



PRIVACY POLICY, Whistleblowing procedure

1. General

Quattro Mikenti Group Oy (hereinafter referred to as “QMG”) and its subsidiaries are committed to protecting privacy and processing personal data in accordance with applicable data protection legislation and good data protection practices.

This Privacy Policy describes how QMG collects, processes and protects the personal data of persons who submit a whistleblowing report and persons who are the subject of such a report. QMG shall not process the whistleblower’s personal data if the report is made anonymously.

QMG and companies belonging to the same group of companies act as joint controllers. This Privacy Policy describes how personal data is collected and processed for common purposes.

Personal data means any information relating to an identified or identifiable person. Special categories of personal data means any information revealing ethnic origin, political opinions, religion or belief, or trade union membership. Sensitive data also includes genetic and biometric data, the purpose of which is the individual identification of a person, as well as data concerning health and sexual behaviour and orientation.

Processing means any action, both manual and automatic, performed on personal data, such as collection, storage, organisation and erasure.

A data controller means an entity that, alone or together with others, determines the purpose and use of the collected data, that is, decides how personal data is processed.

2. Joint controllers and contact information

This Privacy Policy applies to the whistleblowing reporting procedures of Quattro Mikenti Group Oy and its group companies (collectively “QMG”).

Quattro Mikenti Group Oy is responsible for the administration of the personal data register described herein and also acts as a single point of contact with regard to data protection issues.

Quattro Mikenti Group Oy
Piispantilankuja 2 A
02240 Espoo, Finland
Business ID: 2824749-4
tietosuoja@qmg.fi

All joint controllers of the register can be found on the Group’s website at <https://qmg.fi/en/contact/>

3. From which sources is personal data obtained?

QMG collects personal data provided by the whistleblower through the whistleblowing system or other channels. In addition, during investigations, personal data is collected from QMG’s internal systems and third parties, if necessary.

4. What personal data is collected?

QMG collects personal data that is necessary for the investigation. This may include:

- **basic information**, such as name, email address and position at QMG

- **information provided in the report**, including all information provided by the whistleblower, such as the identity of the alleged perpetrator, the description and basis of the alleged misconduct, and all other relevant information
- **investigative information**, which includes all information necessary for the investigation of the alleged misconduct, such as employment information, audit and financial information, information available in third-party reports and assessments, as well as online conduct and log-in information.

QMG will delete any personal data that is deemed irrelevant or unnecessary to the matter in question. In general, special categories of personal data are not processed in the whistleblowing process. However, if any such personal data is processed, for example, where the processing is necessary for the establishment, exercise or defence of a legal claim, the processing is carried out in accordance with local and EU law.

5. What is the data used for?

Personal data will be used in the investigation of the reported case and, if the allegation is confirmed, in the implementation of disciplinary and corrective measures. The processing is based on the following criteria:

the processing is necessary for QMG to comply with its legal obligations
the processing is necessary to protect QMG's legitimate interests.

A description of QMG's legitimate interest: The whistleblowing channel is a way to monitor the implementation of QMG's ethical principles. Through the whistleblowing channel, it is possible to obtain important and systematic information on possible suspected misconduct and violations, and to react to them in a timely manner. The existence of a whistleblowing channel supports a good corporate culture by enabling employees to bring up problems and concerns. QMG cannot separately request consent from the subjects of a report. Reports may also be submitted anonymously. Misuse of the whistleblowing system (e.g. a malicious false report) will result in sanctions such as disciplinary action.

6. How long is the data stored?

Once the investigation of a report has been completed, the case is closed. Material collected during investigations is stored safely until the expiration of the claim period, after which the material is discarded. In most cases, the material will be disposed of within two months of the completion of the investigation. The retention period may vary in accordance with mandatory legal requirements. These include, for example, laws on occupational safety, corruption, ethics and accounting. However, the data will be stored for a maximum of two years after the end of the investigation. If the case is taken to court and the court proceedings require a longer retention period, the data will be stored for the duration of the proceedings. If the allegation is unfounded, the data will be destroyed without delay.

7. Access to personal data and disclosure to third parties

Personal data is accessed and processed by those persons defined by QMG who carry out and supervise investigations. Access is granted only to persons who need access to the data for the above-mentioned purposes. The identity of the whistleblower, when known, will not be disclosed to the persons against whom the allegations are made. The identity of the whistleblower is disclosed only if the whistleblower gives their consent or if it is required in criminal proceedings or if the whistleblower submits a false report with the intention of causing harm. Personal data will be disclosed to third parties, such as authorities or external auditors, when necessary.

8. Transfer of personal data outside the EU or the EEA

Personal data will not be transferred outside the EU or the EEA

9. The data subject's influence on the processing of their own personal data



Data subjects have the right to request access to their data, to request the rectification or completion of their data if there are errors, inaccuracies or omissions in the data, to request the erasure of their personal data, to object to the processing for a reason relating to a specific personal situation, and to request the restriction of the processing of their personal data. Exercising these rights is subject to certain conditions, and QMG may have the right to reject the request. If the request is rejected, the reasons for the rejection are provided to the data subject. The data subject may send a request by email at tietosuoja@qmg.fi.

10. Questions related to the processing of personal data

Questions related to the processing of personal data can be sent to tietosuoja@qmg.fi.

11. Controller

The controller of personal data referred to in this Privacy Policy is Quattro Mikenti Group Oy.