

Privacy statement – Whistleblowing – confidential feedback channel

Updated on 24 September 2019

1. Controller

Finnvera plc (Business ID: 1484332-4)
Street address: Porkkalankatu 1, 00180 Helsinki, Finland
Switchboard: +358 (0)29 460 11

2. Contact information

Contact: tietosuojavastaava@finnvera.fi

3. Name of data file

Whistleblowing – confidential feedback channel

4. Purpose of and grounds for the processing of personal data

Personal data received through the whistleblowing channel are processed to the extent that is required to appropriately and adequately handle the case reported through the channel.

The legal basis of the processing:

- compliance with legal obligations to which the controller is subject
- the controller's or a third party's legitimate interest

5. Data contained in the data file

The following information about the data subject can be recorded in the data file:

- Name and contact information of the person who submitted the notification (if provided by the person)
- Specification details regarding the person(s) reported (to the extent that they have been provided)
- Information that the notification provides about the suspected person(s) reported in the notification and his/her violations of law or ethical principles
- Information that the internal investigation of the case yields with regard to the actions of the person reported in the notification and the assessment of their compliance with law/operating principles

6. Retention of personal data

We store your data for as long as necessary for the purpose of their collection and processing or for as long as required by law and regulations.

7. Regular sources of data

- The notification received through the whistleblowing channel and information, if any, received in further investigation from the person who submitted the notification
- The material received and/or reported in connection with the internal investigation of the case

8. Regular disclosure of data and groups of recipients

Data is processed by a restricted group of processors in Finnvera. Data is not disclosed outside Finnvera without a legal basis (e.g. the handling of the case requires authorities, such as the police).

9. Transfer of data outside the EU or the EEA

Data is not regularly transferred to countries outside the EU or the European Economic Area.

10. Data file protection principles

Information contained in the data file is processed by a restricted group of processors. Information about the identity of the persons involved or any other information about them are not disclosed to outsiders, except to the extent that is necessary for the adequate investigation of the case.

The identity of the person who submitted the notification (if the person provided this information) is kept as confidential as possible considering the investigation of the case.

The access rights of the notification channel are restricted to a few designated persons. The controller's personnel are committed to complying with the confidentiality obligations. In addition, the employees have committed to complying with internal information security guidelines.

The information system that contains electronically stored data and its backup copies are located in locked facilities that are under surveillance. The hardware on which the data file is stored is protected and separated from the public network with a firewall and other technical means.

11. Automated decision-making

The data contained in the data file is not used for decision-making that has legal consequences to the person affected and is based on automated processing of data, such as profiling.

12. Data subject's right to object to the processing of their personal data

Related to their specific personal situation, the data subject has the right to object to the profiling affecting them and other processing activities that the controller performs on the data subject's personal data insofar as the basis of the processing of data is the controller's legitimate interest.

The data subject may file their claim concerning the objection in accordance with item 15 of this privacy statement. When filing their claim, the data subject should specify the specific situation that is the basis of their objection to the processing of their data. The controller may refuse to implement the request concerning the objection on the grounds provided by law.

13. Data subject's right to object to direct marketing

Data in the data file is not used for direct marketing.

14. Data subject's other rights related to the processing of personal data

The data subject has the right to inspect data that has been stored concerning them in the data file. The inspection request should be filed in accordance with the instructions provided in this privacy statement. The inspection right may be denied on the grounds provided by law. As a rule, the regular exercise of the inspection right is free of charge.

Insofar as the data subject themselves can do so, they must, without undue delay after learning about an error or after they themselves have detected an error and at their own initiative, correct, erase or supplement any data in the data file that is in violation of the purpose of the data file, incorrect, unnecessary, incomplete or outdated.

Insofar as the data subject is unable to correct the information, the correction request is filed in accordance with item 15 of this privacy statement.

The data subject also has the right to demand that the controller restrict the processing of their personal data—for example, in a situation where the data subject is waiting for the controller's response to their request concerning the correction or erasure of their data.

The data subject has the right to appeal to a competent supervisory authority if the controller has not complied with the applicable data protection regulations in its operations.

15. Contact information

The data subject should contact the controller in all matters concerning the processing of personal data and the exercise of their own rights. The data subject may exercise their rights by contacting tietosuojavastaava@finnvera.fi.