

# PRIVACY STATEMENT

|   |   |
|---|---|
| <b>Date:</b>  | Updated 1 December 2021   |
| <b>1. Data Controller:</b>                            | Realia Group Oy and Finnish group of companies  |
|   | Valimotie 17-19,<br>FI-00380 Helsinki   |
| <b>2. Contact person(s):</b>                          | Head of Legal Sonja Westerling<br>sonja.westerling@realia.fi<br><br>Legal Counsel Nina Åkerblom<br>nina.akerblom@realia.fi  |
| <b>3. Data Processor:</b>                             | Service provider of the Whistleblowing-reporting channel is WhistleB Ab.  |
| <b>4. Name of the register:</b>                       | Compliance register   |
| <b>5. Purpose and ground for the data processing:</b> | Legal obligation: according to the EU whistleblower directive and forthcoming national law by which the EU directive will be implemented, the company shall have internal reporting channel. Also money laundering legislation requires notifiables to have reporting channels. In addition to the legal obligation, contract and/or legitimate interest may supplement the legal obligation as justification for the data processing |
| <b>6. Information content of the register:</b>        | Data is received primarily from the reporters, who report of the noticed or suspected compliance misconducts or violations. Depending on the case, as needed and ,in the end, under discretion of each reporter, the report may include some personal data.   |
| <b>7. Sources of the data:</b>                        | Primary source of information is the reporter but during the investigation of the matter some information requests may be necessary to ask also from other persons.   |

## PRIVACY STATEMENT

|  |   |
|--|---|
| <p><b>8. Disclosure of the data:</b></p>                   | <p>Personal data is not disclosed outside Realia group of companies, unless it is considered necessary from the investigation process point of view or in order to conduct some corrective actions.</p>   |
| <p><b>9. Data protection principles:</b></p>               | <p>9.1. Manual register:<br/>Personal data which is stored in paper form is kept in locked premises and access to the information is limited only to them who need to have access to the information.</p> <p>9.2. Electronic register:<br/>Only Compliance team has access to the reporting channel. Access is behind password. However, personal data may be processed also in other systems and by other persons when that is justified. Information security will always be guaranteed</p> |
| <p><b>10. Retention periods:</b></p>                       | <p>Personal data will be stored in the channel as long as the matter is open and also after that as long as there is justified reason for storage. Personal data will be erased as soon as there is no longer need to store it.<br/>In compliance team´s annual summaries and records the personal data will be deleted so that no individuals can be identified.</p>   |
| <p><b>11. Inspection right of the data subjects:</b></p>   | <p>Data subjects have right to review what personal data the company has collected and stored about them and check that such data is correct. Review requests are asked to be made in writing (by signed letter or e-mail). If you have any questions, please contact us by sending an e-mail to tietosuoja@realia.fi.</p>  |
| <p><b>12. Right to require correction of the data:</b></p> | <p>Realia will independently and without undue delay make necessary actions based on received rectification, deletion or other requests.</p> <p>In case of any questions, please contact us by e-mail to tietosuoja@realia.fi.</p>  |
| <p><b>13. Other rights of the data subject:</b></p>        | <p>Other rights of the data subject are the right to request information about him/her removal or restriction of processing, the right to oppose himself/herself, the right to lodge a complaint with the supervisory authority, and the right to be informed of the breach of his/her personal data.</p>   |