

<b>1</b> <b>Filing system</b>	<b>Whistleblower Channel &amp; subsequent investigations</b>
	Patria Plc Arkadiankatu 2 FI-00100 Helsinki, Finland Other contact information info@patriagroup.com
<b>3</b> <b>Data protection officer / contact person in matters relating to the filing system</b>	Azahara González Compliance Manager for Internal Controls Address Hatanpään Valtatie 30 FI-33100 Tampere, FINLAND Other contact information security@patriagroup.com
<b>4</b> <b>Purpose of processing personal data, legal basis for processing and information on the source of the personal data</b>	<p>The purposes are:</p> <ul style="list-style-type: none"> <li>• <b>Detecting and preventing wrongdoing.</b> Personal data is processed to investigate reports of misconduct such as fraud, corruption, harassment or other breached of law, internal policies or security.</li> <li>• Protection whistleblowers including secure and anonymous <b>reporting channels</b>.</li> <li>• <b>Ensuring fair investigation.</b> It includes verifying facts and maintaining records of the process.</li> </ul> <p><b>Purposes for processing personal data, legal basis for processing and data collection:</b></p> <p><b>Purpose of process:</b> to ensure that reports concerning misconduct, unethical behaviour, or legal violations are managed with confidentiality, in compliance with applicable laws, and with operational effectiveness. Furthermore, the process aims to conduct investigations in a fair and impartial manner, escalating findings to relevant authorities or internal governance bodies when appropriate. It also includes maintaining comprehensive records to support audit requirements, legal defense, and regulatory reporting obligations.</p> <p><b>Legal basis:</b></p> <ul style="list-style-type: none"> <li>- <b>Legal obligation:</b> EU Whistleblowing Directive (2019/1937/UE) national implementations.</li> <li>- <b>Legitimate interest:</b> by enabling the confidential reporting of misconduct, the organization can proactively identify and address potential risks, prevent harm, and protect its employees, stakeholders, and reputation. This process supports internal governance, strengthens accountability, and contributes to a culture of integrity.</li> </ul> <p><b>Data collected from:</b> the data subjects or reporters.</p>
<b>5</b>	The following personal data is collected for this filing system:

<b>Description of the categories of data subjects and categories of personal data</b>	<p><b>The data subjects are</b> Controller's employees and EXT (subcontractors), reporters, persons who are subject to a report, users.</p> <p><b>The following information is stored about the data subjects:</b> The whistleblower channel has a 'free form' reporting format, so it is possible that no personal data is included by a reporter. However, the following personal data could be processed: name, address, gender, function title, nationality, administration or employee numbers, phone number, email address, characteristics of the incident (it might include: racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union memberships, data concerning health, sex life or sexual orientation), measures taken, investigation reports, other data relating to the incident, report credentials, sound file, IP address, and other technical data.</p>
<b>6 Legitimate interests of the controller or a third party</b>	<p>The organization has a legitimate interest in detecting and investigating potential misconduct that might otherwise remain undiscovered, thereby safeguarding its ethical standards, legal compliance, and operational integrity. While whistleblowing processes are mandated by law, relying on the data subject's consent is not appropriate in this context, particularly when the reporters are employees. Due to the inherent imbalance in the employer-employee relationship, employees may not be in a position to freely give, refuse, or withdraw consent without concern for potential repercussions. Therefore, the processing of personal data within the whistleblower framework is primarily based on the organization's legal obligation and its legitimate interest in thoroughly investigating reported concerns and taking appropriate remedial or disciplinary actions.</p> <p>Balancing test has been conducted.</p>
<b>7 Recipients and disclosure of personal data</b>	<p>As a broad interpretation of Article 4(9) of the GDPR, the parties (processors/recipients of personal data) to which Patria as a controller transfers personal data for processing (for example, in the context of performing maintenance tasks via a technical interface) are listed below.</p> <p>Access to the personal data in this filing system will be granted to the system supplier (private-sector system supplier(s)) as necessary for investigating any technical hardware or software failure.</p> <p>In addition, personal data in the filing system can be disclosed as necessary:</p> <ol style="list-style-type: none"> <li>1) for executing orders issued by the authorities, to the authority requesting the data;</li> <li>2) to the suppliers of information systems, tools and equipment required for various tasks and to the suppliers in charge of identity and access management;</li> <li>3) to suppliers investigating security incidents or nonconformities;</li> <li>4) with consent of the registered person to supplier of employee health services</li> <li>5) to attorneys and law firms providing legal services;</li> <li>6) courts.</li> </ol>
<b>8 Transfer of personal data to a third country or an international organisation</b>	<p>Not applicable.</p>

