

Privacy Statement of Oy Halton Group Ltd's Fair Play Forum

1 General

Oy Halton Group Ltd (later "Company" or "We") is committed to ensure the confidentiality and data protection of personal data at its possession. This privacy statement is applied to personal data that we collect in relation to our Fair Play Forum (later "Data Filing System"). The personal data and related processing is described in this privacy statement. Additional information regarding the processing of personal data in the Data Filing System is provided by our contact person Kenny Niutanen.

We may update this privacy statement from time to time, for example due to changes in applicable legislation. We endeavour to carry out reasonable means to inform you of any possible changes and their effects in due time beforehand. Therefore, we advise you to review this privacy statement always after receiving a notice of changes regarding the privacy statement. This privacy statement was last updated on 29.03.2023.

2 Data Controller

Name: Oy Halton Group
Address: Haltonintie 1-3
47400 Kausala
Tel: +358 (0)20 792 200
Business ID: 3331061-1

3 Whose Personal Data Do We Collect?

In the Data Filing System we process the personal data concerning persons who have reported alleged misconducts and violations via Halton Fair Play Forum ~~and persons who are accused of these alleged misconducts or violations~~ (hereinafter "You").

4 What Categories of Personal Data Do We Process?

We process the personal data submitted to us via reports of the Fair Play Forum, which may include the following categories of personal data, in the Data Filing System:

Persons filing the report

- name;
- contact details: telephone number, address, email address;
- date of the report; and
- other information provided in the report.

~~Persons accused of alleged misconducts or violations~~

- ~~— name;~~
- ~~— contact details;~~
- ~~— description of the alleged misconduct or violation, investigation procedure and outcome of the investigation; and~~
- ~~— date on which the person was included to the register.~~

The Company encourages reporting misconduct and violations on a named basis, but reports can also be made on an anonymous basis. No personal data regarding the person filing the report, shall be processed in the Data Filing System, other than the data submitted by that person in the report.

5 Which Sources Do We Use to Collect Personal Data?

We collect personal data from the reporting person and persons involved in the investigation of the alleged misconduct or violation.

6 Basis for, Purposes and Impacts of Processing Your Personal Data

The processing of your personal data is based on ~~our [legitimate interest](#), [the fulfilment of our legal obligations](#) based on national and EU regulation which require us to have appropriate internal procedures in place to enable report infringements of financial markets regulations.~~

The purpose of the processing of personal data is to investigate the alleged misconducts and violations of the Company's code of conduct and other relating policies and to comply with the regulations governing the procedures. The processing of your personal data will have no other impact on you.

7 Regular Disclosures and Transfers of Your Personal Data to Third Parties

We may disclose your personal data to competent authorities such as the Finnish Financial Supervisory Authority as may be required by law.

8 Transfers of Your Personal Data outside the EU or European Economic Area

Your personal data is not regularly transferred to countries outside the European Union or the European Economic Area. However, it may be transferred in an individual case if needed for the purpose of effective investigation of the alleged misconduct or violation.

In all situations, we transfer your personal data outside the EU or the European Economic Area only based on the lawful grounds mentioned below:

- the EU Commission has decided that the recipient country in question ensures an adequate level of protection;
- we have established appropriate safeguards for the transfer of personal data such as the standard data protection clauses approved by the Commission. You shall then have the right to obtain a copy of such standard clauses by contacting us in the manner described in the section 'Contacts'; or
- you have given your explicit consent for the transfer of your personal data or another lawful basis for the transfer of your personal data outside the EU or EEA exists.

9 Principles for the Retention of Your Personal Data

We retain your personal data in the Data Filing System for the duration of the investigation and the period of time when a possibility of any legal proceedings related to the reported misconduct or violation exists.

10 Rights of a Data Subject in Relation to the Processing of Personal Data

You have the right to, according to applicable data protection legislation, at any time:

- be informed about the processing of your personal data;
- obtain access to data relating to you and review your personal data we process;
- require rectification and completion or erasure of inaccurate and incorrect personal data; and
- obtain a restriction of processing of your personal data.

You should present your request for exercising any of the aforementioned rights in the manner described in the 'Contacts' Section of this privacy statement. We may ask you to specify your request in writing and to verify your identity before processing the request. We may refuse to fulfil your request on grounds set out in applicable data protection legislation.

You also have the right to lodge a complaint with the supervisory authority concerned or with the supervisory authority of the EU member state of your habitual residence or place of work, if you consider that we have not processed your personal data in accordance with applicable data protection legislation.

11 Principles of Data Security

We respect the confidentiality of your personal data. Access to the Data Filing System is protected by passwords. Access to the Data Filing System is restricted to employees who need to access the Data Filing System due to the nature of their position. Tangible material containing personal data shall be kept under lock and key in a space to which only separately appointed persons have access. Personal data processed digitally are protected and stored in our information system accessible to persons on a need-to-know basis only. Such persons have personal user credentials and passwords. We encrypt Personal data transmitted outside our Company.

12 Contacts

All requests concerning the use of the rights mentioned above, questions about this privacy statement and other contacts should be made by e-mail to the address kenny.niutanen@halton.com. You may also contact us in person at your workplace or in our other offices or in writing:

Oy Halton Group Ltd
Kenny Niutanen
Haltonintie 1-3
47400 Kausala, Finland