

MIRKA

 **KWH LOGISTICS**

 **KWH FREEZE**

PREVEX

KWH Group Ethics Line channel privacy statement

8th January 2024, version 1.0



Table of Contents

1.	Data controller	2
2.	Personal data processed by KWH.....	3
3.	Purposes of processing.....	3
4.	Regular sources of information.....	3
5.	Transfers of personal data and access to data	4
6.	Retention period of personal data.....	5
7.	Rights of the data subject.....	5

The KWH Group consists of four business groups: Mirka Oy, which specialises in abrasives, KWH Logistics, which provides logistics services, KWH Freeze Oy, which offers frozen storage, and KWH Invest Oy, which consists of both strategic holdings and Prevex Oy, which manufactures water traps. The KWH Group has established a group-wide Ethics Line channel for reporting Code of Conduct violations and other misconduct. References in this Privacy Policy to "KWH" or "Company" refer to KWH Group Ltd, including all its business groups, subsidiaries, branches and other entities over which KWH Group Ltd exercises managerial control.

This Privacy Policy contains general information on the processing of certain personal data defined below by KWH and its employees in connection with the use of KWH's Ethics Line channel, through which various actors can report violations of the KWH Code of Conduct and other suspected misconduct.

1. Data controller

KWH Group Ltd and other KWH Group companies defined above, as applicable.

- KWH Group Ltd
- Kauppapuistikko 15, 6th floor
- 65100 Vaasa, Finland
- Telephone: 020 778 7900
- E-mail: info@kwhgroup.com



2. Personal data processed by KWH

KWH employees, customers, subcontractors and other persons related to KWH in any way ("Reporter") may report violations of KWH Group's legal or regulatory obligations, KWH Group's Code of Conduct or KWH Group's Business Partners' Code of Business Principles through the Ethics Line. In connection with reporting, certain personal data may be collected and processed about the Reporter and the subject matter of the report.

Personal data obtained through the channel may include, for example, the following personal data:

- First and last name
- Language
- Contact information (e.g. email and phone number)
- Role and job title
- Sex
- Details of the suspected misconduct reported

The report can be made anonymously if so permitted by law. In such cases, KWH does not have access to the name or contact details of the Reporter.

This personal data is referred to in this privacy policy as "personal data". Sensitive personal data is not intended to be collected or processed.

3. Purposes of processing

KWH processes personal data to investigate reports made to KWH's Ethics Line. KWH processes personal data to ensure that KWH, KWH employees, KWH suppliers and other KWH partners comply with local legislation and regulatory requirements, contractual obligations and other legal obligations. The legal basis for the processing is KWH's legal obligations and the legitimate interest of the KWH Group.

Automated decision-making is not used.

4. Regular sources of information

Data is collected through Ethics Line when a person reports experienced or reasonably suspected misconduct, and during the further investigation process. During the investigation, the Reporter may be contacted and asked for additional information and the accuracy of the personal data may be verified (if the persons can be identified from the report). Depending on



the nature of the report and the applicable local laws, also other sources can be used when investigating the report, such as other persons involved in or having knowledge about the case or KWH IT systems from which evidence may be gathered.

5. Transfers of personal data and access to data

The reporting tool for KWH's Ethics Line channel is provided by People Intouch B.V., a Dutch company incorporated under the laws of the Netherlands with its registered office at **Olympisch Stadion 41, 1076 DE Amsterdam, The Netherlands**. People Intouch's servers where the reported data is processed are located in the Netherlands. KWH has entered into a data processing agreement with People Intouch.

Data is protected in accordance with People Intouch's Privacy Policy. The reports are available to relevant People Intouch employees and, if necessary, translators. As a rule, translations are done as automatic machine translation. All persons handling reports, People Intouch employees and translators are bound by professional secrecy.

Password-protected access rights to data within KWH's organization is strictly limited to designated persons from KWH's Compliance team. KWH's Compliance Team will keep this information confidential and will only share the content of the reports with other relevant stakeholders within KWH Group or other KWH companies, such as global or local HR, legal, internal control or cybersecurity re-presentatives, as necessary to investigate and resolve each individual reported incident. Taking into account KWH's legitimate interest in investigating and resolving reported cases, KWH will use its best endeavours to keep the amount of personal data shared to a minimum, for example by sharing the report with these relevant stakeholders in anonymous form (where possible) and involving only persons who are relevant for the investigation or resolution of the case. Reports will not be shared between different KWH companies unless necessary to investigate or resolve the case.

KWH may process personal data in jurisdictions in which KWH operates. Therefore, personal data may be processed within the EU/EEA and outside the EU/EEA. KWH transfers your personal data outside the EU/EEA only on one of the legal bases described below:

- The European Commission considers that the recipient country provides an adequate level of protection for your personal data;
- we have put in place appropriate safeguards for the transfer using standard contractual clauses for transfers of personal data to third countries published by the European Commission; or
- you have given your consent to the transfer or there is another legal basis for the transfer in accordance with applicable data protection legislation.



6. Retention period of personal data

Personal data will only be stored for as long as it is necessary and justified for the processing of reports, internal investigations or legal proceedings or applicable national law. Retention periods are regularly evaluated.

7. Rights of the data subject

Data subjects whose personal data is collected through the Ethics Line have the right to:

- To request access to and rectification of their personal data;
- In certain cases to request erasure of their personal data or restrict or object to the processing.

You can exercise the above rights by visiting us personally or by contacting us at the address and other contact details set out in section 1. KWH will always verify your identity before processing your request.

Please note that your rights may be denied if the processing of your personal data is necessary for the ongoing investigation of the alleged misconduct or to comply with legal obligations applicable legislation.

If you are dissatisfied with the way we process your personal data, you have the right to lodge a complaint with the competent supervisory authority responsible for monitoring compliance with applicable data protection legislation.