



PRIVACY STATEMENT FOR GOFORE'S WHISTLEBLOWING CHANNEL

For us, data protection and responsible business conduct are of the utmost importance. At Gofore, data protection is viewed as constituting a part of all business operations. Personal data are processed and protected in accordance with the applicable regulations and laws.

In this privacy statement, we explain the principles and procedures, compliance with which we ensure when collecting and processing the personal data of the person who has submitted a whistleblowing report and the personal data of the individual that the whistleblowing report pertains to, as well as when processing the whistleblowing report.

Name of the register

Whistleblowing channel

Controller

Joint controllership of Gofore Plc, Gofore Lead Oy, Gofore Verify Oy, Gofore Drive Oy, CCEA Oy, Rebase Consulting Oy, Sleek Oy, Gofore Estonia OÜ, Gofore Spain SL, Gofore Germany GmbH, eMundo GmbH and eMundo GmbH Austria (jointly, "Gofore").

Gofore Plc (Business ID 1710128-9, Kalevantie 2, 33100 Tampere)

Gofore Lead Oy (Business ID 1906590-4, Urho Kekkosen katu 7 B 00100 Helsinki)

Gofore Verify Oy (Business ID 2384333-4, Urho Kekkosen katu 7 B 00100 Helsinki)

Gofore Drive Oy (Business ID 2616184-9, Vapaaherrantie 2, 40100 Jyväskylä)

CCEA Oy (Business ID 2161491-7, Keilaranta 1, 02150 Espoo)

Rebase Consulting Oy (Business ID 3125035-2, Lönnrotinkatu 5, 00120 Helsinki)

Sleek Oy (Business ID 3266908-3, Kalevantie 2, 33100 Tampere)

Gofore Estonia OÜ (Registration number 14628239, Maakri 19/1, 10145, Tallinn, Estonia)

Gofore Spain SL (Registration number B87954749, entro de Empresas UPM Parque Científico y Tecnológico UPM Campus de Montegancedo s/n 28223 Pozuelo de Alarcón, Madrid, Spain)

Gofore Germany GmbH (Registration number HRB 238568, Balanstraße 71a, 81541, Munich, Germany)

eMundo GmbH Germany (Registration number HRB 130424, Hofmannstrasse 25-27, Munich, Bavaria 81379, Germany)

eMundo GmbH Austria (Registration number FN 427301i, Innsbrucker Bundesstraße 71, 5020 Salzburg, Austria)

Contacts in data protection matters

Regardless of who the controller in each case is, data subjects can send inquiries and requests regarding data protection to privacy@gofore.com.

Purpose and legal basis of personal data processing

We collect and process personal data only to the extent that it is necessary for meeting the obligations of the whistleblowing process and the related legislation.

The legal basis for the processing is the controller's statutory obligation to maintain a whistleblowing channel (in Finland, the Act on the Protection of Persons Reporting Breaches of European Union and National Law (1171/2022) and in Estonia, Spain, Germany and Austria, the corresponding national law).

Personal data we collect

As a rule, the personal data processed is collected from the person submitting the report. Additionally, in connection with the investigation of any suspected misconduct, personal data may be collected from Gofore's systems and from third parties.

Gofore only collects personal data that is necessary for the purposes of investigating suspected misconduct, such as:

- Information provided by the whistleblower about themselves, such as contact details (it is possible to submit the report anonymously, in which case the data of the whistleblower is not collected)
- Identification information provided by the whistleblower concerning the person the report pertains to, such as their name and position in the company (the information depending largely on the nature of the report)
- In connection with investigating the case, information about the person the report pertains to and the events reported upon, as obtained from the whistleblower, Gofore's systems and third parties

The reports may also contain sensitive information. Such information may relate, for instance, to criminal convictions, suspected criminal offences, state of health, political opinions, racial or ethnic origin, and may include information of so-called vulnerable data subjects.

We do not collect personal data for any other purposes.

Personal data retention periods

Gofore will delete the data received through the reporting channels five years after receiving the report, unless their retention is necessary for the exercise of rights or obligations stipulated in the legislation or for the establishment, exercise or defense of legal claims. Gofore will delete personal data that is clearly not relevant to the processing of the report without any undue delay.

Disclosure and transfer of data

The data is processed by a limited number of processors.

In the processing of the data we collect, we may retain subcontractors or service providers, who have the right to process your data strictly in the scope required by the agreed services.

Data will only be disclosed outside of Gofore to the extent permitted and required by law (e.g., to the police or other competent authorities if the investigation of the incident requires action by the authorities).

Your personal data will not be transferred outside the European Union or the European Economic Area.

Your rights

Gofore arranges for the appropriate implementation of your rights in relation to the processing of your personal data. You have the right to:

- Gain access to your personal data. You may request Gofore to confirm whether we are processing your personal data and a copy of any of your personal data by sending a request to the address mentioned above in this statement. This right may be limited in accordance with the applicable law. In case your right of access is restricted under applicable law, you have the right to be informed of the reasons for the restriction and to request for the data to be provided to the Data Protection Ombudsman in accordance with said law;
- Right to rectification and/or erasure. You have the right to ask us to rectify any erroneous or inaccurate personal data concerning you, and you also have the right to ask us to delete personal data concerning you, but the exercise of this right is subject to regulatory restrictions. You can exercise these rights by sending a request to the address mentioned above in this statement;
- The right to be informed of the essential elements of the arrangement between joint controllers. The controllers have entered into an agreement between the joint controllers. You can exercise your rights by sending a request to the address mentioned above in this statement;
- The right to lodge a complaint with a supervisory authority. If you wish to lodge a complaint about how we process your personal data, the EU General Data Protection Regulation confers upon you the right to lodge a complaint with a supervisory authority in the Member State where you have your habitual residence or place of work or where the alleged breach of the GDPR has occurred. In Finland, the competent supervisory authority is the Data Protection Ombudsman (see www.tietosuoja.fi).

The processing of personal data does not involve any automated decision-making or profiling.

Protection of personal data

At Gofore, data security and the protection of personal data are organized in accordance with industry practices in such a way that personal data is protected from unauthorized access and

processing, as well as from unlawful and inadvertent destruction, loss and corruption. In addition, practices for protecting data are constantly being developed. Information security and the related risk management are based on the management system and the information security policy specifying same. The information security policy follows the structure of the ISO27002 (2013) standard, where applicable.

Gofore ensures, contractually or with other appropriate safeguards, that the subcontractors and service providers we retain for the processing of personal data are committed to an adequate level of data protection.

Updating the privacy statement

We will update this privacy statement whenever there are changes in the processing of personal data or in applicable legislation, of which we must inform you.