

Whistleblowing and data privacy

1 INTRODUCTION

- 1.1 This document contains information about Boliden's processing of personal data within Boliden's whistleblower system provided by the independent external third party WhistleB Whistleblowing Centre AB. Information on how a whistleblower report is handled can be found in Boliden's Whistleblower Instruction.

2 WHAT PERSONAL DATA IS PROCESSED

- 2.1 We process all types of personal data that may occur in a report, such as name, role, description of work tasks etc. If the person sending in the report chooses to reveal his identity and contact details, such name and contact details are also processed.

3 PURPOSE AND LEGAL BASIS FOR THE PROCESSING

- 3.1 The personal data in the whistleblower system is processed in order to handle concerns regarding actual or suspected serious wrongdoings.
- 3.2 The processing is based on the legal basis legitimate interest and is necessary to fulfil the above purpose.

4 DATA CONTROLLER AND DATA PROCESSOR

- 4.1 Data controller: Boliden Mineral AB
Phone: +46 (0)8 610 15 00
Address: Box 44, 101 20 Stockholm
- 4.2 Data processor: WhistleB Whistleblowing Centre AB
Phone: +46 (0)70 444 32 16
Address: Box 70396, 107 24 Stockholm

5 WITH WHOM WE SHARE/MAY SHARE YOUR PERSONAL DATA

- 5.1 Personal data may be disclosed to:
- legal entities (companies) within Boliden other than Boliden Mineral AB,
 - so-called processors (other companies which process personal data on Boliden's behalf) e.g. suppliers of IT systems, system management and support, or IT infrastructure providers.
- 5.2 At Boliden, access rights to data in the whistleblower system are restricted so that only persons who need the information in order to handle reports and conduct investigations can access it.

Developer	Title	Valid from
Martina Persson Hollsten	Whistleblowing and data privacy	10/31/2019
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- 5.3 Boliden uses WhistleB as a data processor for the whistleblower system. WhistleB may only process personal data in the whistleblower system in accordance with Boliden's instructions. A data processing agreement has been signed between Boliden and WhistleB.
- 5.4 In the event that it is necessary for the investigation, it is also possible that parts of the material is shared with other processors to Boliden, within or outside Sweden. Personal data may thus be transferred to a country outside the EU/EEA. If personal data is transferred to a country in which an adequate level of protection for personal data has not been assessed, Boliden will ensure that appropriate safeguards are taken.

6 FOR HOW LONG DO WE STORE THE PERSONAL DATA?

- 6.1 The personal data will be deleted from the whistleblower system after review and decision that a report is not a whistleblower case. The case may then be forwarded for handling in accordance with Boliden's ordinary reporting routes. In case a report moves forward to an investigation, all personal data will be deleted from the whistleblower system when the investigation has been concluded and closed, with the exception of when personal data must be maintained according to applicable laws and regulations.

7 YOUR RIGHTS

- 7.1 You have the right to request;
- information about the use of your personal data and
 - correction of incorrect personal data.
- 7.2 In certain cases, you also have the right to erasure of personal data, or restriction of the processing, and you are entitled to object to the processing.
- 7.3 The rights stated above are subject to any overriding safeguarding measures required to prevent the destruction of evidence or other obstructions to the processing and investigation of the case.

8 BOLIDEN'S DATA PROTECTION OFFICER

- 8.1 Boliden has appointed a data protection officer (DPO) who shall on an overall level ensure that we comply with the GDPR. The DPO can be reached at dpo@boliden.com and by telephone +46 8 610 1551.

9 COMPLAINTS

- 9.1 If you think that Boliden's processing of your personal data contravenes data protection legislation, we ask you to contact Boliden using the above contact details, so that we can rectify any inaccuracies.
- 9.2 Complaints can be submitted to the supervisory authority (the Data Protection Authority in Sweden or your local supervisory authority) where you believe that Boliden is processing your personal data in violation of data protection legislation.

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