

## **Information on the processing of personal data for the data subject: Climate Fund's whistleblowing channel**

### **1. Controller**

Name: Ilmastorahasto Oy (Climate Fund)  
Business ID: 2777483-1  
Address: Porkkalankatu 1  
Postal code: 00180  
City: Helsinki  
Telephone number: +358 401527570  
Email address: info@ilmastorahasto.fi

### **2. Data Protection**

**Officer** As the controller  
Address: privacy@ilmastorahasto.fi  
Email:

### **3. Purpose of processing**

The personal data is used for processing whistleblowing reports, i.e. reports about the unlawful or otherwise inappropriate activities of the Climate Fund or one of its representatives, and taking measures deemed necessary due to the processing. By processing the data contained in whistleblowing reports, the Climate Fund seeks to do what is right and responsible.

### **4. Basis of processing**

The Climate Fund processes the personal data on the following bases:

- Compliance with a legal obligation.
- The Climate Fund's legitimate interest, in this case promoting the lawfulness and responsibility of the Climate Fund's operations.

### **5. Data processed**

The report can be made anonymously, and the whistleblowing channel used by the Climate Fund does not collect data such as names or IP addresses. If a report includes personal data, that data will nevertheless come to the knowledge of those processing the report at the Climate Fund. The categories of personal data processed thus depend on what data is provided in the report and what information is uncovered by the internal investigation of the report and can include, e.g. the name, position and information about the activities of the alleged wrongdoer.

### **6. Regular sources of data**

The aforementioned personal data are obtained from those making whistleblowing reports and through the investigation of the reports. Making a whistleblowing report is not mandatory, and the reporter is not required to provide any personal data. However, the efficient processing of reports may require the collection of sufficient data.

### **7. Data storage period**

The personal data will be erased when the whistleblowing process is concluded or after the statutory storage period.

### **8. Disclosures of data**

At the Climate Fund, the data can be processed by the appointed processors of whistleblowing reports. Personal data will not be disclosed outside the Climate Fund without a lawful basis. If necessary, data can be disclosed to, e.g., the authorities in order to report a crime.

**8. Transfers of data outside the EU or EEA or to international organisations** Whistleblowing reports are processed in the WhistleB service used by the Climate Fund. The service stores its data within the EU.

### **9. Protection of personal data**

The Climate Fund employs appropriate technological and organisational safeguards to ensure the secure processing of personal data. Whistleblowing reports are processed in the WhistleB service used by the Climate Fund in accordance with the whistleblowing process defined by the Climate Fund. The storage of electronically processed data is secured with technological safeguards. The WhistleB service has been issued a data security certificate for its high level of security. Only the designated persons in the Climate

Fund have access to the service. Access to data requires authentication with a username and password. Climate Fund personnel have a secrecy obligation.

## 10. Automated decision-making

The Climate Fund does not use the aforementioned personal data for automated decision-making (such as profiling) that would have a significant impact or legal effects on data subjects.

## 11. Rights of the data subject

You have certain rights if the Climate Fund is processing your personal data.

- You have the right to know whether the Climate Fund is processing personal data that concern you. If the Climate Fund is processing personal data that concern you, you have the right to obtain a copy of such data unless the Climate Fund has a lawful basis for refusing your request.
- You have the right to know for which purposes and in what way the Climate Fund is processing your personal data. This information is provided in this document. If you have any questions, you may contact the Climate Fund's Data Protection Officer. The DPOs contact details can be found in section 2.
- If your personal data being processed by the Climate Fund is inaccurate, you can ask the Climate Fund to rectify the data. If the Climate Fund rectifies data on the basis of your request, the Climate Fund has an obligation to notify all parties to whom it has previously disclosed the data of the rectification where possible. You can also have incomplete personal data completed by submitting additional information to the Climate Fund.
- If you consider that the Climate Fund is processing inaccurate personal data concerning you or the data is being processed unlawfully, or if you have objected to the processing of your personal data on a specific basis, you can request that the Climate Fund restrict the processing of your personal data. In such cases, the Climate Fund will only have the right to process your data based on your consent or if the data is necessary for the establishment, exercise or defence of legal claims, for reasons of public interest or in order to protect the rights of another. If the Climate Fund restricts the processing of data on the basis of your request, the Climate Fund has an obligation to notify all parties to whom it has previously disclosed the data of the restriction where possible.
- In some cases, you have the right to request the erasure of your personal data. However, the Climate Fund may not be required to erase your data, for example if the processing is necessary for complying with a statutory obligation or for the establishment, exercise or defence of legal claims. If the Climate Fund erases your data on the basis of your request, the Climate Fund has an obligation to notify all parties to whom it has previously disclosed the data of the erasure where possible. With certain exceptions, you have the right to request the erasure of your data in the following situations:
  - o The personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed.
  - o The processing of personal data is based solely on your consent, which you have withdrawn.
  - o The Climate Fund is processing your personal data unlawfully or the data have to be erased for compliance with a legal obligation to which the Climate Fund is subject.
  - o You object to the processing of your personal data for direct marketing purposes.
  - o You object to the processing of your personal data and there are no overriding legitimate grounds for the processing.
- You have the right to object to the processing of your personal data by the Climate Fund on certain bases. You can do so at any time on grounds relating to your particular situation. In such cases, the Climate Fund may no longer process your personal data unless there are compelling legitimate grounds for the processing which override your interests, rights and freedoms, or for the establishment, exercise or defence of legal claims. You have the right to object at any time to the processing of your personal data for direct marketing purposes.
- You have the right to lodge a complaint with the competent supervisory authority, i.e. the Data Protection Ombudsman, if you consider that the Climate Fund is processing your personal data in violation of data protection regulations.