

ALEIDO

Whistleblowing Privacy Policy



Privacy Policy for Aleido's Whistleblowing System

Aleido Group AB (below "Aleido") apply a whistleblowing system in order to allow Aleido employees and external persons to anonymously report improprieties occurring within or pertaining to Aleido.

In order to be able to administer the reporting within the whistleblowing system, Aleido will need to process certain personal information about you either as a reporter or as a reported person. Please note that it is not mandatory to submit your name and personal information when reporting suspected improprieties in the system, but the information that you provide will be processed in accordance with this Privacy Policy.

The purpose of this Privacy policy is to inform you as a reporter or reported person in Aleido's whistleblowing system of how Aleido processes your personal information when you are registered in the system.

Aleido is committed to protecting the integrity and security of your personal data in accordance with applicable data protection laws, including the EU General Data Protection Regulation (GDPR).

Data Controller

Aleido Group AB is the data controller when processing your personal data in connection with the whistleblowing system (the "personal data"), which means that Aleido is responsible to ensure that your data is processed lawfully.

In order to maintain confidentiality and impartiality the report is received by Sem- con's General Counsel as well as an external legal counsel. If it should be inappropriate for the matter to be handled by the General Counsel, the external legal counsel will handle the matter. The external legal counsel act as a data processor on behalf of Aleido.

The data will only be processed within EU.

What data is processed?

The personal data processed includes name, job title, e-mail address and suspected improprieties as applicable.

For what purposes are the data processed?

Aleido will store and process your personal data to administer the whistleblowing system and in order to act upon received reports.

The legal basis for the processing of personal data is Aleido's legitimate interest to collect and follow up on reported improprieties occurring within or pertaining to Aleido. We consider that our legitimate interests abide by the law and the legal

rights and freedoms you have as a reporter or reported person.

How long will the data be stored?

Your personal data will be stored during the time that the reported matter is under investigation. Unless Aleido has a legal obligation to store the information longer due to mandatory legislation the personal data will be deleted thirty (30) days after completed investigation. If the investigation results in disciplinary action, the data will be stored during the disciplinary procedure for evidence purpose and will thereafter be deleted from the system once the disciplinary action is finalised. If you have voluntarily provided your information when reporting the matter you may at any time ask us to remove your personal information. The information regarding the reported inproprieties must however be stored until the investigation until the investigation or disciplinary procedure is finalised. The longest your data will be stored is two years after finalised investigation or disciplinary procedure.

The personal data will be handled with confidentiality and care. Your personal data will only be available to a very limited number of people who need access in order to investigate the reported matter.

In the case of suspicion of crime, the personal data can be made available to the law enforcement agencies, such as a police authority.

Your rights

You are free to request information about the personal data processed about you. If you would like such information, please send a written signed request to Aleido Group AB at the contact details set out below or by sending an email to dataprotection@aleido.com. For Aleido Germany, please contact [PI-GE-](#)

datenschutz@aleido.com. If your personal information is incorrect or has been processed in violation of applicable data protection laws, you are entitled to request that the personal data is corrected, blocked or deleted.

You are entitled to contact the Swedish authority for Privacy Protection (sw.integritetsskyddsmyndigheten), which is the supervisory authority regarding Aleido's processing of personal data through the whistleblowing system.

Contact Details:

Aleido Group AB
Lindholmsallén 2
417 80 GÖTEBORG, SWEDEN