

Privacy policy of the whistleblowing channel register of Vaasan Sähkö Group

1. Controller

Vaasan Sähkö Oy ("controller") Business ID: 0209628-8

Vaasan Sähköverkko Oy ("controller") Business ID: 1993667-7

Visiting address:

Kirkkopuistikko 0, 65100 Vaasa

Postal address: PO Box 26, 65101 Vaasa

Telephone: +358 6 324 5111

Website: <http://www.vaasansahko.fi>

2. Name of the register

Vaasan Sähkö Group's whistleblowing channel register, which includes the shared reporting channel of Vaasan Sähkö Oy and Vaasan Sähköverkko Oy.

3. Person responsible for the whistleblowing channel register

Person responsible for the whistleblowing channel register: **Olli Arola**,
olli.arola@vaasansahko.fi.

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 address your questions or requests in writing to the contact person responsible for the register designated herein.

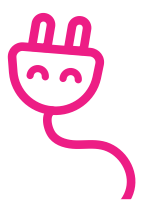
4. Contact details of the data protection officer

Vaasan Sähkö Group has appointed a joint data protection officer, whose contact details are as follows:

Data protection officer, Vaasan Sähkö Group

Address: Tietosuojakyselyt, PO Box 26, 65101, Vaasa

Email: tietosuoja@vaasansahko.fi



The data protection officer monitors Vaasan Sähkö Group's compliance with data protection legislation and provides information and advice on the obligations under data protection legislation.

5. Purpose and basis of processing personal data

The controller collects and processes personal data to investigate reported or suspected misconduct involving its employees or its contractors' or subcontractors' employees.

Personal data processed

- The name and contact details of the whistleblower. It is possible to report anonymously.
- The information included in the report, such as the subject or subjects of the report, their contact details, and a description of the suspected breach or misconduct.
- The names of any witnesses or other persons involved in the case and their contact details.
- Information revealed or collected in the internal investigation concerning the subject matter of the report or the parties involved in it.
- Information concerning the processing of the report and the communication used for the investigation.
- The names, job titles, contact details and other information on the persons processing the reports and log data generated by the use of the system.

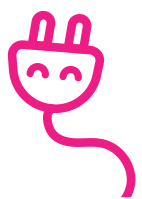
Purpose of processing

- To comply with the legal obligations of the controller and the obligations of the European Union and national law on the protection of persons who report breaches.
- To investigate and prevent possible misconducts and breaches.
- To determine compliance with the controller's code of conduct.

Basis for processing

- Compliance with the controller's legal obligations.
- Legitimate interest based on the need to investigate reported or suspected misconduct.

The legal basis for the processing of personal data in connection with the whistleblowing process is primarily to comply with the legal obligations of the controller under the whistleblower



protection act. However, the controller may process your personal data on the basis of legitimate interest, for example, if a whistleblowing report concerns violations of the controller's code of conduct or in connection with the establishment, exercise or defence of legal claims. The controller may also use the information related to the whistleblowing processing to monitor and develop the whistleblowing procedure and to report statistics on the use and effectiveness of the whistleblowing channel.

6. Regular data sources for the register

The primary source of personal data processed in connection with whistleblowing processing is the whistleblowing channel and the reports made within the whistleblowing channel.

The information contained in a report will be supplemented, in connection with the processing of the report, by personal data available from other sources which are necessary for the purpose of the processing, such as data available from other internal registers or systems of the controller, or personal data collected in consultation with the parties concerned and persons involved in the events.

7. Data retention period

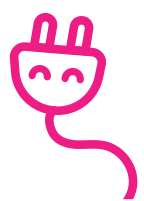
Personal data will be retained for as long as necessary for the purposes for which the personal data are processed, as defined in this privacy policy, taking into account the constraints and obligations imposed by law.

As a rule, personal data will be erased one year after the end of the measures related to the suspected misconduct. Data relating to manifestly unfounded reports will be erased without delay after processing is completed.

8. Disclosures and transfers of personal data

As a rule, the controller does not disclose personal data in this register to another controller. If necessary, personal data may be disclosed to the authorities.

If necessary, the controller may transfer personal data to a partner providing services related to the whistleblowing channel. In this case, the party in



question processes the personal data on behalf of the controller and is contractually obliged to keep the data confidential.

The controller may transfer the personal data it has registered to other personal data registers and to different companies within the same group.

9. Transfer of data outside the European Union or the European Economic Area

The data in the register is not transferred out of the European Union (EU) or the European Economic Area (EEA). If data is transferred outside the EU or EEA, this will be agreed separately, and the reliability of the processing of personal data will be duly ensured through contractual arrangements.

10. Automated decision-making

The data in the register will not be used for automated decision-making.

11. Principles of register protection

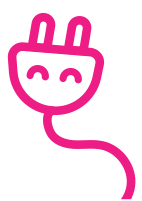
Access to personal data is limited to those persons who need the data as part of their work.

Access to data in digital format is restricted by access rights, and the data is also protected during processing by other technical means, such as encryption, firewalls and other security measures.

12. Rights of the data subject

As a data subject you have the right to:

- request access to your personal data and obtain a copy of the personal data we process about you
- request the rectification of your personal data and, in certain circumstances, request the erasure of your personal data
- withdraw your consent and, in certain circumstances, request restriction of processing or object to processing
- in certain circumstances, receive your personal data in a commonly used and machine-readable format and request the transfer of your data to another system.



Read more about your rights. <https://www.vaasansahko.fi/en/your-rights-as-customer/>.

The exercise of data subjects' rights under data protection regulations will also take into account any limitations imposed by other legislation.

You can exercise the above rights by writing to the contact person responsible for the register (see section 3 of this policy). If you have questions regarding the processing of your personal data, you can also contact the data protection officer (see section 4).

Please note that the controller may ask you for further information before processing your request further. The controller must also identify you. If you do not provide the additional information necessary to fulfil your request or if you cannot be identified, the controller has the right to refuse to process your request.

Otherwise, the controller will respond to your request within the timeframe stipulated by law and in accordance with the law.

If the data subject considers that their legal rights have been infringed, they may contact the data protection authority. Contact details for the data protection authority can be found at www.tietosuoja.fi.

13. Changes to the privacy policy

The controller is constantly developing its business and therefore reserves the right to change this privacy policy by posting the changes on its website. Changes can also be based on changes in legislation. The controller recommends that data subjects consult the contents of the privacy policy on a regular basis.

