

ELENIA GROUP COMPANIES' WHISTLEBLOWING PRIVACY POLICY AND RECORDS OF PROCESSING ACTIVITIES

1. Background information regarding the processing of personal data

This privacy policy (**Privacy Policy**) provides information in accordance with the European Union General Data Protection Regulation (2016/679) (**GDPR**) on how Elenia group companies, Elenia Group Oy, Elenia Oy, and Elenia Verkko Oyj (collectively "**Elenia**") process personal data in connection with the group's whistleblowing channel and the processing of whistleblowing reports. Simultaneously, this Privacy Policy forms the records of processing activities referred to in the GDPR.

The purpose of the whistleblowing channel is to prevent abuses by providing a reporting channel to report suspected or observed breaches in confidence. This Privacy Policy describes how Elenia processes personal data in the context of the whistleblowing procedure. This Privacy Policy also describes the main elements of the division of responsibilities between different Elenia companies in implementing the obligations of the GDPR in connection with whistleblowing.

Personal data means any information relating to an identified or identifiable natural person i.e. data subject. In this Privacy Policy, **data subject** or **you** refers to the whistleblower, the subject of the whistleblowing report and any other person, who may be involved in the report or its processing, such as a witness.

Please note that Elenia reviews this Privacy Policy regularly and may make changes to this Privacy Policy if the way in which personal data is processed changes, for example due to changes in legislation or Elenia's internal policies. Elenia will always publish an up-to-date Privacy Policy on its intranet and on its public website. This Privacy Policy was last updated on 14.12.2021.

2. The contents of this Privacy Policy

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3. Who is responsible for the processing of your personal data?

The controllers of your personal data are the respective Elenia group companies with regard to the personal data processed in connection with the relevant whistleblowing reports. If the whistleblowing concerns more than one Elenia group company, those companies will process the personal data as joint controllers within the meaning of the GDPR.

Elenia Oy

PL 2, Patamäenkatu 7
33901 Tampere
Business ID: 2445423-4

Elenia Group Oy

PL 2, Patamäenkatu 7
33901 Tampere
Business ID: 2869562-5

Elenia Verkko Oyj

PL 2, Patamäenkatu 7
33901 Tampere
Business ID: 3001882-6

4. Contact person for the register

Minna Huuskonen, internal auditor
e-mail: minna.huuskonen@elenia.fi
tel: +358 50 593 1982
Patamäenkatu 7
33901 TAMPERE

If you have any questions about the processing of your personal data in relation to this Privacy Policy or if you wish to exercise your rights as a data subject, you may direct your question or request to the designated contact person of the register, who will act as your primary point of contact.

5. Contact details of the Data Protection Officer

Elenia has appointed a joint Data Protection Officer, whose contact details are as follows:

Data Protection Officer, Elenia
e-mail: tietosuoja@elenia.fi
tel: +35840 579 3548
Patamäenkatu 7
33901 TAMPERE

The Data Protection Officer monitors compliance with data protection legislation in Elenia and provides information and advice on the obligations under data protection legislation.

6. For what purposes and on what basis does Elenia process your personal data in connection with the whistleblowing channel?

PROCESSING OF PERSONAL DATA		
Personal data processed	Purpose of processing	Grounds for processing
<ul style="list-style-type: none">Name and contact details of the whistleblower (reports can also be made anonymously)Information contained in the report, for example on the person or persons subject to the report and their contact details, a description of the breach or misconduct, time and place, and other information that the whistleblower considers meaningfulSupplementary information pertaining to the reported incident or relevant parties received or collected during an internal investigation	<ul style="list-style-type: none">Compliance with Elenia's statutory obligations, in particular in accordance with Section 2 of the Whistleblower Protection Act in different areas of legislationCompliance with Elenia's ethical codes of conductIdentifying, investigating and preventing potential abuses	<ul style="list-style-type: none">Compliance with Elenia's statutory obligationLegitimate interestTo the limited extent that Elenia processes sensitive personal data, the processing is necessary for

<ul style="list-style-type: none"> Names and contact details of potential witnesses or other persons involved in the case Information on the processing of the report and the communication regarding the case, and the stage reached in the processing of the report Information on the processors of the report, such as name, title, and contact details, as well as log data generated from the use of the system. 	<ul style="list-style-type: none"> Establishing, , exercising or defending legal claims 	the establishment, exercise or defense of legal claims or, in exceptional circumstances, with the data subject's explicit consent
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7. Does Elenia process your personal data based on legitimate interest?

