

## Privacy notice for whistleblowing

### 1. INTRODUCTION

We, Södra, are the data controller for the processing of your personal data when you use or appear in a report within the framework of our whistleblower function.

For the purposes of this privacy notice, "**Södra**" includes Södra Skogsägarna ekonomisk förening (org. no. 729500-3789).

All references in this Privacy Notice to "**we**", "**us**" and "**our**" shall be deemed to constitute a reference to Södra. You can find our contact details at the end of this Privacy Notice.

We respect your privacy and are committed to protecting your personal data.

### 2. SCOPE OF THE PRIVACY NOTICE

This information is about how Södra processes the personal data of users of our whistleblower function and people who appear in it (for example, suspects or witnesses). Among other things, we tell you why we collect and use personal data, who we share your personal data with, and what rights you have in relation to your personal data.

### 3. WHAT CATEGORIES OF PERSONAL DATA DO WE PROCESS, FOR WHAT PURPOSE AND ON WHAT LEGAL BASIS?

Södra processes personal data in the manner and for the purposes described in the table below. The table also shows the legal basis on which we base our processing and for how long we will keep your personal data.

What we do and why:	The personal data we process:
<p>We will process your personal data when we handle reports of misconduct (including breaches of the law and actions that violate Södra's internal policies) received via the whistleblower function by:</p> <ul style="list-style-type: none"> <li>• Collect and document reports in the whistleblower function;</li> <li>• Communicate with the reporter, person(s) covered by the report (including suspects and witnesses to the reported breach);</li> <li>• Conduct investigations and follow up on the content of reports and any follow-up issues (including, if necessary, collecting information</li> </ul>	<ul style="list-style-type: none"> <li>• Contact information, such as name, telephone number, address and email address;</li> <li>• Date of birth;</li> <li>• Reporting history and reporting number;</li> <li>• Employee information (such as position and role of responsibility);</li> <li>• Images, audio and video recordings;</li> <li>• Personal data related to criminal convictions, suspected and/or actual offences, such as bribery or financial crime;</li> <li>• Personal data related to acts and omissions that violate our Code of Conduct, and,</li> <li>• User history from the IT equipment and digital systems that Södra controls (including internet and communication history).</li> </ul>

<p>from IT equipment that Södra controls);</p> <ul style="list-style-type: none"> <li>• Report violations to the relevant authorities.</li> </ul>	
<p><b>Legal basis:</b></p>	
<p><b>Legal obligation:</b> The processing of your personal data is required by the Whistleblower Act (Act 2021:890 on the Protection of Persons Who Report Misconduct). Our obligation to notify relevant authorities in certain cases follows, for example, from the Money Laundering Act (2018:2018) and the Work Environment Act (1977:1160). If the personal data is not processed, Södra's legal obligation cannot be fulfilled.</p> <p><u>Processing of sensitive personal data</u></p> <p>To the extent that the whistleblower case contains sensitive personal data (e.g. injuries or other health data), the processing is carried out on grounds of important public interest, on the basis of the Whistleblower Act and the EU Whistleblower Directive (in addition to the support set out above), and otherwise for the establishment, exercise or defence of legal claims.</p>	
<p><b>How we share and transfer your data:</b></p>	
<p>In order to fulfil the purposes set out above, Södra will share your personal data with the following recipients;</p> <ul style="list-style-type: none"> <li>• Relevant authorities (such as law enforcement authorities), if we are ordered by the authority concerned to disclose your personal data or if we proceed to report the breach;</li> <li>• Our external advisors (such as legal advisors), who assist us with the investigation of whistleblower reports;</li> <li>• People InTouch B.V. (SpeakUp), which is the provider of the IT solution for the whistleblowing function, if it is necessary for the provider to perform its services for us; and,</li> <li>• Other external professional advisors and service providers engaged by Södra to conduct the investigation in an appropriate manner (e.g. forensic analysis providers).</li> </ul> <p>Södra will transfer your personal data to a so-called third country (a country outside the EU/EEA) within the framework of this processing activity, in the event that a whistleblower report submitted to Södra's whistleblower channel is cross-border. A whistleblower report is cross-border if either the whistleblower or a person who appears in the report and/or investigation, e.g. as a witness, is employed by Södra in a country outside the EU/EEA. In these situations, Södra may need to share details, including your personal data, relating to the</p>	

matter with recipients in the following third countries: the United States, the United Kingdom and China.

You can read more in Section 6 below about the security measures we take to protect your personal data in the event of third-country transfers. You are also welcome to contact us via [info@sodra.com](mailto:info@sodra.com) if you have any questions regarding third-country transfers of your personal data.

**Storage period:**

We process your personal data during the storage period required by law, which is no longer than 2 years after the end of the case for which the whistleblower function has been used.

