

# **Privacy Notice for Hanken's Whistleblowing Channel**

At Hanken, the protection of your personal data and privacy, as well as the responsible processing of your data, is of utmost priority.

This page describes the processing of personal data on Hanken's websites. A general description of personal data processing at Hanken can be found <u>here</u>.

#### 1. Data Controller and Contact Information

Data Controller: Hanken School of Economics (hereafter: Hanken)

Contact Information of the Data Controller: P.O. Box 479, 00101 Helsinki, Phone: +358

(0)29 431 331

Contact person for data processing inquiries: Anna-Charlotta Waselius, anna-

charlotta.waselius@hanken.fi

Contact Information for DPO: dpo@hanken.fi

## 2. Why Does Hanken Process Your Personal Data?

Hanken processes your personal data in order to manage reports submitted through the whistleblowing channel.

# 3. What is the Legal Basis for Hanken's Processing of Your Personal Data?

The processing of personal data is primarily based on Article 6.1(c) (legal obligation) of the GDPR. Hanken has a statutory obligation to process reports of potential violations or activities that are contrary to the law, submitted through the whistleblowing channel.

#### 4. What Personal Data is Collected and Processed at Hanken?

Hanken only processes personal data that is necessary for the specific purpose for which it is collected. The personal data collected includes:

- Name
- Contact information (e-mail and phone number)
- Any other information provided in connection with the report or revealed during the investigation of the matter

Your personal data is only processed by individuals employed by Hanken or working on its behalf, who have the right to process the data. Only those for whom the processing is necessary for their work responsibilities will process the data.

### 5. How Does Hanken Collect Your Personal Data?

Data is collected from the following sources:

- Directly from you
- The whistleblower
- Individuals involved in the handling of the case

#### 6. To Whom May Hanken Disclose Your Personal Data?







If required by the nature of the case, your personal data may be transferred to the police authority in connection with a criminal report.

#### 7. Transfer of your Personal Data to Third Countries

Your personal data is not transferred to third countries outside the EU/EEA. Hanken regularly reviews its data transfer practices.

### 8. How Long Is Your Personal Data Stored?

Data obtained through the whistleblowing channel is generally stored for a maximum of five years. However, the data may be retained for a longer period if necessary to comply with legal obligations or to establish, exercise, or defend legal claims. When the data is no longer needed for these purposes, it will be deleted without delay.

## 9. Your rights under the GDPR

#### 9.1. Right of Access and Right to Rectification of Personal Data

In accordance with the GDPR, you have the right to know what personal data Hanken processes about you. You also have the right to have inaccurate personal data rectified, without undue delay. If your personal data is incomplete, you have the right to have data completed, with regards to the purpose of the processing.

# 9.2. Right to Erasure and Withdrawal of Consent

You have the right to request the erasure of your personal data if it is no longer needed for the purpose for which it was collected or processed. However, this right does not apply if the processing is necessary for:

- Compliance with a legal obligation,
- The performance of a task carried out in the public interest or in the exercise of official authority vested in the controller,
- The establishment, exercise, or defence of legal claims, or
- Exercising the right of freedom of expression and information.

If the processing of your personal data is based on consent, you have the right to withdraw your consent. If there is no longer a legal basis for processing after withdrawal, your personal data will be deleted.

# 9.3. Right to Restriction of Processing

You have the right to request the restriction of the processing of your personal data in certain situations. This applies if:

- You contest the accuracy of the personal data during the period required to verify the data,
- The processing is unlawful, and you oppose the erasure of the personal data and instead request the restriction of its use, or
- Hanken no longer needs the personal data for the original purpose, but you need them to establish, exercise, or defend legal claims.

# 9.4. Right to Data Portability

You have the right to receive your personal data that you have provided to Hanken or to have your personal data transmitted to another controller in certain cases.

# 9.5. Right to Object to Processing

You have the right to object to the processing of your personal data if the processing is based on a public or legitimate interest.

### 9.6. Right Not to be Subject to Automated Decision-making

You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.

## 10. Exercising Your Rights

To exercise your rights under the GDPR, you may contact Hanken's Data Protection Officer by email at: dpo@hanken.fi.

If you believe that the processing of your personal data violates the provisions of the GDPR, you have the right to file a complaint with the Office of the Data Protection Ombudsman.

# 11. Right to be Informed of a Personal Data Breach

If a personal data breach occurs that is likely to result in a high risk to your rights and freedoms, Hanken, as the data controller, is obliged to inform you of the incident without undue delay.