The legal basis for the processing of personal data in the context of the whistleblowing procedure is primarily the fulfilment Elenia's legal obligations under the pertinent whistleblowing legislation. However, Elenia may process your personal data based on legitimate interest, for example when the report and the investigation pertain to a breach of Elenia's ethical codes of conduct and in context of the establishment, exercise or defense of legal claims following an investigation. Elenia may also use data relating to the whistleblowing procedure for monitoring and development of the whistleblowing procedure, as well as for statistical reporting concerning the use and effectiveness of the whistleblowing channel. For monitoring, development, and reporting purposes, however, personal information shall always be removed from the processed data as far as reasonably possible.

As a general rule, where personal data is processed on the basis of legitimate interest, Elenia will always carry out a balancing of interests with a so-called balance test before processing personal data and will only process personal data if the balance test shows that the rights and freedoms of the data subjects do not override Elenia's legitimate interest.

Where your personal data is processed based on the legitimate interest of Elenia or another party, you have the right to object to such processing on grounds relating to your particular personal situation. In such situation, Elenia may only continue the processing based on legitimate interest, when Elenia can demonstrate an important and legitimate reason for such processing or if the processing is necessary for the establishment, exercise, or defense of legal claims.

If you have any questions or comments about the processing of your personal data or this Privacy Policy, or if you wish to exercise your rights, you can contact the contact person of the register mentioned in section 4. In addition, you can always contact Elenia's Data Protection Officer mentioned in section 5 above for questions relating to the processing of your personal data.

8. Does Elenia process your personal data that is sensitive?

Sensitive personal data (so-called "special categories of personal data") include personal data concerning trade union membership, health, political opinions, religious or philosophical beliefs or sexual orientation.

In the context of whistleblowing, processing is, to the extent possible, carried out without processing sensitive personal data. Whistleblowers are instructed to assess the content of their whistleblowing reports and to include only the information necessary for the processing of the report, with particular attention to avoid unnecessary disclosure of sensitive personal data. Sensitive personal data will only be processed if the processing of such data is necessary for the proper handling of the report.

Where the processing of sensitive personal data is necessary for the purposes of the processing, Elenia will only process your sensitive personal data on the basis of an exception to the processing of sensitive personal data, such as where the data subject has explicitly made the data in question public, where the processing is necessary for the establishment, exercise

or defense of legal claims, or where the data subject has given their explicit consent to the processing of their sensitive personal data.

9. From where does Elenia obtain your personal data?

The primary source of personal data processed in the context of the whistleblowing procedure is the whistleblowing channel and the reports made through the whistleblowing channel.

During the processing of the report, the information contained in the report will be supplemented by personal data from other sources, where necessary for the purpose of the processing, such as information from Elenia's other internal registers or systems, or personal data collected during consultation of the parties concerned and other persons involved in the matter.

10. To whom does Elenia transfer or disclose your personal data?

In certain circumstances, the processing of your personal data requires the transfer or disclosure of personal data to parties outside Elenia.

Elenia has acquired the whistleblowing channel as a service from a service provider that is Elenia's contractual partner. The service provider is responsible for the technical implementation of the whistleblowing channel. Elenia has entered into a contract with the service provider on the processing of personal data in accordance with the GDPR, which includes a separate annex on data security measures to ensure confidentiality, integrity and availability of the data processed.

Elenia may disclose your personal data to recipients who become data controllers of your personal data. These recipients include, in particular, professional service providers such as Elenia's auditor and financial and legal advisors, where required for Elenia's operations. Elenia may also disclose your personal data to authorities to the extent required by law or to investigate possible suspicions of misconduct or to launch an investigation, or if the report contains information that gives rise to a suspicion of a criminal offence.

11. Does Elenia transfer your personal data to third countries?

As a rule, your personal data will not be transferred outside the European Union (EU) or the European Economic Area (EEA).

However, if the transfer of personal data outside the EU or EEA is necessary for the above-mentioned purposes for which the personal data is processed or for the technical implementation of the processing, Elenia may also transfer your personal data outside the EEA. The level of data protection outside the EEA may be lower than in the EEA. In such a situation, Elenia will implement appropriate safeguards to ensure the protection of your personal data, such as the Standard Contractual Clauses issued by the European Commission.

12. How long will Elenia retain your personal data

Elenia will retain your personal data for as long as necessary for the purpose of the monitoring or to comply with legal obligations. As a rule, personal data will be deleted two months after the end of the measures relating to the suspected breach. Data relating to clearly unfounded reports will be deleted immediately.

Notwithstanding the above, Elenia may be obliged or entitled to retain your personal data for longer than is necessary for the purposes of a particular processing operation, for example in the following situations:

- Legislation, regulations or regulatory guidelines require to retain personal data for a longer period;
- Retention of personal data is necessary to protect the rights of the whistleblower or the person subject to the report; or

- Retention of personal data is necessary to verify that Elenia has fulfilled its statutory obligations, or to investigate, defend or respond to legal claims.

