

PRIVACY STATEMENT FOR KONE COMPLIANCE LINE

2 May 2021, v. 1.3

This privacy statement provides general information on the processing of certain personal data specified below by KONE Corporation and its employees, partners, subsidiaries and affiliates (“**KONE**”) in connection with the KONE Compliance Line, through which KONE employees can make reports on violations of the KONE Code of Conduct.

1. Data Controller

KONE Corporation and other KONE Group Companies, as applicable.

Street Address:

KONE Building

Keilasatama 3

FIN-02150 Espoo, FINLAND

Telephone: +358 204 751

Contact person: Brad Mitchell

2. Personal data KONE processes

KONE employees, KONE customer's, KONE contractors as well as general public can make reports about violations of KONE's legal or regulatory obligations, KONE Code of Conduct or KONE Supplier Code of Conduct through the KONE Compliance Line. In connection with the reports, certain personal information on the person making the report as well as on the subject of the report may be collected and processed.

The following information may be processed:

- Name and contact information;
- Job title and other employment information; and
- Other information possibly included in the initial report e.g. information about the alleged wrongdoer.

Reports may be submitted anonymously where permitted by law. In those cases KONE will not receive the name or contact information of the reporting person.

This personal information is referred to as “personal data” in this privacy statement. No sensitive personal data is expected to be collected or processed.

3. The purposes of the processing

KONE processes personal data for the purpose of investigating reports made through the KONE Compliance Line.

KONE processes the personal data for the purpose of ensuring that KONE entities, KONE employees, KONE suppliers and other KONE partners comply with local legislation and regulatory requirements, contractual obligations and other legal and compliance obligations of KONE Group. The legal ground for processing is KONE's legal obligations as well as KONE's legitimate interest.

No automated decision-making is used.

4. Source(s) from which the personal data originate

The personal data is obtained from both KONE internal sources (employees or externals with KONE accounts) and external sources (e.g. customers, suppliers, private individuals) as reporting is made available publicly in KONE websites. Depending on the nature of the case and the local laws applicable, also other sources can be used when investigating the report and made allegations, such as other persons involved in the case or KONE IT systems from which evidence may be gathered.

5. Transfers of and access to personal data

The phone and web reporting tools for the KONE Compliance Line are provided by a Dutch company called People Intouch B.V, established under the laws of the Netherlands and having its registered office at **Olympisch Stadion 41, 1076 DE Amsterdam, the Netherlands**. People Intouch's servers where the reported data is processed are located in the Netherlands. KONE Corporation has entered into a Data Processing Agreement with People Intouch.

The data is protected in accordance with People Intouch's Information Security Policy. The reports are accessible to relevant employees of People Intouch and, as necessary, to translators. People Intouch employees and translators are bound by confidentiality obligations.

Password protected access rights to the data within KONE's organization are strictly limited to named persons from KONE's Global Compliance team. KONE's Global Compliance team keeps such information in confidence and only shares the content of reports with other relevant stakeholders in KONE Corporation or other KONE group companies, such as global or local HR, legal or cybersecurity representatives, as necessary, to manage and resolve each individual reported case. Taking into account the legitimate interest KONE has to investigate and resolve reported cases, KONE uses its best efforts to keep the amount of shared personal data to a minimum e.g. by sharing the report to these relevant stakeholders in anonymized form (if possible) and including only persons who are relevant to investigating or resolving the case. Reports are not shared between different KONE group companies, unless this is necessary for the purposes of investigating or resolving the case.

6. Retention period of the personal data

Personal data processed shall be kept as long as needed to resolve the relevant case and thereafter for archiving purposes up to 7 years.

7. Data subjects' rights

Data subjects whose personal data is collected through the Compliance Line have the right to request access to and rectification of their personal data from KONE. In certain cases data subjects also have the right to request erasure of their personal data or restrict or object to the processing. In these cases data subjects are advised to contact: personaldatarequest@kone.com.

KONE is not obliged to provide access to personal data where such access would prejudice the integrity of an investigation or the rights of other persons involved in the investigation.

In the event data subjects have concerns or remarks regarding KONE's processing activities, they also have the right to lodge a complaint with a supervisory authority.

