

# Privacy statement for the whistleblower channel

## 1 Privacy protection

Your privacy is important to us. Pihlajalinna is committed to protecting your privacy and to complying with the Finnish legislation on the processing of personal data and data protection. Pihlajalinna processes the personal data it gathers about you as specified in this privacy statement.

If you have any questions about the processing of your personal data, please contact Pihlajalinna, using the contact information below.

## 2 General information on controlling the data file

Name of the personal data file:  
Whistleblower channel

The controller:  
Pihlajalinna Plc, Business ID 2617455-1, P.O. box 110, 33101 Tampere

The person responsible for data protection:  
Marika Vihervaara, tel. +358 10 312 010, tietosuoja@pihlajalinna.fi

Contact person for data file matters:  
Jaakko Liljeroos, tel. +358 10 312 010, jaakko.liljeroos@pihlajalinna.fi

## 3 Purpose for processing the personal data

The personal data may only be processed for the purpose of meeting Pihlajalinna Plc's legal and ethical obligations and investigating the reported notifications appropriately.

Pihlajalinna processes the personal data based on the data subject's content and statutory obligation (the Whistleblowing Directive (EU) 2019/1937) and its justified interest to investigate any misconduct or other reported incidents in its operations.

## 4 Content of the data file and sources of data

The data stored in the data file are reported to Pihlajalinna by the whistleblower.

The data file collects the personal data that is necessary for investigating the report:

- information about the report
- information about the report may include data of the person who is subject to the report, such as name and location
- the whistleblower's personal data, such as name, email address and phone number, if the whistleblower includes this information in its report

Where sensitive personal data is processed, for example, when the processing is unavoidable in order to make, present or defend a legal claim, the processing complies with the EU legislation.

## **5 Protecting the data file content and the principles of processing**

Pihlajalinna protects the processing of the whistleblower data file content through appropriate technical and organisational measures, such as limited access rights and passwords. The persons who process the whistleblower data file content are bound by an obligation of secrecy.

## **6 Data disclosures and transfers**

Pihlajalinna does not transfer the data to outside the EU/EEC.

Personal data may be disclosed to third parties, such as authorities or external inspectors, where required, for example, by law.

## **7 Rights of the data subject**

The data subject has the right to inspect their own data stored in the data file and request the rectification of any errors in the data. The data subject also has the right to remove their data from the data file and request their transfer to another company. In addition, the data subject has, in certain cases, the right to request limiting the processing of their data and reject the processing of their data.

If a data subject has any questions about the processing of their personal data or this privacy statement, they may contact the controller's contact persons listed at the beginning of this statement. If a data subject wishes to use their rights, the request must be made in writing, using the forms specifically intended for this purpose by Pihlajalinna. Forms related to using the data subject's rights are available on the Pihlajalinna website at [www.pihlajalinna.fi](http://www.pihlajalinna.fi) and from Pihlajalinna's offices.

## **8 Personal data retention period**

As a rule, the data is stored for a maximum of two years after the end of the investigation.

## **9 Other terms and conditions**

Pihlajalinna always seeks to solve any disputes directly with the data subjects. However, the data subject has the right to forward a dispute concerning the processing of their personal data to the data protection authorities for investigation.