

Information on the processing of personal data

Here you will find information about how Kivra collects and uses your personal data when you report a case or if there is information about you in a report in our external whistleblower channel Visslan, which is provided by The Whistle Compliance Solutions AB ("Visslan"). You will also receive information about your rights, how you can go about exercising any of these rights and where you can go if you have any questions.

When we refer to "Kivra", "we" or "us", it refers to Kivra AB (reg. no. 556840-2266), Klara Norra kyrkogata 33, 111 22 Stockholm, Sweden.

E-mail: dataskydd@kivra.se

About the processing of personal data

Which personal data is processed and about whom?

When a report is submitted via the whistleblower channel, we process personal data about:

- The person submitting the report (the whistleblower)
- The person or persons identified in the report
- Other people mentioned in the report, such as witnesses

Personal data that may be processed, depending on the information provided in connection with whistleblowing, are:

- name
- city
- sex
- nationality
- roles or functions
- contact information (for example, address, email, phone number),

- details of the reported incidents
- measures taken
- investigative reports and
- other types of personal data collected during the investigation, such as phone logs, data files, audio files, IP address and other technical data and correspondence

If it is relevant to the case, we may also process sensitive personal data, such as information about:

- Ethnic origin
- Political views
- Religion or outlook on life
- Union affiliation
- Health or sex life

We may also process information about crimes, both suspected and established, if this is reported in Visslan. Whoever submits a report should avoid including sensitive information, unless it is necessary for the case.

What is Kivra's legal basis for processing your personal data?

We process personal data to receive, investigate and follow up on reports submitted via Visslan. The personal data may also be processed to take necessary measures based on the content of the report as evidence in legal proceedings when required by law or other constitution. The legal basis for the processing is our obligation under the Act (2021:890) on the protection of persons who report wrongdoing ("the Whistleblower Act"). If the processing includes sensitive personal data, it takes place with the support of; an important public interest (for example to deal with serious misconduct) or the need to establish, assert or defend legal claims.

How long does Kivra store your personal data?

Your personal data is only saved as long as it is needed to investigate the report and is saved for a maximum of two years. If measures are required, such as an investigation by an authority, the personal data is saved as long as it is necessary for this purpose.

Does Kivra share your personal data with third parties?

When reporting via Visslan, external representatives will determine whether a reported misconduct should be treated as a whistle-blowing case or if there are other, more appropriate ways to handle the received case.

The information is treated confidentially and shared only when necessary to investigate and manage the matter, or to meet legal requirements and protect our rights.

Your personal data may be shared with third parties in the following cases:

- Legal advisors, accountants, IT security experts and other suppliers who assist in the investigation
- Chairman of the board for Kivra AB
- Depending on what has happened, the system provider for the whistleblower channel, The Whistle Compliance Solutions AB
- The police, regulatory authorities or courts, if required in relation to measures taken

What rights do you have?

When we process your personal data, you have several rights according to the data protection regulation. Below you will find out who they are and how you can exercise one or more of these rights. More information about your rights can be found in the Privacy Protection Authority's (IMY) [homepage](#).

Note that certain restrictions on your rights apply specifically to the processing that occurs within the framework of the whistleblower channel. Among other things, you do not have the right to have your personal data deleted or to object to processing if it is processed within the framework of an ongoing investigation.

Right to information

If a notification contains your personal data or if your personal data is collected during an investigation, we will, if possible, inform you of this. If it could endanger the investigation to provide such information to you, you will instead be informed as soon as possible after the investigation has reached a stage where such risk no longer exists.

Right to rectification

You have the right to request correction of your personal data. It is important that the information we process about you is correct. If you change your phone number, email address and other contact details or discover that the information we have about you is incorrect or incomplete, you have the right to request that we correct it.

Right to have your personal data deleted

Under certain circumstances, you have the right to have the personal data Kivra processes about you deleted. This is, for example, the case if it is no longer necessary for Kivra to process the data for the purpose for which we initially collected your personal data. The right to have personal data deleted is not absolute, but applies when the legal conditions for deletion are met. Examples of situations when those conditions are not met, and we will not delete your data, are if the data is necessary to process for the legal purpose for which it was collected, or if we have to retain the data according to law.

Right to access

You have the right to receive confirmation of whether Kivra is processing personal data about you, and in such cases to also have access to the personal data we process, together with certain information about the processing itself. You get access to your personal data by giving you a copy of the personal data we process, in a so-called register extract. It is free of charge to obtain a copy of your register statement. As a rule, we send you your register extract in Kivra. The register extract can also be sent encrypted via email, or to your civil registry address, if you prefer or if you do not have a Kivra account.

Right to object to processing

You have the right to object at any time to processing that Kivra carries out with your personal data against the background of a so-called balancing of interests. If you object to such processing, Kivra may no longer carry out the processing, unless we can demonstrate compelling legitimate reasons for the processing that outweigh your interests, rights and freedoms; or if it is for the establishment, exercise or defense of legal claims.

Right to limitation of treatment

You have the right to request that we limit our processing of your personal data. Your right to restrict the processing of your personal data applies if you believe that information about you is incorrect; that the processing is against the law (but you object to the deletion of the data); that we no longer need the data for the purpose for which it was processed (but you need it to establish, exercise or defend legal claims); or if you have exercised your right to object to our processing of your personal data.

Right to move your personal data to another recipient (data portability)

You have the right to obtain certain personal data about you in a structured, commonly used and machine-readable format, so-called data portability. You have the right to transfer such data to another recipient, for example another service. If it is technically possible, as determined by Kivra, you also have the right to request that Kivra transfer the data directly to the other recipient. The right to data portability only covers personal data concerning you, which you yourself have provided to Kivra, which Kivra processes automatically, and which you have agreed to provide to Kivra or which you have provided to Kivra due to an agreement.

Right to withdraw your consent

In cases where we process your personal data based on your consent, you have the right to withdraw your consent at any time. When you withdraw your consent, we will stop the processing. Withdrawing your consent does not affect the legality of the processing that was based on your consent, before the consent was withdrawn.

Automated decisions

You have the right not to be subject to a decision based solely on automated processing, including profiling, which has legal consequences for you or similarly significantly affects you. Automated decision making is permitted if it is; necessary to enter into or fulfill a contract between you and the Company (eg your employment contract); is based on your express consent or is permitted under specific applicable law. Kivra does not currently make any decisions based on automated processing in the manner described above. Should Kivra introduce such automated decision-making in the future, you will be informed of this.

How can you exercise your rights?

If you want to get in touch with Kivra to exercise any of your rights under the data protection regulation, you can reach Kivra's legal team at the email address: dataskydd@kivra.com. If you want to get in touch with Kivra's Data Protection Officer (DPO), write "DPO" in the subject line and send to the email address above.

If you wish to exercise any of your rights, we will inform you of the measures we have taken in response to your request within one month at the latest. This period can be extended by another two months, if necessary depending on the complexity of your request or the number of other requests received. We will inform you of any such extension and the reasons for the extension within one month of receiving your request.