<b>9</b> <b>Data retention period</b>	<p>The five-year retention period has been established to ensure sufficient time for the completion of investigations and to preserve relevant information for potential legal proceedings, including court cases or future claims related to the reported incidents. This duration supports compliance with regulatory requirements and facilitates the organization's ability to respond effectively to any subsequent inquiries or actions.</p>																					
<b>10</b> <b>Principles of data protection; description of technical and organisational security measures</b>	<p>Personal data will remain confidential. Patria Plc's data network or server environment or the cloud services in which the filing systems are located are protected by the necessary technical and organisational measures.</p> <p>Organizational security measures are applied by way of limiting access to data to those persons working for data controller's organization who have a role-based need and purpose to process the data.</p>																					
<b>11</b> <b>Rights of the data subject</b>	<p>Data subjects have right of access to any personal data stored on them in the filing systems. According to the GDPR, the controller must reply to the data subject's request to exercise their rights within one month of receipt of the request.</p> <p>All requests should be sent in writing to one of the following Patria offices. The data subject must prove their identity when requesting access or rectification.</p> <table><tr><th>Country</th><th>Patria premises</th><th>Opening hours</th></tr><tr><td>Belgium</td><td>Rue du Fond des Fourches 23, 4041 Herstal</td><td>Requires appointment – contact security@patriagroup.com</td></tr><tr><td>Finland</td><td>Arkadiankatu 2, Helsinki Autotehtaanatie 6, Hämeenlinna Hatanpään valtatie 30, Tampere Lentokonetehtaanatie 1, Halli</td><td>Mon–Fri at 8-16  Requires appointment – contact security@patriagroup.com</td></tr><tr><td>Germany</td><td>Brunnenweg 4, 48465 Quendorf</td><td>Requires appointment – contact security@patriagroup.com</td></tr><tr><td>Latvia</td><td>Dunties 23A, 1005 Riga</td><td>Requires appointment – contact security@patriagroup.com</td></tr><tr><td>Sweden</td><td>Helikoptervägen 1, Stockholm Arlanda</td><td>Requires appointment – contact security@patriagroup.com</td></tr><tr><td>The Netherlands</td><td>Aalsbergen, 2 6942 SE Didam</td><td>Requires appointment – contact security@patriagroup.com</td></tr></table> <p><b>A. Right of access to personal data</b></p>	Country	Patria premises	Opening hours	Belgium	Rue du Fond des Fourches 23, 4041 Herstal	Requires appointment – contact security@patriagroup.com	Finland	Arkadiankatu 2, Helsinki Autotehtaanatie 6, Hämeenlinna Hatanpään valtatie 30, Tampere Lentokonetehtaanatie 1, Halli	Mon–Fri at 8-16  Requires appointment – contact security@patriagroup.com	Germany	Brunnenweg 4, 48465 Quendorf	Requires appointment – contact security@patriagroup.com	Latvia	Dunties 23A, 1005 Riga	Requires appointment – contact security@patriagroup.com	Sweden	Helikoptervägen 1, Stockholm Arlanda	Requires appointment – contact security@patriagroup.com	The Netherlands	Aalsbergen, 2 6942 SE Didam	Requires appointment – contact security@patriagroup.com
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	<p>Data subjects have right of access to any personal data stored on them in Patria's personal data filing system.</p> <p><b>B. Right to rectification and restriction of processing</b></p> <p>Data subjects have the right to require the controller to rectify inaccurate and incorrect personal data concerning them.</p> <p>Data subjects have the right to restrict processing by Patria as the controller of this filing system where one of the following applies:</p> <ul style="list-style-type: none"> <li>- the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;</li> <li>- the processing is unlawful, and the data subject opposes the erasure of the personal data and requests the restriction of its use instead;</li> <li>- the controller no longer needs the personal data for the purposes of the processing, but it is required by the data subject for the establishment, exercise or defence of legal claims;</li> <li>- the data subject has objected to processing pursuant to Article 21(1) pending the verification whether the legitimate grounds of the controller override those of the data subject.</li> </ul> <p>The request to rectify or restrict the processing of personal data in Patria's filing system should be sent in writing to one of the following Patria offices: Helsinki, Hämeenlinna, Tampere, Halli. The data subject must prove their identity when making the request for rectification or restriction.</p> <p><b>C. Right to erasure</b></p> <p>Data subjects have the right to have the personal data concerning them erased from filing system without undue delay where one of the following grounds applies:</p> <ul style="list-style-type: none"> <li>- the personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed;</li> <li>- the data subject withdraws consent on which the processing is based and there is no other legal ground for the processing;</li> <li>- the data subject objects to the processing pursuant to Article 21(1) and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2);</li> <li>- the personal data has been unlawfully processed;</li> <li>- the personal data has to be erased to comply with a legal obligation in European Union or national law.</li> </ul>
<p><b>12</b> <b>Right to object</b></p>	<p>According to Article 21 of the GDPR, data subjects have the right to object, on grounds relating to their particular situation, to the processing of personal data concerning them which is based on Article 6(1)(e) (processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller), including profiling based on those provisions. The controller may no longer process the personal data unless the controller</p>

	demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.														
<b>13</b> <b>Data portability</b>	<p>Once the data subject has provided Patria with the personal data concerning them in a structured, commonly used and machine-readable format, they have the right to have that data transmitted to another controller when:</p> <ul style="list-style-type: none"> <li>a) the processing is based on the data subject's consent or on a contract between the controller and data subject; and</li> <li>b) the processing is carried out by automated means; and</li> <li>c) the transfer is technically feasible.</li> </ul>														
<b>14</b> <b>Right to withdraw consent</b>	Not applicable.														
<b>15</b> <b>Right to complain to the supervisory authority</b>	<p>Data subjects have the right to lodge a complaint with a supervisory authority if they consider that the processing of personal data concerning them infringes the applicable data protection regulations.</p> <table border="1"> <thead> <tr> <th>Country</th><th>Contact info</th></tr> </thead> <tbody> <tr> <td>Finland</td><td>The Office of the Data Protection Ombudsman Lintulahdenkuja 4, 00530 Helsinki, Finland Postal address: P.O. Box 800, 00531 Helsinki, Finland Phone number: + 358 29 566 6700 Email: tietosuoja@om.fi</td></tr> <tr> <td>Sweden</td><td>Integritetsskyddsmyndigheten Postal address Box 8114, 104 20 Stockholm, Sweden Phone number: +46 (0)8 657 61 00 Email: imy@imy.se</td></tr> <tr> <td>Belgium</td><td>Autorité de protection des données Website: <a href="https://www.autoriteprotectiondonnees.be/citoyen">https://www.autoriteprotectiondonnees.be/citoyen</a> Phone number: +32 (0)2 274 48 00 Email: contact@apd-gba.be</td></tr> <tr> <td>Latvia</td><td>Data Sate Inspectorate Republic of Latvia Elijas 17, Riga, Latvia Website: <a href="https://www.dvi.gov.lv/en">https://www.dvi.gov.lv/en</a> Email: pasts@dvi.gov.lv</td></tr> <tr> <td>The Netherlands</td><td>Autoriteit Persoonsgegevens Hoge Nieuwstraat 8, 2514 EL The Hague, The Netherlands Website: <a href="https://autoriteitpersoonsgegevens.nl">https://autoriteitpersoonsgegevens.nl</a> Phone number: +31 88 1805 250</td></tr> <tr> <td>Germany</td><td>Die Bundesbeauftragte für den Datenschutz und die Informationsfreiheit (BfDI) Husarenstraße 30, 53117 Bonn, Germany Website: <a href="http://www.bfdi.bund.de">www.bfdi.bund.de</a> Phone number: +49 (0)228-997799-0 Email: poststelle@bfdi.bund.de</td></tr> </tbody> </table>	Country	Contact info	Finland	The Office of the Data Protection Ombudsman Lintulahdenkuja 4, 00530 Helsinki, Finland Postal address: P.O. Box 800, 00531 Helsinki, Finland Phone number: + 358 29 566 6700 Email: tietosuoja@om.fi	Sweden	Integritetsskyddsmyndigheten Postal address Box 8114, 104 20 Stockholm, Sweden Phone number: +46 (0)8 657 61 00 Email: imy@imy.se	Belgium	Autorité de protection des données Website: <a href="https://www.autoriteprotectiondonnees.be/citoyen">https://www.autoriteprotectiondonnees.be/citoyen</a> Phone number: +32 (0)2 274 48 00 Email: contact@apd-gba.be	Latvia	Data Sate Inspectorate Republic of Latvia Elijas 17, Riga, Latvia Website: <a href="https://www.dvi.gov.lv/en">https://www.dvi.gov.lv/en</a> Email: pasts@dvi.gov.lv	The Netherlands	Autoriteit Persoonsgegevens Hoge Nieuwstraat 8, 2514 EL The Hague, The Netherlands Website: <a href="https://autoriteitpersoonsgegevens.nl">https://autoriteitpersoonsgegevens.nl</a> Phone number: +31 88 1805 250	Germany	Die Bundesbeauftragte für den Datenschutz und die Informationsfreiheit (BfDI) Husarenstraße 30, 53117 Bonn, Germany Website: <a href="http://www.bfdi.bund.de">www.bfdi.bund.de</a> Phone number: +49 (0)228-997799-0 Email: poststelle@bfdi.bund.de
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**7.8.2025**

<b>16</b> <b>Automated decision-making and profiling</b>	The personal data in the filing system will not be used for automated decision-making or profiling.
<b>17</b> <b>Additional information</b>	We reserve the right to update this Privacy Notice.
<b>18</b> <b>Updates</b>	The document was last updated on 7.8.2025
<b>19</b> <b>Appendices</b>	Balancing test. DPIA.