

Information regarding the treatment of personal data in Fortum Corporation's Raise a Concern -notification channel

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The person in charge of the processing of personal data	Outi Laaksonen, Vice President, Internal Audit POB 100, FIN-00048 FORTUM, Finland Phone: +358 10 4511, <a href="mailto:outi.laaksonen@fortum.com">outi.laaksonen@fortum.com</a>
The purpose and legal basis for processing personal data	"Raise a concern" notification channel enables you to report an observed or suspected action against the Code of Conduct of Fortum Corporation.  Processing of personal data is necessary when investigating the suspected action against the Code of Conduct. The legal basis for this is the legitimate interests of Fortum Corporation. The process is designed to ensure compliance with the Code of Conduct, and lawfulness of Fortum Corporation's operations.  The personal data collected in the notification channel will be processed only for the purpose specified above.
Types of personal data processed	We may collect and process the following data about you:  - Information you give us when filing a report on the notification channel. This may include your name, address, email address and telephone number.  - Information which is automatically recognized by our server, including where available, your IP address.  - Your occupational details such as your work contact details, if you are a Fortum Corporation employee.  We may also collect and process any other personal data that you choose to provide us, relevant to the alleged misconduct.
Recipients of the personal data	The information collected through the notification channel is access controlled. The personal data we receive through the notification channel is disclosed to our Internal Audit and Compliance teams involved in the investigation and is restricted to those with a legitimate need to know.  When necessary, we disclose certain data to our third party advisors. If a third party processes personal data on our behalf, we always ensure that the persons authorized to process the personal data have committed themselves

	<p>to confidentiality or are under an appropriate statutory obligation of confidentiality.</p> <p>We may also disclose data to the authorities if the legislation so permits, and if it is necessary for resolving the case.</p>
Personal data storage period	<p>We will retain your personal data for no more than two months after it has been submitted, after which it will be deleted from the system, unless there are further actions taken by Fortum Corporation.</p> <p>If action is taken, the information will be saved as long as necessary for the investigation; e.g. for finalizing the process with the authorities or going through the legal process with all the appeals processes.</p> <p>We constantly review the necessity of the data we hold. Once the data is no longer necessary, we delete it without undue delay.</p> <p>The data storage period may be longer than stated above, if the information is needed for insider reporting. However, these reports will not contain personal data or the data has been anonymized in such manner that it no longer permits your identification.</p>
Regular sources of information	<p>Principally, the personal data we receive and process comes from the announcer/notifier. The "Raise a concern" notification channel is available to employees as well as to external parties, such as suppliers.</p> <p>When making a notice, we encourage you to disclose your identity. However, the notice may also be made anonymously.</p> <p>Misuse of the notification channel is strictly prohibited .</p> <p>The notification can be made 1) by filling in a web form online at <a href="http://www.fortum.com">www.fortum.com</a>, in Corporate Governance section, 2) by sending an email to Corporate Internal Audit: <a href="mailto:internal.audit@fortum.com">internal.audit@fortum.com</a>, or 3) by sending postal mail to the address detailed at the beginning of this document.</p> <p>Kindly note that in Sweden, due to the Swedish legislation, the notification can be made by phone or email only.</p>
Data transfer outside the EU and EEA	<p>As a general rule, we do not transfer data outside the EU or the EEA. Only when the notice relates to a Fortum company or its employee, locating outside of an EU or EEA country, the data may be transferred to that company to the extent it is necessary in resolving the case.</p> <p>In such a situation, we will ensure that appropriate safeguards are in place in accordance with existing privacy legislation.</p>

<p>Security measures regarding processing of personal data</p>	<p>A) Manual materials  Manual materials (such as postal mail or notification received over the phone) will be maintained in Internal Audit's premises, which are controlled with limited access. The material is stored in a locked storage. The people processing the information work under the obligation of secrecy and they have been instructed on the sensitivity of the information.</p> <p>B) Digital material  The online notification channel uses technical data protection aiming at keeping the entered information intact and available only to those who are entitled to access the information. The site has been designed keeping in mind the prevention of malware and attacks via Internet.</p> <p>We only process personal data that is necessary for the investigation. Once your personal data is no longer needed or is deemed unnecessary for the investigation, we will delete it without undue delay.</p> <p>The people processing the information work under the obligation of secrecy.</p>
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Find out more about data privacy and your rights as data subject here: <https://www.fortum.com/privacy-notice-job-applicants-and-employees>.