

## Privacy Policy

21<sup>st</sup> March 2025

### 1. Controller

Sponda Ltd (business ID: 0866692-3)  
Yrjönkatu 29 C, P.O. box 940, FI-00101 Helsinki  
tel. +358 (0)20 43131

### 2. Contact details for register matters

Sponda Ltd  
Yrjönkatu 29 C, P.O. box 940, FI-00101 Helsinki  
tel. +358 (0)20 43131  
e-mail: [privacy@sponda.fi](mailto:privacy@sponda.fi)

### 3. Name of the register

Privacy Policy of Whistleblowing Channel

### 4. Purpose and legal basis of the processing of personal data

As part of the use of whistleblowing channel, the controller process personal data of the persons who make the report to the channel and, to whom report may concern (hereafter jointly "data subject"). The data subject can be, among others, employees or representatives of the business partners of the controller.

The purpose of the processing of personal data is to investigate and prevent financial infringements and misconduct of legislation and the ethical guidelines in the controller's operations.

The basis of the processing of personal data is the controller's statutory obligation to establish channel for reporting of the infringements and the legitimate interest of the controller to ensure its employees and business partners ethical and lawful operations.

Processing tasks can be outsourced to external service providers, in accordance with and within the limits set by data protection law.

### 5. Data content of the register

Among other things, the following personal data of data subjects can be saved:

- name, date of birth/personal identity number and contact details;
- job title and role in organization; and
- other personal data included in the report or personal data collected as part of the processing the report (e.g. description and other information of the suspected misconduct).

As part of the reporting and as part of the handling of the report the controller may get also other personal data of the data subjects.

## **6. Storage period of personal data**

The data stored in the register may be stored for as long as necessary for the original purpose of the collection and processing, or for as long as required by the law and regulations.

## **7. Regular sources of data**

The controller can collect personal data of the data subjects from the data subject itself (e.g. in case the data subject makes the report at its own name). The data can be collected also from other sources than from the data subject itself. E.g. in case the report made by other data subject includes also personal data from other persons).

As part of the reporting and as part of the handling of the report the controller may get also personal data of the other data subjects, that the data subject voluntarily gives or, that the controller receives from public sources or from other sources, based on permission or requirements of the valid legislation.

## **8. Regular disclosure of data and recipient categories**

The controller retains personal data that has been reported to the whistleblowing channel with utmost confidence and in accordance with data protection regulation.

Personal data may be disclosed between the group companies of the controller. Personal data may be disclosed in connection with the sale, transfer or other disposal of a site or business.

Personal data may be disclosed to the controller's and/or its group company's service providers.

Personal data may be disclosed to competent authorities, for example, in order to identify misuse and in order to help them carry out their statutory duties.

## **9. Transfer of data outside the EU or the EEA**

Personal data may be transferred outside the European Union or the European Economic Area in accordance with and within the limits of data protection law.

The controller, the controller's subcontractors or partners may use companies that are located outside the EU or the EEA to assist in the processing of personal data, or they may use workforce or other resources that are located outside the EU or the EEA for processing personal data. It is also possible that a co-operation partner selected by the controller to which the controller decides to transfer data is located outside the European Union or the European Economic Area, for example, in the United States. The legislation of non-EU/EEA countries does not necessarily provide the same level of protection for personal data as the European Union. However, the controller tries to ensure the protection of personal data in these cases by using the safeguards required under data protection law, such as the standard contractual clauses of the European Commission.

## **10. Protection principles of the register**

### Manual material

Any manual materials are stored in a locked room that only authorised persons can access.

#### Electronically-processed data

The register is stored in electronic form, appropriately protected from outsiders with the help of firewalls and other technical measures. Only designated employees of the controller and representatives of partners have the right to process the data stored in the register.

The aim of the measures described above is to safeguard the confidentiality, availability and integrity of the personal data stored in the register and to permit the exercise of the data subject's rights.

### **11. Automatic decision-making**

Personal data is not used for automatic decision-making that would have legal or other similar effects on data subjects.

### **12. Right to object to the processing of one's personal data**

Where the ground for the processing of personal data is the legitimate interest of the controller, the data subject has the right to object to the profiling or other processing of any personal data relating to their particular situation.

The data subject may object to the processing of their personal data by submitting a request, as described in section 14 of this privacy policy. In the request, the data subject must specify the particular situation on the basis of which they object to the processing. The controller may refuse to satisfy the request under the criteria set out in legislation.

### **13. Other rights of the data subject related to the processing of personal data**

#### **Right of access to personal data**

The data subject has the right to access their personal data in the register. The access request must be made following the instructions set out in this privacy policy. The right of access can be refused on the grounds provided for in legislation. In principle, exercising the right of access is free of charge.

#### **Right to request rectification or erasure of personal data or restriction of processing**

The data subject must, without undue delay and after noticing or becoming aware of the mistake, rectify, erase or complement any data in the register that violates the purpose of the register, is incorrect, unnecessary, incomplete or outdated, if the data subject can do this him- or herself.

If the data subject cannot rectify the data, the rectification request must be submitted as described in section 14 of this privacy policy.

In addition, the data subject has the right to request the controller to restrict the processing of their personal data, for example, while the data subject is waiting for the controller's response to the rectification or erasure request.

#### **Right to move data between systems**

Insofar as the data subject has submitted data to the register that is processed on the basis of the data subject's consent, the data subject has the right to receive such data in a form that is readable by a computer and to move them to another controller's system.

**Right to lodge a complaint with a supervisory authority**

The data subject has the right to lodge a complaint with a competent supervisory authority if the controller has not complied with applicable data protection regulations in its operations.

**14. Contacts**

The data subject should contact the controller if they have any questions concerning the processing of personal data and the exercise of their rights. The data subject may exercise this right by sending a request to the controller via e-mail to [privacy@sponda.fi](mailto:privacy@sponda.fi) or by mail to Sponda Ltd, Yrjönkatu 29 C, P.O. Box 940, FI-00101 Helsinki.