

## Privacy statement for Whistle-blower Channel

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7 September 2021

### 1. Data controller details

Lappset Group Ltd (“Lappset Group”), business ID 9126694-6  
Street address: Hallitie 17, Rovaniemi, FINLAND  
Postal address: P.O. Box 8146, FI-96101 Rovaniemi, FINLAND  
[lappset@lappset.com](mailto:lappset@lappset.com)  
tel. +358 20 775 0100

### 2. Contact person for matters related to register

Ann-Mari Tuominen, VP, People & Culture  
Lappset Group Oy  
[ann-mari.tuominen@lappset.com](mailto:ann-mari.tuominen@lappset.com)  
Phone: +358 40 512 0372

### 3. Register name

Whistle-blower channel

### 4. Purpose of personal data use and grounds for processing personal data

The processing of data concerns the maintenance of Lappset Group’s whistle-blower online channel. The whistle-blower online channel provides Lappset Group’s customers, employees and other stakeholders with the opportunity to report concerns related to Lappset Group’s or its customers’ projects, or suspected improper conduct by Lappset Group. The provider of feedback may supplement their personal data given on the feedback form to enable Lappset Group to contact them, if necessary, after the submission of the form. However, the feedback form can also be sent anonymously.

Lappset Group collects and processes personal data about you for the purpose of pursuing a legitimate interest of Lappset Group (in accordance with article 6(1) (f) GDPR), in ensuring compliance with applicable laws throughout all of Lappset Group’s operations and facilitating the provision of information by data subjects from Lappset Group regarding a suspected breach of such compliance and in order to provide a response to the requests made by you which interests in processing the personal data overrides your interests.

Lappset Group also collects and processes personal data about you for the purpose of complying with legal requirement in order to meet a legal obligation imposed by law (in accordance with article 6(1) (c) GDPR), by regulation or by community and/or national rules specific for the reported concern if applicable.

## 5. Data contained in the register

Lappset Group collects and processes the following personal data about you for the above mentioned purposes:

- Name
- Email address
- Content of the report
- Telephone number

**The feedback form can also be sent anonymously, in such a case, the above data will not be stored in the register.**

## 6. Storage period of personal data

The whistle-blower feedback will be deleted after it has been processed. All data (including personal data) in the register will be reviewed annually to evaluate its necessity. However, all personal data will be deleted from the register no later than twelve months (12) after the submission of the feedback form.

## 7. Regular sources of information

This information is collected from whistle-blower feedback forms filled out by you on the Lappset Group's website.

## 8. Regular disclosure of data and groups of recipients

No data will be disclosed.

## 9. Transfers of information outside the EU and the EEA

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

## 10. Protection principles of the register

### Manual materials

Possible manual materials are stored in a locked space that can only be accessed by authorized persons. Electronically processed data

Employees are strictly obliged to maintain secrecy. Employees have also agreed to follow Lappset Group's internal data security policy.

Data stored in information systems and backup copies are located in locked facilities, which are constantly monitored. Hardware on which the register is located is highly secured and separated from the public network by a firewall and other technical measures.

User rights to the register have been restricted with role-based rights.

The purpose of the measures presented above is to secure the confidentiality of personal data stored in the register, the availability and integrity of the data, and the implementation of your rights.

#### **11. Your rights as a data subject related to personal data processing Data subject's right to access data (right of inspection)**

As a data subject you are entitled to inspect what personal data has been stored in a register. An inspection request must be submitted as instructed in this privacy statement to contact person mentioned in section 2. The right to inspection may be declined only on legal grounds. For once per calendar year, using the right of inspection is free of charge.

#### **Data subject's right to request data to be corrected, removed or its processing to be limited**

The data subject must without undue delay after being notified of an error, or after having detected an error, correct, remove or supplement the incorrect, unnecessary, insufficient or outdated information included in the register, or information that is contrary to the purpose of the register.

If a data subject is unable to correct the information themselves, a request for correction must be submitted to contact person mentioned in Section 2 of this privacy statement.

A data subject may also request that the data controller limit the processing of their personal data for example if the data subject is awaiting a response from Lappset Group to a request to correct or delete the information.

#### **Data subject's right to file a complaint with the supervisory authority**

As a data subject you are entitled to file a complaint with a competent supervisory authority in your local country if Lappset Group has not followed the applicable data protection regulation in its operations.

#### **12. Contacts**

You should contact Lappset Group with any questions related to personal data processing and enforcing your rights. You may exercise your rights by contacting the person mentioned in section 2.