

Processing of personal data in Tana's Whistleblowing channel

Data controller

Tana Oy (hereinafter "Tana")
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What information do we process?

Tana acts as a data controller together with the companies belonging to the group. We process personal information related to whistleblowing reports. Data subjects are persons who have a significant connection with the data controller, either as a notifier or as a party.

We store the following personal information data on the Whistleblowing channel:

- Whistleblowing team (contact information, identification)
- Technical identification of the whistleblower (timestamps, report identifier)
- Information received in connection with the report and its processing regarding the suspected misconduct and the possible parties involved in the case
- Whistleblower information (if the report is not anonymous)
- Whistleblower's relationship with Tana

Reports may include information about specific groups of personal data.

We collect personal data that is necessary for the purpose of processing. Information shall not be collected or stored in larger quantities or for longer than necessary for that purpose.

Where is the data collected?

We collect information from whistleblower, interested parties and other relevant parties in the Whistleblowing channel that is necessary for the processing of reports.

In addition, we may receive information from the following sources to investigate suspected abuse:

- Tana organization (e.g., other employees)
- Authorities (e.g., suspected crime)

No attempt shall be made to identify the anonymous whistleblower, and no personal information about the whistleblower should be collected.

Why is the data processed?

We process the personal data of the Whistleblowing channel to create the opportunity to report suspicions of misconduct related to Tana's operations and to investigate any suspicions of misconduct that may arise from such reports. A more detailed description of the handling and investigation of reports can be found in the Whistleblowing guidelines.

Tana complies with both the EU General Data Protection Regulation (2016/679) and its local regulations and orders. Whistleblowing and the protection of whistleblowers are regulated by the Whistleblowing Directive (EU) 2019/1937 the Whistleblower Protection Act. According to the legislation, both private and public sector organizations must have a Whistleblowing channel in which suspicions of abuse can be reported in confidence. The organization shall handle reports carefully and securely, protecting the confidentiality of the whistleblower and those reported, and refraining from retaliation.

To whom is the information disclosed?

We regularly disclose personal information from the Whistleblowing channel to the authorities for the purposes required by law. In addition, we provide information to Tana's contractual partners, if necessary, whose assistance we need to process the reports. Such partners include, for example, legal and business advisers involved in the processing of the report.

Who processes the data?

At Tana, the information in the whistleblowing channel is processed by separately defined persons belonging to the Whistleblowing team and they are trained for the task. The case handlers are, for example, those responsible for human resources, information and financial administration, who are bound by professional secrecy regarding the personal data processed.

We only process personal data within the European Union (EU) and the European Economic Area (EEA).

WhistleB, Whistleblowing Center provides Pinja with a Whistleblowing channel and thus acts as a data processor of the personal data of Tana's Whistleblowing channel.

How long is the information retained?

We retain personal information related to the report in the Whistleblowing channel for as long as the retention of the information is necessary to investigate the suspicion of misuse. Personal data shall be permanently deleted when they are no longer necessary to process.

The statistical information of the reports shall be retained for an indefinite period (anonymized statistics that do not contain personal data).

We strive to keep your information up to date and discard incorrect information.

Your rights

As a data subject under the Data Protection Regulation, you have the right, within the limits and in accordance with applicable data protection law:

- to receive information on the processing of personal data
- to request access to your own personal data
- to request the amendment or deletion of your personal data
- to request a restriction of processing or oppose processing
- to transfer personal data from one system to another, i.e. receive your personal data in a structured and commonly used form, and transfer them to another data controller

However, please note, that, as data controller, we may refuse a data subject's request, in whole or in part, for a valid reason in accordance with applicable data protection law. We may refuse your request, for example, in situations where the execution of the request could jeopardize someone else's rights.

If you consider the processing of your personal data to be inappropriate or illegal:

- Take the matter up with Tana's data protection officer (IT Manager)
- Report abuse anonymously in Tana's Whistleblowing channel: <https://report.whistleb.com/en/tana>
- You can also always notify the [Data Protection Ombudsman](#) of the processing of personal data.