

## PRIVACY POLICY FOR WHISTLEBLOWING SERVICE AT ALTIA

### 1. INTRODUCTION

Altia Oyj and its affiliates ("Altia") 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 Altia collects, stores, uses, manages and otherwise processes your personal data in relation to Altia's whistleblowing service.

### 2. CONTROLLER OF PERSONAL DATA AND CONTACT INFORMATION

Altia Oyj, Kaapeliakio 1, 00180 Helsinki, Finland, is the controller of your personal data. In all matters pertaining to this Privacy Policy, you may contact Thomas Heinonen, General Counsel, at +358 400 186005 or [thomas.heinonen@altiacorporation.com](mailto:thomas.heinonen@altiacorporation.com).

### 3. NAME OF THE DATA FILE

Whistleblowing data register

### 4. PROCESSING OF PERSONAL DATA

Altia offers a whistleblowing service that enables you and any other stakeholder (including Altia's employees, customers, other contacts and external stakeholders) to alert the company on a suspicion of misconduct within Altia. You can submit the alert anonymously without entering any personal data, but you may do so voluntarily if you so wish.

In case you choose to submit your personal data, your personal data in the whistleblowing service may be stored, used and otherwise processed by Altia for the purpose of investigating your alert. Your personal data is collected from you and any publicly accessible sources. The personal data may include your name, contact information, position and any other information you may choose to submit or otherwise collected in the course of investigating the alert.

The processing of personal data is based on your consent, and you may at any time revoke your consent. Unless you revoke your consent, Altia retains your personal data 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 within thirty (30) days.

### 5. REGULAR TRANSFERS OF DATA

In accordance with this Privacy Policy and applicable laws, your personal data may be transferred to, and processed by:

- Altia's subcontractors for the purpose of developing and supporting the tool used for the whistleblowing service;
- a prospective seller or buyer in the event Altia intends to sell or buy any business or assets, and
- in cases of alleged criminal offences, your personal data may need to be disclosed during judicial proceedings. You will be notified of any such disclosure.

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

## 6. SECURITY

Altia 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. Altia 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 Altia's services are functioning properly.

## 7. 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 Altia holds about you.
- **Right to request correction, blocking or deletion:** You are entitled to request Altia 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 Altia's processing of your personal data on compelling, legitimate grounds relating to your circumstances.

## 8. UPDATES

Altia may update this Privacy Policy to reflect changes to its data privacy practices.