#### **4. ADDITIONAL PURPOSES**

Depending on the nature and severity of the case, a report received that is not deemed to constitute a whistleblower case under the law may still be handled further by Södra. This occurs when the processing is required under a legal obligation arising from labour law (for example the Discrimination Act and the Work Environment Act) or otherwise on the basis of Södra's legitimate interest in investigating personnel matters and managing conflicts in order to create a good working environment at Södra. This applies regardless of whether the misconduct is caused by Södra's employees, members, customers, suppliers or others.

Cases that are not whistleblower cases according to the Whistleblower Act are removed from the whistleblower function. Södra's internal recipients assess whether the case should be investigated or otherwise handled outside the framework of the whistleblower function. You can read more about our processing of personal data regarding personnel matters on Södra's intranet or by contacting us below.

In addition to the processing purposes set out above, it may be necessary for us to process personal data for additional purposes, including if we are ordered by a legal obligation to process personal data (including to disclose it) by a competent court or authority.

We may also process your personal data in order for you or the company you represent, ourselves or relevant third parties (such as an employee exposed to crime) to be able to establish, assert or defend legal claims, for example in the event of an ongoing or threatened dispute or criminal proceedings. We will generally process such personal data for ten (10) years from its creation or for the time necessary to fulfil the purpose in the case in question. This processing of your personal data is based on our legitimate interest in establishing, exercising and/or defending legal claims.

Södra's Audit Committee and Board of Directors regularly receive anonymised reports on ongoing whistleblower cases and measures taken in relation to such cases, based on Södra's legitimate interest in reviewing, managing risk and monitoring the effectiveness of the association's internal control system. The duty of confidentiality under the Whistleblower Act also applies in these cases.

We categorise whistleblower cases for the purpose of, and with the support of Södra's legitimate interest, to compile statistics. We do this through anonymised summaries of all whistleblower cases, such as calculating the total number of whistleblower cases broken down into different categories.

## 5. FROM WHERE DO WE OBTAIN YOUR PERSONAL DATA?

We process personal data that is obtained directly from you when you use the whistleblower function, or that is provided by another person within the framework of a report or investigation.

## 6. TRANSFER TO THIRD COUNTRIES

Where we transfer your personal data, as set out above in such cases, we are responsible for ensuring that the transfer is made in accordance with applicable data protection legislation before it takes place. Such safeguards may include ensuring that the country in which the recipient is located ensures an adequate level of data protection as determined by the European Commission, or ensuring appropriate safeguards based on the use of standard contractual clauses adopted by the European Commission and other appropriate measures to protect your rights and freedoms.

You can find a list of the countries that the European Commission has decided provide an adequate level of data protection [at this link](#).

You can find the European Commission's Standard Contractual Clauses [at this link](#). You can exercise your right to access the standard contractual clauses we apply by contacting us.

## 7. YOUR RIGHTS

Below is a summary of the rights you have under European data protection law. There is no cost to you to exercise these rights and you can exercise them by contacting us (see contact details at the end of this Privacy Notice). Please do not hesitate to contact us if you have any questions regarding your rights.

Please note that Södra will always make an assessment of a request to exercise a right to determine whether the request is justified. All rights listed below are not absolute and exclusions may apply.

- (a) **Right of access.** You are entitled to receive a copy of your personal data processed by Södra upon request and to receive supplementary information regarding Södra's processing of your personal data.
- (b) **Right to rectification.** You have the right to have your personal data corrected and/or completed if it is incorrect and/or incomplete.
- (c) **Right to erasure.** You have the right to request that Södra deletes your personal data without undue delay in the following situations.
  - the personal data is no longer necessary for the purposes for which it was collected or otherwise processed;

- you withdraw your consent to the processing and there is no other lawful basis for the processing;
  - you make a legitimate objection to the processing of your personal data;
  - the personal data has been unlawfully processed; or
  - Deletion is required to comply with a legal obligation.
- (d) **Right to restriction of processing.** You have the right to request the restriction of the processing of your personal data in the following situations:
- the accuracy of the personal data is under investigation;
  - the processing is unlawful or no longer necessary for the purposes of the processing, but you oppose the erasure of personal data and instead request restriction of processing;
  - Södra no longer needs the personal data, but you need the personal data to establish, exercise or defend legal claims; or
  - You have objected to the processing of your personal data and such objection is under investigation.
- (e) **General right to object.** You have a general right to object, at any time, to such processing of your personal data that is based on our legitimate interest. If you object, we must demonstrate that we have a compelling legitimate ground for such processing or that we need the personal data to establish, exercise or defend legal claims.

## 8. COMPLAINTS TO THE SUPERVISORY AUTHORITY

The data protection authority in Sweden is the **Swedish Authority for Privacy Protection**. If you believe that our processing is being carried out in violation of applicable data protection legislation, we encourage you to contact us in the first instance so that we can review your complaints. You can also lodge a complaint with the supervisory authority at any time.

## 9. CONTACT US

You can get in touch with us in the following ways:

**Södra Skogsägarna ekonomisk förening**

**Postal address:** Skogsuddevägen 40, 352 51 Växjö

**E-mail:** [info@sodra.com](mailto:info@sodra.com)