

## **Privacy Notice – Ethics Online**

### **1. Data Controller**

Neste Corporation  
Business ID 1626490-8

### **2. Contact information**

Neste Corporation  
Keilaranta P.O.  
Box 95  
00095 Neste, Finland  
Street address: Keilaranta 21, Espoo  
Telephone (switchboard): +358 10 45811

The contact information for other Neste locations can be found on our website at [neste.com](http://neste.com).

### **3. What are the purposes and grounds for processing personal data?**

Ethics Online facilitates the secure and anonymous communication between reporters and their organization about possible serious acts of wrongdoing, including unlawful and criminal behavior.

Neste collects and processes your personal data in order to give a voice to the external stakeholders or employees on the workforce to make reports in case of non-compliance with the Code of Conducts, policies, rules, regulations and laws. For EU countries the processing of personal data is based on compliance with the legal obligation from the Directive (EU) 2019/1937. For other than EU countries the processing of personal data is based on Neste's legitimate interest to provide a reporting tool for concerns.

### **4. What data is collected and from where?**

Reporting a concern can be made anonymously, if desired. However, personal information could potentially be collected when an external stakeholder or employee leaves a free-format message when reporting about misconduct/concern against Code of Conduct. This could be: name, address, residence, title, nationality, phone number, email address, employment history, information about supervisor, information about the incident.

For Ethics Online the data sources could be:

- Person(s) who are the topic of a report
- Person who makes the report
- Persons(s) who receive the report
- Data from different sources (social media, pictures or reports etc. )

## **5. Who has access to your personal data and who do we disclose your personal data to?**

Personal data is processed by Neste Investigation Group.

Neste does not regularly disclose your personal data to external parties. However, Neste may transfer your personal data to business partners providing services to it or such business partners may be provided access to Neste's systems that contain your personal data. In such cases, the business partner in question processes your personal data on Neste's behalf and in accordance with Neste's instructions and has signed an agreement, among other things, to keep your personal data confidential.

## **6. Notification of international transfers of data**

The service providers who may access the data are all located in the EU/EEA or in some cases, within countries with an adequate level of protection.

When transferring or disclosing personal information outside of the EU/EEA, Neste complies with legal requirements and if required, uses specific safeguards, such as Commissions model clauses.

## **7. How long is your data stored?**

Neste will only retain your personal data for as long as is necessary for the above mentioned purposes. Generally, we won't retain personal data about you after the misconduct investigation case is closed — unless we have a legal reason requiring us to retain it for longer.

## **8. What rights do you have and how can you exercise them?**

You can exercise your rights listed below by submitting Neste's privacy request form:

<https://www.neste.com/corporate-info/who-we-are/privacy>.

You have the right to access your own personal data and the right to correct incorrect data concerning you.

You also have the right to request that your data be deleted. However, please note that it may not always be possible to delete data due to statutory obligations.

You have the right to object to the processing of personal data that is based on Neste's legitimate interest. You can object to processing on grounds relating to your particular situation. You must specify the particular situation forming the grounds for the objection when making the demand. Neste can deny the request on the grounds provided by law.

You also have the right to demand that Neste restricts the processing of your personal data, for example, when you are waiting for Neste's response to your request to correct or delete your data.

You also have the right not to be subject to an automated decision process without legal grounds.

### **9. Right to submit a complaint to a supervisory authority**

If you feel that Neste has not complied with applicable data protection regulations in its activities, you have the right to complain to the national data protection authority.