Personal data can be compiled into anonymous statistical data, which can be stored without time limits.

13. How does Elenia protect your personal data?

Your personal data stored in electronic format is protected by reasonable technical measures generally accepted within Elenia's industry, such as firewalls and passwords. Non-electronic material containing your personal data is located in locked premises, which are inaccessible to unauthorised persons.

The cloud service where the whistleblowing channel is hosted is certified according to ISO 27001 (information security) and ISO 27018 (protection of personally identifiable information in public clouds) standards.

Only designated employees of Elenia, its service providers acting on its behalf and for its account, or professional service providers acting as independent data controllers, have access to your personal data in accordance with the personal access rights granted by Elenia. The persons processing the reports are bound by a legal obligation of confidentiality. For Elenia employees involved in the processing of your personal data, Elenia regularly organizes trainings to ensure the necessary expertise for the processing of personal data.

Elenia takes into account the applicable legislation and regulations and guidelines of the authorities and industry associations to ensure the confidential processing of your personal data.

14. Key elements of the division of responsibilities between Elenia's joint controllers in the context of the whistleblowing procedure

The controllers of your personal data are the respective Elenia group companies with regard to the personal data processed in connection with the relevant whistleblowing reports. If the whistleblowing concerns more than one Elenia group company, these companies will process the personal data as joint controllers within the meaning of the GDPR.

Elenia group companies process personal data in connection with the whistleblowing channel only in accordance with the channel policy and this Privacy Policy. Each group company processes personal data only to the extent necessary, which is determined on a case-by-case basis. However, each group company is always responsible for ensuring compliance with data protection legislation in relation to its own activities.

The contact person for the register, mentioned in section 4 above, will act as your primary point of contact for questions and requests regarding your personal data related to the whistleblowing channel. You can contact the contact person if you have any questions regarding the processing of your personal data in the context of the whistleblowing procedure or if you wish to exercise your rights as a data subject. In addition, you can always contact Elenia's Data Protection Officer mentioned in section 5 for questions relating to the processing of your personal data.

15. What rights do you have regarding your personal data?

Under data protection legislation, as a data subject you have by default the rights listed below in relation to your personal data processed by Elenia. **Please note, however, that these rights are not absolute and that there are exceptions and conditions for the exercise and/or limitation of each right provided for in the legislation and any regulations and guidelines issued by the authorities, which are not exhaustively described below.** Elenia reserves the right to limit the exercise of the rights set out below, for example, in situations where the exercise of your request would adversely affect the rights of others or where the limitation is

necessary for the prevention, investigation, detection or prosecution of a criminal offence or for legal proceedings such as the establishment, exercise or defense of legal claims.

- **Right of access to personal data:** You have the right to receive confirmation on whether Elenia is processing your personal data. If Elenia does process your personal data, you also have the right to be informed, for example, of the purpose of processing your personal data.
- **Right to rectification of personal data:** You have the right to request Elenia to correct your inaccurate or incorrect personal data.
- **Right to erasure of personal data:** You have the right to request Elenia to delete your personal data, for example, if your personal data is no longer needed for the purposes for which they were collected or if the processing of your personal data is unlawful.
- **Right to object to the processing of personal data:** You always have the right to object to the processing of your personal data for direct marketing and other commercial communications. In addition, you have the right to object to the processing of your personal data based on legitimate interest on grounds relating to your particular situation, unless Elenia demonstrates compelling legitimate grounds for the processing.
- **Right to withdraw consent:** If you have given your explicit consent to a particular processing, you may withdraw your consent at any time. However, withdrawing your consent does not affect the lawfulness of the processing performed before such withdrawal.
- **Right to restriction of processing:** You have the right to restrict the processing of your personal data while Elenia is investigating and verifying your request.
- **Right to lodge a complaint with the supervisory authority:** If you are not satisfied with the answer given by Elenia or if you believe that Elenia is processing your personal data unlawfully, you can contact the national data protection authority, which in Finland is the Data Protection Ombudsman.

You can exercise your rights described above by contacting the contact person for the register mentioned in section 4. In addition, you can always contact Elenia's Data Protection Officer mentioned in section 5 for questions concerning the processing of your personal data.

Please note that Elenia may ask you for further information before your request can be further processed. Elenia will also need to identify you. If you do not provide the additional information necessary to carry out your request or if you cannot be identified, Elenia has the right to refuse to process your request. Otherwise, Elenia will respond to your request within the timeframe and in the manner required by the law.

16. Who can I be in contact with about the processing of my personal data?

If you have any questions or comments about the processing of your personal data or this Privacy Policy, or if you wish to exercise your rights, you can contact the contact person for the register mentioned in section 4. In addition, you can always contact the Data Protection Officer of Elenia mentioned in section 5 above in case of questions related to the processing of your personal data.