Privacy statement for the whistleblowing reporting channel

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1 Data controller and contact information for data matters

Brandt Group Oy, Ltd

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Contact for data matters

GDPR@kolmeks.com

2 What are the purposes and legal basis for processing your personal data?

The purpose of processing personal data is to implement the whistleblowing reporting channel and handle the reports received through it. The data is used to monitor and investigate misconduct and, if necessary, to prepare, present, or defend a legal claims.

The reporting channel enables the company to monitor compliance with rules and laws related to its decision-making and oversight systems, particularly concerning accounting, audits, bribery, money laundering, environmental and financial crimes, and competition law. The maintenance of the reporting channel is based on the Whistleblower Protection Act (1171/2022). The legal basis for processing is the data controller's compliance with its statutory obligations (Article 6(1)(c) of the GDPR, Section 6(1) of the Finnish Data Protection Act.

Through the reporting channel, an individual can also report actions that are in violation of the Kolmeks Group Code of Conduct. The legal basis for processing such reports is our legitimate interest in ensuring the lawfulness and ethics of our operations (Article 6(1)(f) of the GDPR). In cases where such reports include sensitive categories of personal data, the processing of such data is necessary to formulate, present, or defend legal claims, in accordance with Article 9(2)(f) of the GDPR.

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3 What types of personal data do we process and where do we collect the information?

Reports can be made anonymously.

The reports may include information about possible actions in violation of laws or ethical guidelines, such as dates of occurrences, descriptions of behavior, or other details related to the actions being reported. Reports may include names, titles, and job-related information about individuals. It is possible that individuals may be identified based on the circumstances described in the report, even if their names are not mentioned.

The reports may contain or, during the investigation, reveal sensitive categories of personal data. However, this is unlikely and depends on the subject of the report. Whistleblowers are encouraged to avoid including unnecessary personal data in their reports.

Information is collected from the reports made through the reporting channel and, during the investigation of these reports, from other internal sources such as employees and IT systems.

4 To whom do we disclose or transfer data?

The processing of reports received through the reporting channel is handled by the company's Whistleblowing team. Additionally, a limited number of other individuals may be involved in the processing, such as legal advisors, authorized experts, and individuals participating in the audit.

The identity of the whistleblower will not be disclosed without their express consent, except to those individuals responsible for receiving and following up on the reports. However, the whistleblower's identity may be disclosed if necessary to a competent authority to verify the accuracy of the report, to law enforcement authorities or prosecutors for the execution of their legal tasks, or to formulate, present, or defend legal claims. The whistleblower will be informed in advance if their identity is to be disclosed, unless such disclosure would jeopardize the verification of the report's accuracy or interfere with an ongoing investigation or legal proceedings.

The technical implementation of the reporting channel is provided by First Whistle (Juuriharja Consulting Group Oy). The service provider does not have access to the reports submitted to the channel.

5 Do we transfer data outside the EU or EEA?

Personal data is not transferred outside the EU or EEA.

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6 How do we protect data and how long do we retain it?

Only individuals who are authorized to process data as part of their duties have access to the system. These individuals are bound by confidentiality obligations. Each user has a unique user ID and password for accessing the system.

Personal data will be stored as long as necessary to fulfill the purpose of processing or to comply with legal obligations. Data will be deleted five years after the report is received, unless retaining the data for a longer period is necessary for fulfilling legal rights or obligations, or for formulating, presenting, or defending legal claims.

7 Your rights as a data subject in relation to data processing

In accordance with the General Data Protection Regulation (GDPR) and the Finnish Data Protection Act, you, as a data subject, have the following rights. However, these rights are not absolute – the implementation and/or limitation of these rights are regulated by law and possible regulatory requirements or guidelines, which are not exhaustively described below.
For example, the company may have the right to limit the exercise of the rights listed below if it is necessary and proportionate to ensure the security of the investigation and follow-up actions or to protect the identity of the whistleblower. Requests regarding data subjects' rights should be submitted to the contact address mentioned in Section 1.

- Right to access and right to rectify or erase data
    - You have the right to access the personal data we hold about you and the right to request the correction of incorrect data or the erasure of data if there are legally justified grounds for doing so.
- Right to object and right to restrict processing
    - When the processing is based on legitimate interest, you have the right to object to the processing of your data based on your particular situation and the right to request the restriction of the processing of your data. In connection with the request, you must specify the particular situation on which you base your objection to the processing. The data controller may refuse to comply with the request only on legal grounds.
    - When the processing is based on our legal obligation, the right to object to or restrict the processing does not apply.
- Right to lodge a complaint with a supervisory authority
    - You have the right to lodge a complaint with a supervisory authority, particularly in the EU member state where you have your habitual residence or place of work, or where the alleged infringement occurred, if you believe that the processing of your personal data violates the GDPR.
- Data processed in the whistleblowing reporting channel is never subject to automated decision-making.

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