

# **Privacy Notice for ESSITY's Whistleblowing System**

## **1. Introduction**

("Essity" or "we" or "us") takes data privacy seriously. This Privacy Notice describes how Essity as a data controller within the meaning of the General Data Protection Regulation ("GDPR") collects and processes the personal data pertaining to (i) the reporter and (ii) the individual who is the subject of the report (i.e. the person in breach).

The use of Essity's hotline is always voluntary and is intended to complements other reporting options set out in Essitys's Code of Conduct.

#### 2. Data controller

Essity Aktiebolag (publ) on behalf of the Essity Group ("Essity") is the main data controller for the processing of your personal data.

### **3. Collection and processing of Personal Data**

- 3.1. When you make a report through the Essity's Reporting Hotline, we will collect the following types of personal data about you:
  - a) Your name, address, contact number and/or email address if provided by you (unless you choose to report anonymously);
  - b) Any additional information you provide about yourself voluntarily either by freetext or that is included in any documentation you provide to us.
  - c) In the event we need further information from you, or have questions in relation to your report, to protect the confidentiatlity of the information you give to us, we will communicate with you directly through the Essity's Reporting Hotline, or through any other form of communication you have consented to us using. Any other personal data collected during these communications will be handled in accordance with this privacy notice.
  - d) Your call-in details, recorded voice message, name or IP-address, will never be disclosed to Essity unless you voluntarily submit such information in the report.
- 3.2. Please note that any information, including personal data, in the report may be transferred to the local Essity operating unit (joint controller) where the alleged



breach has been observed in order to be further investigated by Essity's internal investigators in the Human Resources and Internal Audit departments or by law enforcement authorities or by other local authorities. All information will be processed only to the extent necessary in order to investigate the suspected breach. The information will be processed with highest care and integrity.

3.3. Please be informed that the personal data and information may also be processed by technical staff at SpeakUp/ People InTouch in the course of obtaining communications between you and the Compliance & Ethics Office, and if translation of your report is needed. Data collected is stored on servers located in the Netherlands and Germany. Essity has entered into contractual agreement with SpeakUp/ Intouch, to secure that the information and personal data you provide in the hotline is handled in accordance with applicable laws.

#### **4. Legal basis for processing of your Personal Data**

The personal data is processed on the basis of a so called balancing of interests where Essity's interest to evaluate and identify suspected serious violations of law or regulations or Essity's Code of Conduct is deemed legitimate with regards to the potential risk that such breaches or unlawful activities may lead to severe reputational, financial or legal consequences for Essity.

#### **5. Retention of Personal Data**

Your personal data will be retained as long as necessary for investigation including a resolving remediation of any shortcoming discovered and the handling of any following litigation. Your personal data can be retained for a longer period if this is required due to legal, regulatory or contractual obligations to retain records or if it is permitted by local legislations. Your personal data will be deleted as soon as this is required by local legislations.

#### 6. Contact details and your rights

For contact details and information about your rights according to the applicable data protection legislation, please go to <u>Privacy Policy (essity.com)</u>.