



Speak Up Channel Privacy Notice

March 27, 2025

°BLUEFORS

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1 Background

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 reports received via Speak Up Channel of Bluefors are taken seriously and handled professionally. The Speak Up 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 as well as in compliance with the EU's General Data Protection Regulation (EU) 2016/679 ("**GDPR**").

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 reports and investigation process. This Privacy Notice gives a general description of personal data processing from the initial 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: privacy@bluefors.com

The Speak Up 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 investigation process regardless of which Bluefors Group company the information relates to.

3 Legal basis and Purpose of Personal Data Processing

The purpose of processing personal data in compliance with the Whistleblowing Directive and GDPR is to set up and maintain the Speak Up 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 Speak Up Channel of Bluefors.

The legal 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 process personal data 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 reporter(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 to the investigation, including any information provided by the reporter 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 Speak Up Channel is, by default, received from the report submitted by the person using the Speak Up Channel. The Speak Up 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 report made by them.

Where applicable, information from other sources, as applicable, may be used to verify the accuracy of 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 data received through Speak Up Channel will be deleted five (5) years after the receipt of the report, unless their retention is necessary for the implementation of the rights or obligations provided for in the Act on Whistleblower Protection or other legislation, or for the establishment, exercise, or defense of legal claims. Personal data that is not clearly relevant for the processing of the report must be deleted without undue delay. For reports outside the scope of the Act on Whistleblower Protection, Bluefors adheres to the corresponding retention periods, unless otherwise provided by applicable law. The information in the register is reviewed annually to assess its necessity.

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 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 Speak Up Policy or Speak Up Investigation Instructions 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 Speak Up Channel is provided and

maintained by an external service provider under strict non-disclosure and GDPR data protection obligations.

8 Data processed within the EU/EEA

Bluefors processes the personal data disclosed in connection with the investigation 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 report, are bound by a confidentiality obligation.

It is possible to submit a report anonymously, however, Bluefors encourages to submit the report by providing the name and contact details. When a 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 reporter or in any way track the report. It is, however, possible for the Ethics Committee to anonymously communicate with the reporter via the Speak Up Channel.

The Bluefors Speak Up Channel is based on a secure and encrypted service that is managed by an external service provider, WhistleB, which ensures the appropriate data protection and information security, including ensuring the anonymity of the reporter. Personal data in the Speak Up Channel and information recorded during the investigation process are protected against unauthorized access with information security measures. Entering the Speak Up 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

In accordance with Articles 15-22 of the GDPR, you have the following rights regarding your personal data:

- **Right to access:** Obtain a copy of your personal data and information about how it is processed. However, this right does not apply to e.g. emails of Bluefors employees, if the individual has not been a party of the conversation, as such messaging is protected by the constitutional right of secrecy of correspondence, telephony, and other confidential communications. (<https://www.kyberturvallisuuskeskus.fi/en/our-activities/regulation-and-supervision/confidential-communications>)
- **Right to rectification:** Correct inaccurate or incomplete personal data.
- **Right to erasure ("right to be forgotten"):** Request the deletion of their personal data in certain circumstances.
- **Right to restriction of processing:** Request the restriction of processing in certain circumstances.
- **Right to data portability:** Receive your personal data in a structured, commonly used format and right to transfer the data to another controller, where technically feasible.
- **Right to object:** Object to the processing of your personal data in certain circumstances.

- **Right to withdraw consent:** Withdraw consent at any time, where processing is based on your consent.
- **Right to non-automated processing:** Object not to be subject to a decision based solely on automated processing.

The above stated rights are subject to a **one-month** response time by the controller (Bluefors), within which a reply shall be given to the individual exercising its rights under the GDPR, starting from the day the request has been received. However, the response shall always be given as soon as possible, and the response time may be extended by an additional two months (i.e. up to a total of three months) under special circumstances, if the inquiry is exceptionally complicated or there is a large number of inquiries, but in such cases the need for additional time must be communicated to the individual within the original one month time period. You are entitled to lodge a complaint with the 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.