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## Data Protection Principles regarding Elisa's Whistleblowing channel

### 1 Object of the Principles

These Data Protection Principles applies to Elisa's channel for reporting suspected misconduct (Whistleblowing) used by all Elisa Group companies.

### 2 Controller

The controller is Elisa Corporation and the subsidiaries under its control.

Elisa Oyj  
P.O. Box 1  
00061 ELISA

E-mail: [tietosuojaavastaava@elisa.fi](mailto:tietosuojaavastaava@elisa.fi)

Data Protection Officer is Elisa's Data Protection Officer.

### 3 Categories of Personal Data Processed

Anyone of Elisa's stakeholders can report suspected violations to Elisa's anonymous whistleblowing channel. In connection with notifications, the personal data of the informants, Elisians, Elisa's subcontractors or other persons included in the notification may be processed.

The procedure does not restrict the information contained in the notification. The procedure shall process personal data necessary for the examination of the notification. The procedure is legally limited to factual and work-related information.

### 4 Purposes of Processing

Personal data is processed for the purpose of identifying, monitoring, and addressing deficiencies, grievances and violations related to compliance with laws and binding practices, such as compliance with the Elisa Code of Conduct or other policies and guidelines. Personal data is processed for purposes that are necessary to investigate and process the notifications made.



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Based on the EU Whistleblowing Directive<sup>1</sup>, the reporting channel is also used for reporting violations of legislation in accordance with national laws ("Whistleblower Protection Legislation") enacted in EU member states.

## 5 Legal basis for Processing

The main legal basis for processing is legal obligation when the notification concerns an obligation under the Whistleblower Protection Act or other applicable legislation. Processing based on a legal obligation may take place, for example, in situations where the notification concerns a violation of competition law, consumer protection legislation, data protection legislation or other laws falling within the scope of the Whistleblower Protection Legislation.

In other cases, the basis for processing is the company's legitimate interest, which is based, among other things, on Elisa's obligation to ensure that its operations are legal and comply with applicable legislation, as well as the effort to promote a responsible, safe, and ethical operating culture. Processing based on Elisa's legitimate interest may take place, for example, in situations where the report concerns violation of Elisa's Code of Conduct, for which there is no legal basis for processing.

The processing is necessary for the legitimate, clearly identifiable interest of Elisa and the processing is carried out in a manner that is compatible with the rights and interests of the data subject.

The procedure enables confidential processing of notifications. The interests and rights of the reporters and the subjects of the report are duly considered during the investigation and subsequent decision-making.

## 6 Source of Personal Data

The source of personal data are the reporters. Necessary information can also be collected from other sources, for example from Elisa's other registers.

## 7 Recipients of Personal Data

In principle, Elisa does not disclose information to third parties.

However, Elisa may disclose information to the authorities and the person concerned on a case-by-case basis, if the conditions laid down by law are met, for example in the context of criminal investigations or legal proceedings.

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<sup>1</sup> Directive of the European Parliament and of the Council (EU) 2019/1937 on the protection of persons who report breaches of Union law.



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## 8 Transfer of Data to Third Countries

Elisa uses subcontractors in producing the Whistleblowing channel and in other Elisa operations. When using subcontractors, Elisa ensures that when they process personal data, they comply with Elisa's data protection principles and treat the data with care and confidence. Elisa ensures this through contracts, audits of subcontractors' operations and the security tools Elisa provides to subcontractors.

Personal data may be processed outside Finland or EU/EAA area. In this case, Elisa ensures that the processing entity acts in accordance with Elisa's data protection principles, carefully and appropriately. The legality of the transfer of personal data is ensured, for example, by model clause agreements approved by the EU Commission.

If necessary, personal data is processed between Elisa Corporation and its subsidiaries.

## 9 Criteria for determining the retention period of Personal Data

Personal data is deleted when their processing is no longer necessary. Personal data retention periods are based on overall consideration and, as a rule, notifications and related information are deleted five years after the end of the investigation. The minimum and maximum retention periods laid down by law shall be considered in determining the retention periods. The retention period has been determined with regard to the existence of legal safeguards for the various parties to ensure that data which may be needed later is not destroyed.

## 10 Rights of the Data Subject

Elisa strives to fulfill the data subject's rights according to the EU's General Data Protection Regulation, however, taking into account the limitations of other mandatory legislation. The implementation of the rights of data subjects also takes into account the impact of the implementation of rights on the processing and investigation of reports and on measures to ensure the preservation of the investigation material.

*Right to inspect their own data:* Each person has the right to review the data on themselves.

For example, in Finland, the right of inspection of a registered person can be limited in accordance with the Whistleblower Protection Act<sup>2</sup>, if it is necessary and proportionate to ensure the accuracy of the notification or to protect the identity of the reporter.

If only part of the data concerning the data subject is such that it falls outside the aforementioned right of inspection, the data subject has the right to know other information concerning him/her.

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<sup>2</sup> The Act on the Protection of Persons Reporting Infringements of European Union and National Law (1171/2022, Whistleblower Act)



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The data subject has the right to know the reasons for the restriction of the right of inspection and to request that the data be provided to the Data Protection Supervisor.

*Right to request rectification:* A person has the right to demand that Elisa rectify inaccurate or incorrect information concerning him/her. The correction must be made without undue delay. The person also has the right to supplement incomplete personal data, e.g., by providing an additional explanation.

*Right to request erasure or restriction of processing or to object to processing:* When processing is based on the controller's legitimate interest, the data subject has the right to object to the processing. When the processing is based on the Act on the Protection of Whistleblowers, the data subject does not have the right to restrict the processing.

If the processing of personal data is no longer justified, the person has the right to request the erasure of the data.

In addition, the data subject has the right to lodge a complaint concerning the processing of personal data with a supervisory authority.

