

Information for Reporting Persons and Other Individuals

Data Controller

MEKO AB (company registration number 556392-1971) or MEKO Services AB (company registration number 556840-9428) is the data controller for the processing of personal data in connection with the reporting of misconduct. Contact details and information about representatives are available on MEKO's website.

General Information on the Processing of Personal Data Following a Report Submitted Through the Whistleblowing Channel

Reports are submitted through KPMG AB's web application or voicemail service. A specifically authorized case handler at KPMG AB is assigned to the case and can then read or listen to the report.

Only the employee(s) assigned to a case in the reporting system can access the report and any correspondence with the reporting person.

The reporting person may choose to remain anonymous; however, this may make it more difficult to follow up on the information provided.

The web application includes a messaging function. When reporting persons send messages regarding a reported case, the case handler only sees the case reference number as the sender.

When a report is received, an initial assessment is made of the information provided and whether additional information is required. KPMG AB then provides a recommendation to the data controller regarding further handling of the case. Decisions regarding actions to be taken are always made by the data controller.

Possible actions may include:

- Closing the case (for example, due to insufficient evidence or other reasons);
- Initiating a more in-depth investigation;
- Referring the matter for internal or external handling.

Reporting persons are encouraged not to provide information that is irrelevant to the matter. This includes knowingly false allegations and information that may be considered offensive.

Purpose of the Processing of Personal Data

The purpose of processing personal data in connection with whistleblowing cases is to enable MEKO to prevent, detect and address misconduct within its operations and, in certain cases, to establish, exercise or defend legal claims arising from reported misconduct.

The processing of personal data also enables MEKO to comply with its obligations under applicable whistleblowing legislation and regulations, including the Swedish Act on the Protection of Persons Reporting Misconduct.

Legal Basis for the Processing of Personal Data

The legal basis for the processing of personal data in connection with internal and external reporting is that such processing is necessary for compliance with legal obligations to which the data controller is subject.

Recipients of Personal Data

Reports submitted through the whistleblowing service are handled by KPMG AB using the reporting platform provided by KPMG AB. Information in the system is stored within the European Union and processed on behalf of the data controller by specifically designated employees of KPMG AB.

In addition, information containing personal data may be disclosed to contact persons designated by the data controller, the police, public prosecutors, or other authorities. Whether information needs to be disclosed depends on the circumstances of the individual case, for example if it is necessary to initiate an employment-related matter or report a suspected offence to the police.

Retention of Personal Data

Personal data collected for the handling of whistleblowing cases is retained for no longer than two years after the processing of the case has been completed.

A whistleblowing case is considered completed when the whistleblowing function has taken final action in the matter, for example when the data controller has decided to close an investigation, refer information for further investigation or handling, and when any legal proceedings have been concluded.

Categories of Personal Data

The categories of personal data processed in a whistleblowing case depend on the information provided by the reporting person and information collected from other persons or sources to investigate or verify the report.

The following categories of personal data may be processed:

- contact details
- personal identity numbers or coordination numbers
- employment information such as position
- income information such as salary, benefits, investment income and business income
- information on assets and investments, including bank accounts, securities and property holdings
- trade union membership
- sexual orientation
- religious or philosophical beliefs
- racial or ethnic origin
- political opinions
- information concerning a person's sex life
- health data
- suspected or confirmed violations of laws, regulations or internal rules

As the data controller does not control the information submitted through the reporting channel, the above list may not be exhaustive.

Source of the Data

Personal data is collected from persons submitting reports and may also be collected from:

- other persons who may have relevant information regarding the case
- publicly available sources and search services

- social media
- authorities such as the Swedish Tax Agency, the Swedish Enforcement Authority and courts

Rights of Data Subjects

Subject to certain limitations and exceptions, data subjects have the right to:

- access personal data relating to them
- request correction of inaccurate personal data and completion of incomplete data
- request deletion of personal data
- request restriction of processing
- receive and transfer their personal data to another controller (data portability)
- object to the processing of their personal data in certain circumstances, including profiling based on legitimate interests

Requests to exercise these rights may be sent to: gdpr@meko.com

Individuals whose personal data is processed also have the right to lodge a complaint with the Swedish Authority for Privacy Protection (IMY).