

Privacy Notice for the Whistleblowing Reporting Channel

Data Protection Act (5 December 2018 / 1050)

Version	Date	Updated by
1.0	19 June 2025	Mikael Aikio
1.1	20 April 2026	Terhi Rautavaara

This privacy notice is based on the EU General Data Protection Regulation (GDPR) and the Finnish Data Protection Act (5 December 2018 / 1050), which regulate the rights of EU citizens to data protection and the confidential processing of their personal data.

Data Controller

Power-Deriva Oy (Business ID: 1625976-2)
Itämerenkatu 1, 00180 Helsinki, Finland

Person Responsible for the Personal Data Register

Toivo Toikka
Email: toivo.toikka@power-deriva.com

Name of the Register

Whistleblowing Reporting Channel

Purpose of Processing Personal Data

The Data Controller has an obligation based on an EU directive to maintain a whistleblowing reporting channel. The reporting channel enables reports of observed misconduct or unethical behavior. To process reports submitted via the reporting channel, the designated handlers require user accounts for the system. Creating user accounts requires the processing of the users' personal data. The reporting person may also enter personal data into the system related to the purpose of the reporting channel, insofar as such data is necessary for processing and investigating the report. The reporting person can only view their own report in the system. The purpose of processing personal data is the handling and investigation of reports submitted through the reporting channel. Personal data is processed only to the extent necessary for the intended use of the register.

Register Data Content

The register contains the names and email addresses of the report handlers appointed by Power-Deriva. The register may also process the following data:

- Identification details of the reporting person or the subject of the report, such as name, personal identity number, and contact information (address, phone number, email address);
- Employment-related information of the subject of the report (e.g. job duties and name of supervisor);
- The suspected violation or misconduct and related material.

Regular Sources of Data

The register contains information provided by the reporting person via the reporting channel, as well as personal data of the report handlers appointed by the Data Controller.

Regular Disclosure of Data

Data is not, as a rule, disclosed to third parties. However, data may be disclosed, for example, to authorities in cases of suspected criminal offenses or for other corresponding purposes.

Transfer of Data Outside the EU or European Economic Area

Personal data is not transferred or disclosed outside the European Union or the European Economic Area.

Data Retention Period

Personal data is retained only for as long as necessary for the purpose of processing or for as long as required by law.

Principles of Register Protection

The reporting channel is implemented using the First Whistle system operated by the Falcony / WeKomply Group and is not hosted on Power-Deriva's servers. The Data Controller's information systems and files are protected using standard technical security measures commonly applied in business operations. Access to the register is confidential and restricted to personnel of the Data Controller who have a personal user ID and password and whose position and duties require access. Employees of the Data Controller are subject to a duty of confidentiality.

Right of Access

Everyone has the right to inspect their personal data contained in the register. A written and signed request, or a request verified in another reliable manner, must be submitted to the person responsible for the personal data register mentioned above. Before disclosure of the data, the identity of the requesting person will be verified using a photo identification document.

Right to Rectification

Anyone who discovers that their personal data in the register is inaccurate, incomplete, or processed in violation of the purpose of the register or applicable legislation has the right to request correction, blocking, restriction, or deletion of the data. The request must be made in writing and submitted to the person responsible for the personal data register. Anyone who believes that their rights under the EU General Data Protection Regulation have been violated has the right to lodge a complaint with the supervisory authorities.

Amendments to the Privacy Notice

The Data Controller continuously develops its operations and reserves the right to amend this privacy notice. Legislation may also change, and therefore the content of this privacy notice should be reviewed at regular intervals.