



## **PRIVACY POLICY FOR WHISTLEBLOWING CHANNEL AT ANORA GROUP PLC**

### **1. INTRODUCTION**

Anora Group Plc and its affiliates ("**Anora**") are committed to protecting your personal data in accordance with applicable data protection and privacy laws. The purpose of this Privacy Policy is to describe the ways Anora collects, stores, uses, manages and otherwise processes your personal data in relation to Anora's Whistleblowing Channel.

### **2. CONTROLLER AND CONTACT INFORMATION**

Anora Group Plc, Kaapeliaukio 1, 00180 Helsinki, Finland, is the controller of your personal data. In all matters pertaining to this Privacy Policy, you may contact the controller at [dataprivacy@anora.com](mailto:dataprivacy@anora.com).

### **3. SCOPE OF THE PRIVACY POLICY**

Anora offers a Whistleblowing Channel that enables employees and any other stakeholders (including Anora's employees, customers, other contacts and external stakeholders) to alert the company on a suspicion of misconduct within Anora. You can submit the alert anonymously without entering any personal data, but you may do so voluntarily if you so wish. This Privacy Policy describes the processing of personal data in connection with the Whistleblowing Channel.

### **4. PURPOSES OF PROCESSING**

If you decide to submit personal data in connection with your report, such personal data will be processed for the following purposes:

- To provide and maintain the Whistleblowing Channel and assess and follow up on submissions to the Whistleblowing Channel
- To investigate submissions and alleged violations
- To take any necessary follow-up action upon the completion of an investigation
- To create anonymous and aggregate reports regarding the Whistleblowing Channel and the submission received therefrom.

### **5. GROUNDS OF PROCESSING**

In case you choose to submit your personal data, your personal data in the whistleblowing service may be stored, used and otherwise processed by Anora for the purpose of investigating your report and the incident you have submitted to the Whistleblowing Channel. Your personal data is collected directly from you. The personal data may include your name, contact information, position and any other information you may choose to submit in the course of investigating your report and the incident you have submitted to the Whistleblowing Channel.

Anora may process your personal data on the following grounds:

- a) performance of employment contract (GDPR Art. 6.1(b));
- b) compliance with legal obligations to which Anora is subject (GDPR Art. 6.1(c));
- c) legitimate interests pursued by Anora (GDPR Art. 6.1(f)); and
- d) carrying out the obligations and exercising specific rights of Anora in the field of employment and social security and social protection laws (GDPR Art. 9.2(b)).



The ground(s) of processing depend on the nature of the submitted report and data.

Anora retains your personal data for as long as the data is required for the aforementioned purpose, or as required by applicable laws. When such requirements no longer exist, the personal data will be deleted.

## 6. RECIPIENTS AND DISCLOSURES OF PERSONAL DATA

Your personal data may be disclosed to and processed by:

**Group companies:** Anora Group Plc's affiliates located in Finland, Sweden, Norway, Denmark, Estonia, Latvia when and to the extent disclosure is necessary for the aforementioned purposes

**Subcontractors:** Anora's subcontractors processing personal data on Anora's behalf for the aforementioned purposes. The Whistleblowing Channel is provided by Navex Global Inc. Other subcontractors may include e.g. companies providing Anora with technical services and support with regard to the Whistleblowing Channel.

**Authorities:** Anora may be required to disclose your personal data to authorities under Applicable Laws or in connection with legal proceedings.

Personal data is not transferred to countries outside the European Economic Area.

## 7. SECURITY

Anora endeavors to use appropriate technical and organizational measures (having regard also to the nature of the personal data involved) to protect your personal data. Such measures include, where appropriate, use of firewalls, secure server facilities, encryption, implementing of proper access rights management systems and processes, careful selection of processors and other technically and commercially reasonable measures to provide appropriate protection for your personal data against unauthorized use or disclosure. Anora may also take appropriate back-up copies and use other such means to prevent the accidental damage or destruction of your personal data and to ensure that Anora's Whistleblowing Channel is functioning properly.

## 8. YOUR RIGHTS

With respect to the processing of your personal data, you have the following rights, as appropriate and subject to possible restrictions arising from applicable laws:

- **Right to access:** You are entitled to be informed of what personal data Anora holds about you.
- **Right to request correction, blocking or deletion:** You are entitled to request Anora to rectify, delete or block (as appropriate) your personal data that is incorrect, incomplete or otherwise inaccurate.
- **Right to object:** You have the right to object to Anora's processing of your personal data on compelling, legitimate grounds relating to your circumstances.

If you wish to use any of these rights, kindly send an e-mail to [dataprivacy@anora.com](mailto:dataprivacy@anora.com).

**In addition to the above mentioned rights, you have the right to lodge a complaint:** You are entitled to lodge a complaint on Anora's personal data processing with competent data protection authority in the EU Member State of your residence, place of work or of an alleged infringement of applicable laws.

## 9. UPDATES

Anora may update this Privacy Policy to reflect changes in its data processing practices.