

PRIVACY STATEMENT

1. Name of the register

Internal reporting channel for suspected misuse, WhistleBlowing

2. Register controller

Orton Oy, 2280979-1, Tenholantie 10, FI-00280 Helsinki

Official responsible for the register

Pipsa Hakasaari, pipsa.hakasaari@orton.fi, 040 663 2244

Contact information of the data protection officer

tietosuojaavastaava@orton.fi

3. Purpose of processing personal data

Receiving and processing reports of suspected misuse of data.

The Act on the Protection of Persons Reporting Infringements (1171/2022, the Whistleblower Act) entered into force on 1 January 2023. The Act implemented the Directive (EU) 2019/1937 of the European Parliament and of the Council, i.e. the so-called Whistleblowing Directive. The Whistleblower Act provides protection of persons reporting infringements of European Union or national law observed in the course of their work duties.

4. Legal basis for processing personal data

Legal obligation.

5. Categories of personal data

For example, the categories may include personal data of former and current employees and of self-employed persons.

Personal data in the register: First name, last name and email address of the notifier, notification processor and the person responsible for measures taken.

6. Regular data sources

From the data subject themselves, i.e. from the notifier, through the notification form on the data controller's intranet pages.

7. Retention period for personal data

Information received through the notification channel will be deleted no later than five years after the notification has arrived, unless retention is necessary for the exercise of the rights or obligations provided for by law or for the establishment, exercise or defense of legal claims.

8. Regular disclosures of data

As a rule, the information in the register will not be disclosed to third parties except to the authorities (such as the police) as permitted and required by law, if the data controller has a legal obligation/right to report the infringement.

9. Transfer of data outside the EU or EEA

No data will be transferred outside the EU or the European Economic Area.

10. Principles of register protection

Access to the system is restricted, and only designated persons whose job duties involve the processing of the data are allowed to process the data. The material is in electronic format and the data is only processed electronically. The supplier of the internal reporting channel system (Awanic Oy) stores personal data in a secure server facility located in Finland. Awanic Oy does not store IP addresses or other identifying information that could lead to the identification of the person submitting the notification.

11. Rights of the data subject

The data subject has the right to demand rectification of their personal data. Restriction on the rights of the data subject regarding matters concerning whistleblower protection:

- the data subject's right to restriction of processing does not apply to matters concerning whistleblower protection
- the data subject's access to data may be restricted where necessary and proportionate to ensure the accuracy of the report or to protect the identity of the person reporting the infringement.

12. Informing of data subjects

This privacy policy is attached to the notification form in the notification channel.