

Privacy statement for our whistleblowing channel

Suomen Malmijalostus Oy and its wholly owned subsidiaries ("Suomen Malmijalostus") process personal data reliably, securely, and transparently. In this document, we describe the processing of personal data in relation to reports made through our whistleblowing channel and any investigations or processes that may arise from them.

1. Data controller

Suomen Malmijalostus Oy, business ID: 2674050-9
Keskuskatu 5 B, 00100 Helsinki

If you need more information about the processing of your personal data or your rights as a data subject, you can contact us via our reporting channel.

2. Purposes and legal basis for processing

Personal data may be collected and processed for the following purposes:

- + Processing of notifications submitted through the reporting channel, including investigations and reporting
- + Monitoring and ensuring compliance with legislation and internal regulations of Suomen Malmijalostus
- + Preventing, investigating, and prosecution of crimes and other misconduct
- + Safeguarding of legal rights
- + Fulfilling legal obligations

The legal basis for processing personal data is the fulfillment of legal obligations and the legitimate interests of the data controller.

3. Personal data processed

In the context of notifications made through the reporting channel, the following types of personal data, typically related to the reporter or the subject of the notification, may be processed if provided:

- + Identifying information, such as name; the reporting channel allows for anonymous reporting
- + Contact details, such as address, phone number, and email
- + Employer information
- + Information related to the notified event, suspected crime or misconduct
- + Other information and materials provided by the reporter

4. Retention periods

We will retain your personal data as long as necessary to fulfill the purposes defined in this privacy statement, unless legislation requires a longer retention period.

5. Regular sources of data

We primarily receive personal data from the reporter. The whistleblowing channel is aimed at the personnel of Suomen Malmijalostus and our partner companies.

Additionally, personal data may be collected from Suomen Malmijalostus' internal systems, relevant parties related to the notification, and from the authorities.

6. Disclosure of personal data

At the discretion of Suomen Malmijalostus, personal data may be disclosed within the framework of applicable legislation.

Personal data may be disclosed at the request of authorities and as required by law, as well as to protect the rights of Suomen Malmijalostus.

7. Data transfers

We process your personal data within the European Economic Area (EEA), where our servers are located.

8. Security of processing and automated decision-making

When processing personal data, we ensure the proper security and privacy of the data, including protection against unauthorized processing and loss.

Electronic processing of personal data is secured by firewalls, passwords, and other generally accepted methods in the field of data security. Processing of personal data is carried out under confidentiality and only by designated personnel of Suomen Malmijalostus and the Greenstep reporting channel service provider.

Automated decision-making or profiling is not used in the processing of personal data.

9. Rights of the data subject

As a data subject, you have the right to:

- + Request access to your personal data
- + Request rectification, deletion, or restriction of processing of your data
- + Object to the processing
- + Request the transfer of your data from one system to another
- + Withdraw your consent if the processing is based on your consent

You can exercise your rights under data protection legislation by contacting us informally through the reporting channel.

You have the right to lodge a complaint with the Data Protection Ombudsman if you believe that your personal data is not being processed lawfully.

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