

# PRIVACY NOTICE – Reporting channel

*Previous update: August 2023*

We at CapMan respect the privacy of all our stakeholders. Our privacy notices describe how we process personal data in accordance with the EU's General Data Protection Regulation ("**GDPR**").

CapMan Group employees, stakeholder representatives or private individuals ("**you**") can use the reporting channel to alert CapMan about illegal actions or unlawful misconducts affecting individuals, our company/organisation, the society or the environment, such as money laundering, market abuse, violations of data privacy, corruption, violations of CapMan's Code of Conduct or internal rules of process. This Privacy Notice describes how CapMan processes personal data collected through the reporting channel.



## 1. Contact details of the data controller

The controller of your personal data is CapMan Plc, CapMan AIFM Ltd or CapMan Wealth Services Ltd, as applicable. If you have questions regarding this Privacy Notice or wish to exercise your rights, you may contact:

CapMan Plc  
Privacy Matters  
Ludviginkatu 6, 00130 Helsinki  
Email [privacy@capman.com](mailto:privacy@capman.com)

## 2. What personal data do we collect and process?

We generally collect and process the following types of personal data:

- Name, email address and telephone number of the reporting person
- Data of the person who is subject to reporting, such as name, title and information on activities that are subject to reporting
- Other additional information provided by the reporting person

A report can also be made anonymously, in which case we do not process personal data of the reporting person.

We do not generally process personal data belonging to special categories of personal data (for example, data revealing ethnic origin, political opinions, religious or philosophical beliefs, trade union

membership, health, or sexual orientation) in the reporting process, nor do we encourage the inclusion of any special categories of personal data in the report. We process special categories of personal data or data related to criminal convictions and offences only when it is necessary for the investigation and resolution of the suspected misconduct.

## 3. Why do we collect and process personal data?

We process personal data collected through the reporting channel to investigate, evaluate, monitor and resolve suspicions of misconduct. In addition, data can be used to improve and analyse our operations and to compile statistics. Submitting a report is voluntary and the report can also be made anonymously. All messages received will be handled confidentially.

The reporting channel can be used to alert CapMan about illegal actions or unlawful misconducts affecting individuals, our company/organisation, the society or the environment, such as money laundering, market abuse, violations of data privacy, corruption, violations of CapMan's Code of Conduct or internal rules of process. Deliberate reporting of wrong or misleading information is forbidden.

## 4. What is the legal basis for processing?

Under data protection laws, we need to have lawful grounds for processing personal data. Sometimes more than one legal bases applies. The legal basis for processing personal data for the abovementioned purposes is primarily our obligation to comply with

applicable laws and regulations (such as market abuse regulation and the Finnish whistleblower protection act). Personal data may also be processed based on our legitimate interest or, where necessary, for the establishment, exercise or defence of legal claims.

## 5. What are our information sources?

We collect personal data mainly from the person who reports the suspected misconduct through the reporting channel. Other information sources are used within the limits of the applicable laws to the extent it is necessary for investigating and resolving the matter.

## 6. How and with whom do we share personal data?

All reports are directed to CapMan's Head of People Operations, Compliance Officer and Chief Operating Officer, who are responsible for processing the reports. In addition, Chair of the Audit Committee has the right to process and monitor all reports and the General Counsel has right to process reports.

CapMan's Head of People Operations, Compliance Officer and Chief Operating Officer may, with the consent of the reporting person, involve other relevant individuals in the processing of reports when it is needed. These individuals may be CapMan Group employees or external experts, such as consultants or advisors. The persons who have access to reports and personal data contained therein are bound to confidentiality.

The reporting channel is maintained by WhistleB Whistleblowing Centre Ab, an external service provider that processes personal data collected through the reporting channel in accordance with applicable laws and the agreement between CapMan and WhistleB.

We may disclose personal data to authorities, such as the police, on a case-by-case basis and in accordance with applicable laws and regulations, for example, in a situation where the report leads to a criminal investigation.

The personal data collected through the reporting channel is stored and processed in servers located within the EEA. CapMan does not transfer personal data provided through whistleblowing channel outside the EU or EEA.

## 7. How long is the personal data retained?

We generally retain personal data collected through the reporting channel as long as it is necessary for the purposes of the reporting channel or to comply with legal requirements. Information collected through the reporting channel will be generally stored for five years from submitting the report unless it is necessary to retain data for a longer period due to investigation of a crime, court proceeding, official investigations, or for the purposes of securing rights of the reporting person or the person who is subject to report. Personal data which are manifestly not relevant for the handling of a specific report will be deleted without undue delay.

## 8. How do we ensure that your personal data is safe with us?

We implement technical and organizational security measures to protect personal data from loss, misuse, unauthorized access, disclosure, alteration or destruction. Only specific personnel of CapMan are given access to the whistleblowing reporting system and to personal data it contains, and each user has a personal username and password to the system. These parties are bound to professional secrecy and are required to treat personal data strictly confidential.

## 9. What are your rights?

You are entitled to obtain information of your personal data that we process and have access to or obtain a copy of such personal data. You are also entitled to request us to correct, update or remove your personal data. To the extent required by applicable data protection law, you have a right to prohibit or restrict data processing.

You should be aware that certain information is strictly necessary for compliance with our legal obligations, which may set limits to some of

the rights listed above. In certain cases, we may have a legal right to restrict exercise of the abovementioned rights if it is necessary e.g. for investigation of a suspected crime or to protect identity of the reporting person.

If you find your legal rights violated, you have the right to file a complaint with a competent authority. According to the GDPR you may lodge complaint in the EU Member State of your habitual residence, place of work or place of the alleged infringement.

Please send any requests regarding your rights to [privacy@capman.com](mailto:privacy@capman.com). We will answer to your request within one month of receipt of your request unless there are justified reasons to extend this time by two further months. If we cannot fulfil your request, e.g. due to our obligations, we will inform you in writing within the same time frame and explain to you the reasons why we are unable to fulfil your request. You can lodge a complaint with the supervisory authority if you disagree with our decision.

## 10. Updates to Privacy Notice

We may amend this Privacy Notice from time to time.