



# **Whistleblowing Channel Privacy Notice**

LEGAL

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**°BLUEFORS**

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# 1 Purpose

Bluefors is committed to operate and perform business in compliance with the principles of honesty and transparency. Employees, Board of Directors, and other third-party stakeholders of Bluefors are encouraged to speak-up and report about serious concerns in their knowledge so that Bluefors can address and correct inappropriate conduct and acts or omissions. All received whistleblowing reports received via Whistleblowing Channel of Bluefors are taken seriously and handled professionally. The Whistleblowing Channel of Bluefors has been implemented pursuant to Directive (EU) 2019/1937, on the protection of persons who report breaches of Union Law ("Whistleblowing Directive") and its national implementing legislation.

This Privacy Notice provides employees, the Board of Directors, customers, suppliers, and other third-party stakeholders of Bluefors and its affiliates with information about the processing of the personal data in relation to the whistleblowing reports and investigation process. This Privacy Notice gives a general description of personal data processing from the initial whistleblowing reporting until the outcome of the investigation. However, individual situation in which personal data is being processed may vary. Thus, all information provided in this Privacy Notice may not be applicable in each different situations, and further information may be provided directly to the persons affected in connection with the collection of personal data and during the process. If you wish to have more detailed information concerning how your personal data is being processed, you should contact the Legal Department of Bluefors.

## 2 Data Controller

Bluefors Oy

Address: Arinatie 10, 00370 Helsinki, Finland  
Phone: +358 9 5617 4800

Contact email for data subjects: [legal@bluefors.com](mailto:legal@bluefors.com)

The Whistleblowing Channel is provided by Bluefors Oy as the parent company of the Bluefors Group. Bluefors Oy receives, investigates and processes all information reported in the whistleblowing process regardless of which Bluefors Group company the information relates to.

## 3 Legal basis and Purposes of Personal Data Processing

The purpose of processing personal data is to set up and maintain the Whistleblowing Channel of Bluefors and to receive, investigate and resolve any activities or omissions presumed to be illegal, dishonest, unethical, or otherwise improper reported via the Whistleblowing Channel of Bluefors. The basis of processing personal data is to fulfil our legal obligation, i.e. comply with the obligations and requirements set out in applicable law (including the Whistleblowing Directive and implementing national legislation).

Additionally, Bluefors also has a legitimate interest to investigate alleged misconducts and violations, safeguarding an effectual implementation of the Code of Conduct of Bluefors and related policies and guidelines and conducting business in accordance with its values, ethical guidelines, and legal requirements. In principle, we do not request or process any special category of data, such as health, religious or ethnic information, but if the processing in relation to the report disclosed by you contains any such data, the data is processed on a lawful basis of the consent of the individual affected or for establishing, exercising, or defending a legal claim.

## 4 Content of the Register

Bluefors may collect and process the following personal data about the whistleblower(s), reported person(s) and other persons affected (witnesses and other individuals directly linked to the case):

- Person's basic data, including name, contact information and professional information;
- Data related investigation, including any information provided by the whistleblower and collected during the investigation; description of suspected misconduct or violation; analyses related to the investigation;
- The outcome of the investigation.

The personal data collected and processed will be restricted to the minimum that is necessary to ensure a fair and complete assessment and resolution of the suspected misconduct or violation.

## 5 Sources of Information

Personal data processed in connection with the Whistleblowing Channel is, by default, received from the report made by the person using the Whistleblowing Channel. The Whistleblowing Channel can be used anonymously, but, at your own choice, you can provide information identifying yourself in the report. Moreover, personal data pertaining to you may be processed if another person has identified or otherwise indicated information relating to you in a whistleblowing report made by them.

Where applicable, information from other sources, as applicable, may be used to verify the accuracy of whistleblowing reports and where such a report leads to an investigation, additional personal data may be collected and processed in connection with the investigation. Such personal data may be collected from publicly available sources or based on information received from the authorities or other third-parties within the limits of the applicable laws and regulations.

