

# Juuriharja Whistleblowing Service Platform Privacy Policy

Juuriharja Consulting Group Oy (“Juuriharja” or “we”) provides a whistleblowing service platform (“Service”) to its commercial customers. Via the Service, a company (hereinafter “Company”) creates a whistleblowing channel for itself. Juuriharja has agreed with the Company additional terms in the agreement we have with the Company (hereinafter “Agreement”) that will also apply to your use of the Service, the whistleblowing channel and our processing of your personal data.

Under the EU Data Protection Regulation (2016/679) that will apply to our processing of your personal data the Company shall be regarded as data controller and Juuriharja shall be regarded as data processor processing your personal data based on agreement with and instructions from the Company.

Our Privacy Policy is designed to assist you in understanding how we collect, use, and disclose personal information we receive from you through the Service on behalf of the Company. If you have any questions relating to our processing of your personal information that are not answered by this privacy policy you should primarily turn to the Company as the data controller. Their contact details will be found from the whistleblowing channel.

This Privacy Policy may be updated from time to time to reflect changes in the Service, laws and regulations and to reflect descriptions of changes in key functionality for the Services. The Company will be advised of these updates in accordance with the Agreement and their approval may be required before such updates take effect on you. We will post any changes via the Service or otherwise provide you with notice of any such changes. You are advised to consult this Privacy Policy regularly for any changes.

## Processing of Personal Information

Juuriharja collects personal information in order to be able to provide the Service, such as name, email address and telephone number of Company admin users.

The Service is configured in such a way that allows the whistleblowers to report wrongdoing anonymously. Unless you decide to identify yourself and provide your personal information you can act anonymously within the Service.

Whistleblowers may report issues in a way that contains personal information. In such situations the Company informs the data subjects of the report so that they know that their personal information is being processed. Individual reports will be erased from our Service within 90 days from when the case has been given the status “closed” by Company.

Juuriharja is only processing such information as agreed with the Company and we are not responsible for monitoring or policing the personal information whistleblowers choose to disclose on the Company whistleblowing channel.

We store your personal information according to the applicable laws and only as long as required for the purposes described the Agreement. When the purposes no longer exist we will erase your data.

## Third-Party Service Providers

We may employ contractors and third-party companies to operate the Service and perform related services which allow to perform our obligations under the Agreement. These third parties may have access to your personal information and other information collected as set forth above but only to perform these tasks on our behalf and they are obligated not to disclose your personal information or use it for any other purpose.

Our current contractor is Gofore Oyj (1710128-9).

## Security

We take security very seriously. Juuriharja uses commercially reasonable and industry standard safeguards to preserve the integrity and security of your personal information. We restrict access to personal information to those employees, contractors, and agents who need to know that information in order to process it for us, and who are subject to confidentiality obligations.

## International Transfer

Your information may be transferred to, and maintained on, computers located outside of your country. Currently, we do not transfer your personal information outside the European Economic Area. All transfers of personal information shall comply with the Agreement and applicable data protection laws.

## Your rights under the data protection legislation

You have the right to inspect what information related to you has been stored in our personal data files. You have a right to have incomplete, incorrect, unnecessary or outdated personal data deleted or updated according to the applicable laws.

If you have any questions relating to our processing of your personal information that are not answered by this privacy policy you should primarily turn to the Company as the data controller. You can also contact us via e-mail and contact address specified below.

In addition to the rights described above you are entitled to make a complaint to the data protection authority, especially in the European Union country where you have your domicile or permanent work place or where the claimed breach of data protection regulation occurred. In Finland this authority is the [data protection ombudsman](#).

## Contact Us

If you have any questions or comments about this Privacy Policy, please contact us at:

Juuriharja Consulting Group Oy  
Data protection  
Runeberginkatu 6 I  
00260 Helsinki, Finland  
[info@juuriharja.fi](mailto:info@juuriharja.fi)

This privacy policy was last updated on April 24<sup>th</sup>, 2020.