

Privacy in Whistleblowing Matters

M Refine Group AB processes personal data in whistleblowing matters in order to receive, assess, investigate, provide feedback on and document reports in accordance with applicable whistleblowing legislation. The processing may include data relating to reporting persons, persons concerned, witnesses, investigators and other individuals appearing in the matter.

The data processed may include, for example, names, contact details, case information, communications and investigation material. Depending on the nature of the matter, special categories of personal data or data relating to criminal offences may also be processed. The legal basis is primarily compliance with a legal obligation, although processing may in certain cases also be necessary for the establishment, exercise or defence of legal claims or be based on legitimate interests.

As a general rule, personal data is erased no later than two years after the matter has been closed, unless longer retention is required by law or for legal claims. Erasure is carried out through a documented review process, and anonymised statistics are kept separate from personal data.

Data may be shared with the whistleblowing service provider, external investigators or legal advisers, competent authorities where necessary, and relevant system providers and processors. Any transfer outside the EU/EEA must be supported by a valid transfer mechanism and appropriate safeguards.

Further information is available in M Refine Group AB's full privacy notice. Questions may be sent to privacy@mrefinegroup.com