Whistleblowing Privacy Notice for the FCG Group

Thank you for reporting to the FCG Group[1]! In this Privacy Notice, you will find information on how FCG collects, uses and retains your personal data in connection to our whistleblowing process. This Privacy Notice also includes information on how you can exercise your rights in accordance with the GDPR.

Data controller

FCG Risk & Compliance AB is the data controller for the processing of personal data in the context of legal obligation arising from the Swedish Whistle Blowing Act of 2018 (SFS 2018:890).

FCG Holding AB is the data controller for the for the processing of personal data in the context of the legitimate interest to ensure good business practices for the whole FCG Group and to ensure effective management of reports of potential misconducts in the FCG Group.

In this Privacy Notice, **FCG**, **we**, and, **our** refers to FCG Risk & Compliance AB and FCG Holding AB jointly. For further information on the legal basis of the processing of personal data, please read the section below *What legal grounds do we use to process your personal data?*

Why we need your personal data

When you report a misconduct or breach in FCG´s operations, FCG may need to process personal data about you. Currently only FCG Risk & Compliance AB is covered by the obligation to have reporting channels in accordance with the Swedish Whistleblowing Act. FCG operates in a heavily regulated industry in which trust and fair business practices are of the utmost importance, both for FCG and its clients. We therefore promote a culture where anyone within or outside FCG Group feels safe and is encouraged to act and report any wrongdoing related to our operations.

Types of personal data used

We process your personal data (name, contact information and other relevant personal data provided by you in the report) to be able to receive your report, have contact with you during the course of the case and to follow up what has been reported to us and to provide feedback to you.

The personal data in a whistleblowing report can relate to you as a reporting person, the person under investigation, witnesses or other individuals that are mentioned. Information to the accused person at an early stage may jeopardise the investigation and the disclosure of specific information with the accused might therefore be deferred. Deferral of information is decided on a case by case basis and the reasons for any restriction will be documented.

[1] The FCG Group consist of FCG Holding Sverige AB and all its subsidiaries.

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Depending on your company of employment some legal limitations may apply on who you can include in a report:

- If you are employed by FCG Risk & Compliance AB you can whistleblow on all FCG employees.
- If you are employed in any other company in the FCG Group, you can only whistleblow on persons in leading positions. This is due to legal limitations on what personal data a Swedish company is allowed to process if not covered by the Swedish Whistleblowing Act.

How is personal data collected?

Personal data will be collected directly from the person who reports a misconduct or breach in FCG´s operations. Personal data may also be collected during the investigation of a breach from other relevant persons (e.g. a witness) involved in the relevant whistleblowing case.

How will the personal data be used?

Personal data may only be used if the processing is necessary for follow-up reports and actions. This means that personal data is processed:

- at the reception of whistleblowing reports,
- when in contact with the whistleblower, and
- when necessary for follow-up action to be taken on the basis of what has emerged in a report.

Personal data that is processed for this purpose may also be processed in order to fulfil a submission obligation of information which is:

- when handing over information to the Police Authority if suspicions of a crime arise in a follow-up case,
- when necessary, handing in reports to be used as evidence in legal proceedings, or necessary for the establishment, exercise or defence of legal claims.
- otherwise takes place in accordance with law or regulation.

How long will FCG retain the personal data for?

Personal data which are manifestly not relevant for the handling of a specific Report shall not be collected or, if accidentally collected, shall be deleted without undue delay.

Personal data in a follow-up case may not be processed for more than two (2) years after the case was closed. The retention period is a requirement under the Swedish Whistle Blowing Act.

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Who has access to your personal data and where is your personal data stored?

Only persons who have been identified as a recipient of reports and that have been designated as competent to receive, follow-up and provide feedback on reports may have access to personal data that is processed in a follow-up case. Access to personal data is limited to what each involved person needs to be able to fulfil their tasks.

Your personal data will be stored within the European Economic Area ('EEA') and is secured with a sufficient level of technical standards and practices.

What legal basis do we use to process your personal data?

FCG processes your personal data according to Article 6(1)(c) GDPR. FCG has a legal obligation (*Swe. Lag (2021:890) om skydd för personer som rapporterar om missförhållanden)* to receive and manage reports of misconduct must therefore process certain personal data connected to the whistleblowing process.

For other companies in the FCG Group, that does not need to comply with the regulation mentioned above, the legal ground for processing your personal data is FCG´s legitimate interest to ensure good business practices for the whole FCG Group and to ensure effective management of reports of potential misconducts in the FCG Group (Article 6(1)(f) GDPR).

Your rights

As a data subject, you have several rights. If you have whistleblown and want to exercise your rights, please contact us at either whistleblow@fcg.se or the Chief Financial Officer (magnus.karlberg@fcg.se) if the report concerns the Chief People Officer.

You have the following rights through the GDPR (*please note the possible deferall of information to the person concerned as describe in this Privacy Notice*):

- **Right to access your personal data:** you have the right to obtain confirmation from us as to whether personal data concerning you are being processed, and, where that is the case, access to the personal data.
- **Right to rectification of personal data:** if you find that personal data that we process about you is inaccurate, you have the right to have us correct such personal data.
- **Right to erasure of personal data (right to be forgotten):** under certain circumstances, such as if your personal data has been unlawfully processed, is no longer needed for the purposes it was collected, or if you have withdrawn your consent (if the processing of your personal data is based on consent), you have the right to request and obtain erasure of your personal data from us.
- **Right to restriction of processing:** under certain circumstances, such as if you question the accuracy of your personal data or you have objected to our legitimate purpose to process your personal data, you have the right to request that we limit the processing of your

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personal data until a solution has been found. By "limited" is meant that the data is flagged so that it in future may only be processed for certain limited purposes.

- **Right to object to processing:** you have the right, on grounds relating to your particular situation, to object to processing on the basis of FCG's or a third party's legitimate interests, i.e. for the processing of personal data in the context of the Privacy Notice with the exception of the processing performed by FCG Risk & Compliance AB.
- **Right to data portability:** if your personal data is processed by automated means based on your consent or for the performance of our contractual relationship, you have the right to request that we provide you with your with personal data on a machine-readable format for transmission to another data controller. Please note that the right to data portability does not apply in the context of whistleblowing since whistle blowing is based on either a legal obligation or FCG's legitimate interest.
- **Right to lodge a complaint with a supervisory authority:** you have the right to lodge a complaint regarding our processing of your personal data with your national supervisory authority. The lead supervisory authority for FCG's operations is the Swedish Authority for Privacy Protection (sw: *Integritetsskyddsmyndigheten*): Swedish Authority for Privacy Protection | IMY. Employees in FCG's countries of establishment have a right to lodge a complaint with their national supervisory authorit in addition to the Swedish Authority for Privacy Protection.

Questions and exercising your rights

Should you have any questions on this Privacy Notice or how we process personal data, or want to exercise your rights, please contact either whistleblow@fcg.se or the Chief Financial Officer (magnus.karlberg@fcg.se) if the report concerns the Chief People Officer.

FCG reserves the right to modify this Privacy Notice and will post any changes to the Privacy Notice on our website and our intranet.

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