons Reporting Infringements of European Union and National Law (1171/2022,	<u>Whistleblower:</u> The notification can be made openly or anonymously. The whistleblower may include some personal data of themselves in the notification (such as name, contact details, location, financial information, etc.), or the circumstances associated with the reported event may render the whistleblower indirectly identifiable.	Any personal data considered to be unnecessary with respect to the investigation of the notification will be deleted without unnecessary delay. Data ordered to be stored will be kept for five

	Whistleblower Protection Act).	<p><u>The person to whom the notification concerns</u> The notification may include information concerning the person who is the subject of the notification or information concerning their behaviour or circumstances as well as other personal information (such as name, location, financial information, photographic or video material, etc.). Special categories of personal data may also be represented (such as health data).</p> <p><u>Witnesses and other third parties</u> The notification or investigation material may include names, contact details and other information related to third parties.</p> <p><u>Processors of the notifications</u> Contact details (name, user ID) and log data.</p>	years as required by law, after which they are either deleted or the notification will continue to be stored for the period deemed to be necessary according to a case-specific assessment.
Legitimate interest (receiving notifications on other grievances than breaches of law and correcting such grievances; implementing internal control)	<p>Providing the whistleblowing channel and processing the notifications sent via the channel.</p> <p>Personal data is processed in the service to implement internal control within the Vastuu Group by receiving notifications through the whistleblowing channel on grievances other than breaches of legislation, for example breaches of Vastuu Group's ethical guidelines, in order to be able to take necessary corrective action.</p>	<u>As above.</u>	As above.

4. Sources of personal data

Personal data are collected from the whistleblower when they are using the whistleblowing channel. In addition, during the investigation of the notification, the controller collects necessary information related to the notification from those concerned and other persons and parties related to the events.

5. Automatic decision-making

Automatic decision-making is not applied to the processing of the notifications.

6. Regular disclosure and transfer of personal data

The controller does not disclose personal data received through the whistleblowing channel to third parties for any reason except a disclosure obligation that is based on law and binding on the controller or the investigation of the suspected breach described in the notification.

The controller may use subcontractors for personal data processing. The Finnish Central Chamber of Commerce is in charge of the technical implementation and maintenance of the whistleblowing channel service. The Finnish Central Chamber of Commerce does not process notifications on behalf of the controller.

7. Transfers outside the EU and EEA

Personal data are not transferred outside the European Union or the European Economic Area.

8. Rights of data subjects

You have a number of rights associated with the processing of your personal data. You can read more about them below. However, please note that not all of these rights apply to all circumstances. The available rights depend, among other things, on the legal basis for the processing. The Whistleblower Protection Act partially restricts the rights of the data subject in the processing of personal data related to the whistleblowing channel if it is necessary to safeguard the investigation of the accuracy of the notification and to protect the identity of the whistleblower.

Exercising the rights of the data subject is usually always free of charge. However, if you make excessive requests or your request can otherwise be considered to be unfounded or unreasonable, we may refuse to fulfil your request or charge a reasonable processing fee. In such cases, we will always inform you about the charge in advance.

If you need more information or want to exercise your rights, please see the above contact details and contact the Data Protection Officer.

Below you will find a more detailed description of the rights you have and how you can exercise them.

Right to access and rectify your data

You have the right to inspect what personal data we process about you or to receive confirmation that we do not process your personal data. If you believe that the personal data we process about you is incorrect, inaccurate, or incomplete, you can request us to correct your data. As a data subject, you have the right to access your personal data. The right of the data subject to access the data may be restricted under the Whistleblower Protection Act if it is necessary and proportionate to safeguard the investigation of the accuracy of the notification and to protect the identity of the whistleblower.

Right to erasure

In certain cases, you have the right to have your data erased. We will delete personal data that is unnecessary for the purposes of processing the notification without undue delay.

Right to restrict processing

In certain situations, you have the right to request the temporary restriction of processing. Temporary restriction means that we retain your data but do not process it otherwise than with your consent or for the establishment, exercise, or defense of legal claims. For example, if you need the data we process for the establishment of a legal claim, you can request us to restrict the processing of your data. The right of the data subject to restrict the processing of data does not apply to personal data reported under the Whistleblower Protection Act.

Right to object to processing

In certain situations, you also have the right to object to the processing of your personal data entirely. You can also object to the processing of your personal data based on your specific situation at any time if the processing is based on our legitimate interest.

Right to lodge a complaint with a supervisory authority

If you consider the processing of your personal data to be unlawful, you can submit a complaint with the competent authority which in Finland is the Office of the Data Protection Ombudsman. (<https://tietosuoja.fi/en/home>).

9. Contacts

If you have any questions regarding this privacy notice or you wish to exercise your rights, please contact the controller's data protection officer by using the above email or postal address.