

Privacy policy – Orthex Whistleblowing Channel

1. Controller and contact information in register matters:

Orthex Corporation
Suomalaistentie 7
02270 Espoo
Phone. +358 (0)19 329 61
privacy@orthexgroup.com

2. For what purposes and on what basis do we process your personal data?

The purpose of this Privacy Policy is to describe the ways Orthex collects, stores, uses, manages and processes personal data in relation to Orthex's whistleblowing channel. Orthex offers a whistleblowing service that enables any stakeholder (including Orthex's employees, customers, other contacts and external stakeholders) to alert the company on a suspicion of misconduct within Orthex (such as financial ambiguities, conflicts of interest, bribery, abuse, and other illegal activities). The alert can be submitted anonymously without entering any personal data, but personal data can be added voluntarily if so wished.

In case personal data is submitted, it may be stored, used and otherwise processed by Orthex for the purpose of investigating the alert. The personal data is collected from the submitter of the alert and any publicly accessible sources. The personal data may include name, contact information, position and any other information submitted or otherwise collected in the course of investigating the alert.

The data is used to monitor and investigate irregularities. In addition, the data can be used for control development, analysis and statistics.

3. What kind of personal data do we process and where do we collect the data?

The register may contain the following information: name, e-mail address and telephone number of the notifier (the notification may also be made anonymously); information in the report, such as the name of the object, information related to the illegal activity (including place and time); witness information; information related to the submission and processing of the notification and messages (incl. notification status) or any other information provided by the notifier himself.

4. To which parties do we disclose data and transfer data outside the EU or EEA?

As a rule, we do not disclose your personal data further outside the Orthex Group, nor do we transfer your personal data outside the EU or EEA.

In cases of alleged criminal offences, your personal data may need to be disclosed during judicial proceedings. You will be notified of any such disclosure.

5. How do we protect data and how long do we store it?

Data is stored in information systems that use both technical and programmatic means to ensure data security and to control the use of data. The data is processed only by Orthex employees who are entitled to see the information for each case. Each user has their own username and password for the system. The information is collected in databases that are

protected by firewalls, passwords and other technical means. The databases and their backups are located in locked spaces and can only be accessed by certain pre-designated individuals.

The data shall be kept for as long as is necessary for the purpose of the control or due to legal obligations. In principle, alert data shall be retained for 2 months from the completion of the report related to the alert, unless further retention is necessary due to an ongoing criminal, judicial or official investigation or to safeguard the rights of the notifier or the person subject to the alert.

6. Your rights as a data subject in connection with the processing of data

Requests for the rights of data subjects must be sent to the address mentioned in paragraph

1. As a data subject, you have the following rights:

- Right to access and right to request rectification and erasing of data
 - You have the right to inspect the data stored in the personal data file concerning you and the right to request the rectification of incorrect data and the erasure of the data.
- Right of objection and right to restriction of processing
 - You have the right to object or request restrictions on the processing of your data.
- Right to file a complaint to a supervisory authority
 - You have the right to file a complaint with a supervisory authority, especially in the EU Member State where your permanent place of residence or place of work is located, or where the alleged infringement has occurred, if you consider that the processing of personal data concerning you violates the EU General Data Protection Regulation.