

## Records of processing activities – RePe-Channel

Based on the Regulation (EU) 2016/679 of the European parliament and of the council, known as General Data Protection Regulation (GDPR), Article 30.

### 1. Controller

Destia Ltd  
Business ID: 2163026-3  
PO BOX 206  
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### 2. Contact Person

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### 3. The name of the register, the purpose of the usage and the retention of the personal data

Destia Ltd and its group companies (hereinafter together “**Destia**”) notification channel register (“**RePe-Channel**”). Personal data is processed, as described in more detail below, to monitor and ensure compliance with Destia's Ethical Guidelines and other internal regulations as well as laws and agreements binding on Destia, and to prevent, detect and investigate possible crimes, violations or other misconduct in Destia's operations. The misconduct described above refers for example to activities such as bribery and other activities in violence with competition law, audit matters, equality issues and other reprehensible activities that may occur in Destia. Personal data is also processed for the establishment, exercise and defense of legal claims as well as for statistical and internal reporting of cases. The purpose is to ensure that the decision-making and internal control system functions properly.

The purpose of the usage and retention of personal data is to implement the measures described above.

### 4. The information content of the register

The following information can be processed in the register:

- Identification information of the parties involved (such as the subject of the notification and the notifier)
  - Name
  - Identity number
  - Other contact information, such as address, phone number
- Information related to the employment of the subject of the notification, such as work assignments and the name of the supervisor and the unit
- Suspected crime, violation or abuse and its content
- The manner in which the abuse was committed and disclosed, as well as the evidence related to the case
- Notifier's request for anonymous processing of the notification

The aforementioned personal data, concerning the subject of the report and those Destia's employees or persons belonging to its stakeholders who are found to be involved in the suspected misconduct on the basis of the report, can be processed in the register. The data will only be processed by persons specified by the controller in the clearing process. In the register can also be processed the change data for all the data types listed above.

### 5. Regular sources of information

Information provided by the notifier through Destia's notification channel. In Destia's notification channel, information can be reported by all Destia's current and former employees, employees or persons otherwise assigned to Destia, as

well as by persons outside Destia who have a relevant connection to Destia's business, such as employees of Destia's partners or subcontractors.

In accordance with the GDPR, personal data can also be updated and collected from Destia's other internal registers and from authorities and companies providing personal data services or from Destia's partners.

## **6. Regular disclosures and transfers outside the EU or the European Economic Area**

The data will not be disclosed to parties outside Destia's group companies, except in the exceptional circumstances described below.

The data may, at the discretion of the controller, be disclosed within the limits permitted and required by the legislation in force at the time. In principle, the disclosure of data may only take place for purposes that support the mission of Destia's personal data register and where the purpose of the data is not incompatible with Destia's purposes.

The information may be disclosed in accordance with the requirements of the applicable legislation, as required by the competent authorities or other equivalent entities.

Information may also be disclosed to buyers in connection with corporate reorganizations if Destia sells or otherwise reorganizes its business.

As a rule, personal data will not be transferred outside of the Member States of the European Union or the European Economic Area unless necessary for the purposes of the processing of personal data or the technical implementation of the processing, in which case the transfer complies with the GDPR.

## **7. Security principles of the Register**

Destia's notification channel is implemented in Juuriharja Consulting Group Oy's First Whistle -system. The electronically processed information in the register is protected by firewalls, passwords and other technical means generally accepted in the security industry. On websites and other services, information is protected by an SSL-secured connection and other necessary means. Technically, each notification made through Destia's notification channel includes:

- an identifier, i.e. a number known only to the notifier
- information on the status of the notification: received / pending / processed
- possibility to request and reply to additional information without further details

Only identified employees of the controller have access to the data contained in the register with the right of access granted by the controller. The notifier can only see his or hers own notification in the service.

## **8. Right of prohibition, inspection and rectification of the data subject**

The data subject has the right under the GDPR to check the information about him or her stored in the register. The request for verification shall be made with a personally signed written request to the contact person of the controller. The controller may charge a reasonable fee for providing the information if the data subject exercises his right of inspection more than once a year. The data subject has the right to demand the correction of incorrect information by contacting the contact person of the data controller.