## 6 Data Retention

The personal data collected is retained for the period necessary to fulfil the purposes outlined in this Privacy Notice unless a longer retention period is required by law or by Bluefors to protect the legal rights of Bluefors. After the termination of an investigation, Bluefors passively retains personal data for pre-defined time periods based on the legislative requirements and genuine needs of Bluefors in accordance with the internal guidelines and policies of Bluefors. In any case, your personal data will be stored in the Whistleblowing Channel of Bluefors for no longer than 20 years from the completion of the whistleblowing investigation. The secretary of the Ethics Committee of Bluefors is responsible for monitoring the data retention periods.

Bluefors regularly assesses the need for retaining personal data, taking into account applicable legislation. Additionally, Bluefors undertakes such reasonable actions that ensure no incompatible, outdated, or inaccurate personal data is stored taking into account the purpose of the processing. Bluefors corrects or erases such data without delay.

## 7 Data Disclosures

The whistleblowing reports of alleged misconducts and violations are collected and managed by the Ethics Committee of Bluefors for the purposes of investigations and any follow-on action. The data will not be disclosed to any other parties, unless required for the investigation or follow-on actions with a legitimate need to know and in accordance with the Ethics Committee and Whistleblowing Charter of Bluefors.

Bluefors may use qualified external third-party experts under confidentiality obligations to support and conduct the investigations. Personal data may also need to be disclosed to the competent authorities due to legal requirements or in relation to legal proceedings. Data accessed by these third parties is

limited to the purposes outlined above. Additionally, the on-line Whistleblowing Channel is provided and maintained by an external service provider under strict non-disclosure obligations.

## 8 Data processed within the EU/EEA

Bluefors processes the personal data disclosed in connection with the whistleblowing process only within the European Union or European Economic Area.

## 9 Confidentiality and Data Security

All reported matters are processed as confidential and only the members of the Ethics Committee can access the report. If necessary for the investigation, other specifically named persons (internal or external), who have a valid need to know, can be consulted and information shared with them. All members of the Ethics Committee as well as other persons (internal or external) who, case specifically, have access to information in the whistleblowing report are bound by a confidentiality obligation.

It is possible to file a whistleblowing report anonymously, however, Bluefors encourages to file the whistleblowing report by providing the name and contact details. When a whistleblowing report is filed with contact details, it facilitates further handling of the matter and possible subsequent investigations. In case the report is filed anonymously Bluefors, or the service provider, cannot identify the whistleblower or in any way track the whistleblowing report. It is, however, possible for the Ethics Committee to anonymously communicate with the reporter via the Whistleblowing Channel.

Personal data in the Whistleblowing Channel and information recorded during the investigation process are protected against unauthorized access with information security measures. Entering the Whistleblowing Channel and access to personal data are granted only to persons who need the access in order to fulfil the tasks and duties relating to their role within Bluefors. Additionally, Bluefors and its service providers are actively monitoring the confidentiality, integrity and availability of the IT environment and have implemented technical measures to prevent and detect incidents that may threaten any personal data.

The security of personal data is also ensured when transferring or disclosing the data internally or to other parties. The measures employed vary based on the sensitivity of the data and includes e.g. identification of authorized recipients and encryption.

## 10 Your Rights

You have the right to obtain confirmation as to whether or not personal data concerning you are being processed, and inspect the personal data processed concerning yourself. You have the right to request the rectification of the personal data pertaining to you that is processed insofar as such personal data would be inaccurate, outdated, unnecessary or unlawful. Where you would contest the accuracy or other aspects of the personal data, you also have the right to request the restriction of processing of your personal data until a decision on whether to rectify your personal data is made (i.e. until it is verified whether the data is inaccurate, outdated, unnecessary or unlawful with respect to whistleblowing process in question). You also have the right to request the deletion of your personal data. On grounds relating to your particular situation, you are entitled to object to the processing of personal data concerning you, provided that the processing is based on our legitimate interest. If the processing of your personal data is based on consent, you have the right to withdraw your consent any time. You are entitled to lodge a complaint with a competent data protection authority regarding our processing of personal data.

Please contact Bluefors by using the contact details in Section 2 above if you wish to exercise your rights.