



Privacy Notice for Whistleblowing

Introduction

Partsnord Europe AB is steadfast in its commitment to fostering an environment of ethical conduct, integrity, and corporate responsibility. This Privacy Notice delineates the framework for processing personal data submitted through Partsnord Europe AB's designated whistleblowing channel. It is designed to ensure robust protection of personal data in full compliance with applicable data protection legislation and established confidentiality obligations. This Notice is directed to any individual who submits a report or is referenced within a report facilitated via Partsnord Europe AB's Whistleblowing Hotline.

Data Controller

Partsnord Europe AB, with its registered office at Torshamnsgatan 27, SE-164 40 Kista, Sweden, is designated as the Data Controller for all personal data processed in connection with reports made through the whistleblowing channel.

1. Safeguarding of Personal Data in Whistleblowing Reports

Reports submitted through the whistleblowing channel may inherently contain personal data. Partsnord Europe AB is unequivocally committed to the rigorous protection of such personal data, adhering strictly to all pertinent legal statutes governing data protection and fulfilling all contractual confidentiality undertakings with its employees and external third parties.

2. Categories of Personal Data Processed

The Partsnord Europe AB Whistleblowing Hotline is designed to capture the following categories of personal data and associated information:

- 1) The identity and contact information of the reporting individual (unless the report is submitted anonymously), including their employment status with Partsnord Europe AB, if disclosed.
- 2) The names and other personal data of individuals identified within the report, to the extent such information is provided by the reporter.
- 3) A comprehensive description of the alleged misconduct, inclusive of the specific circumstances and details pertaining to the incident(s) reported.

The submission of sensitive personal data (including, but not limited to, data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, health information, or data concerning an individual's sex life or sexual orientation) is expressly discouraged unless strictly essential for the substantive understanding of the reported concern. Any such sensitive data received will be expunged unless its processing is permissible under applicable law and deemed absolutely indispensable for the conduct of a thorough investigation.

3. Legal Basis for Personal Data Processing

The processing of personal data by Partsnord Europe AB in this context is predicated on the necessity to fulfill its legal obligations arising from the EU Whistleblowing Directive (2019/1937) and the corresponding national legislation enacted by member states to implement said Directive.

4. Authorized Access to Processed Personal Data

Access to personal data contained within a whistleblowing report is stringently limited to authorized personnel, including:

- 1) Designated members of Partsnord Europe AB's Whistleblowing Investigation Team.
- 2) The relevant Ethics and Compliance oversight body (or its equivalent) within Partsnord Europe AB.
- 3) Authorized Human Resources representatives and managerial staff directly involved in addressing or resolving any disciplinary actions or remedial measures that may arise subsequent to the conclusion of an investigation.

The individual(s) subject to allegations within a report will be duly informed of the existence and nature of the report (excluding the identity of the reporter, where anonymity is maintained or legally protected) to ensure their right to respond to the allegations. Should immediate notification risk compromising the integrity or efficacy of the investigation, such notification will be deferred until such a time that it no longer poses said risk.

Partsnord Europe AB may engage a third-party service provider to function as a "Data Processor" for the administration of its Whistleblowing Hotline. In such instances, the engaged Data Processor (e.g., Navex Global or a similar entity) will operate exclusively under the explicit instructions of Partsnord Europe AB. A formal written agreement will be executed with any such Data Processor, stipulating comprehensive technical and organizational measures for the protection of personal data. Details of any subcontractors utilized by the Data Processor will be made available by the provider. (*Internal Note: Partsnord Europe AB is responsible for verifying and specifying its service provider details and ensuring appropriate contractual safeguards are in place*). All transfers of personal data will be conducted in strict adherence to written agreements incorporating provisions for the lawful and adequate protection of such data.

Furthermore, personal data may be disclosed to competent law enforcement authorities should a determination be made that the matter warrants external reporting.

5. Data Retention Period

Personal data determined to be manifestly irrelevant to the investigation of a report will be promptly deleted or irreversibly anonymized upon initial processing of the report. All personal data pertaining to a closed matter will be securely deleted or anonymized within a period of two (2) years from the formal closure of said matter.

6. Your Rights as a Data Subject

Individuals whose personal data are processed possess the following rights:

- 1) **Right to Rectification:** Should your personal data be inaccurate or incomplete, you may request its correction or updating by contacting Partsnord Europe AB's Data Protection Officer (DPO).
- 2) **Right to Erasure and Restriction of Processing:** You may contact the DPO to request the cessation of processing of your personal data, the restriction of its processing, or its complete erasure, subject to applicable legal limitations.
- 3) **Right of Access:** You are entitled to request and receive a copy of your personal data held by Partsnord Europe AB, along with information regarding the processing of said data. Such data will be provided in a commonly used electronic format.

You also possess the right to lodge a complaint with the relevant supervisory data protection authority in your jurisdiction concerning Partsnord Europe AB's processing of your personal data.

7. Contact Information for the Data Controller and Exercising Your Rights

For any inquiries regarding the processing of your personal data, or to exercise any of the rights enumerated above, please direct your communication to the Data Protection Officer.

Data Controller: Partsnord Europe AB, Torshamnsgatan 27, SE-164 40 Kista, Sweden

Data Protection Officer (DPO): dpo@partsnord.com