

1 Filing system	HR Management
2 Controller	Name Patria Plc Address Arkadiankatu 2 FI-00100 Helsinki, Finland Other contact information (e.g. telephone during office hours, email address) security@patriagroup.com
3 Data protection officer / contact person in matters relating to the filing system	Name Risk and Compliance Manager Anna Nousiainen Address Arkadiankatu 2 FI-00100 Helsinki, Finland Other contact information (e.g. email address, telephone during office hours) info@patriagroup.com security@patriagroup.com
4 Purpose of processing personal data, legal basis for processing and information on the source of the personal data	<p>The purpose of this personal data filing system is to process information in matters regarding Patria's personnel such as recruiting, administration of employment relation, insurance, travel, annual leave, absences, salary payment, compensation and benefits, trainings. personal development and capacities as well as estimations and performance reviews.</p> <p>The purpose of processing of citizenship data is to create and implement access management rules in Patria's systems in relation to handling export-controlled data, classified information, and Controlled Unclassified Information.</p> <p>The personal data filing system of Patria HR Management covers the following sub-processes:</p> <ul style="list-style-type: none"> • Administration of employment relation • Insurance • Salary payment • Travel • Trainings, personal development and capacities • Estimations and performance reviews • Assessment of aptitude <p>Legal basis and purposes for processing personal data, data collection:</p> <ul style="list-style-type: none"> • Administration of employment relation <p><u>Legal basis:</u> Processing is necessary for the performance of a contract to which the data subject is party and for compliance with legal obligations to which Patria is subject as employer. Basis of processing of employee citizenship data is legitimate interest pursued by the controller.</p> <p><u>Purpose for processing:</u> The purpose for processing is management of employment-related matters of Patria's personnel throughout the employment relationship from recruiting to retirement. The purpose covers recruiting and overall management and administration of personnel's employment relation matters e.g.</p>

29.2.2024

working hours monitoring, absences and other matters related to salary payments, annual leave, travel, employee benefits and insurances.

The purpose of processing of citizenship data is to create and implement access management rules in Patria's systems in relation to handling export-controlled data, classified information, and Controlled Unclassified Information.

Source of personal data: Data is collected from the registered person, from Controller's system and from third parties.

- **Personnel insurances**

Legal basis: Processing is necessary for the performance of a contract to which the data subject is party and for compliance with legal obligations to which Patria is subject as employer.

Purpose for processing: Administration of statutory, additional and travel-related insurances for the personnel working for Patria.

Source of personal data: Data is collected from the registered person and from Controller's system.

- **Salary payment**

Legal basis: Processing is necessary for the performance of a contract to which the data subject is party and for compliance with legal obligations to which Patria is subject as employer when salary information is given to authorities for taxation and other purposes.

Purpose for processing: Payment of salary to personnel working for Patria.

Source of personal data: Data is collected from the registered person, from Controller's system and from third parties.

- **Travel register**

Legal basis: Processing is necessary for the performance of a contract to which the data subject is party and for compliance with legal obligations to which Patria is subject as employer

Purpose for processing: Administration of business travel of personnel working for Patria.

Source of personal data: Data is collected from the registered person and from Controller's system.

- **Training and eligibility**

Legal basis: Processing is necessary for the performance of a contract to which the data subject is party.

Purpose for processing: Administration of trainings and eligibility of persons working for Patria. The register is used for keeping track of persons' qualifications. Also

	<p>organisation and invoice details related to trainings and statistics of working days for trainings are managed using the information in the register..</p> <p><u>Source of personal data:</u> Data is collected from the registered person, from Controller’s system and from third parties.</p> <ul style="list-style-type: none"> • Personal estimates and performance reviews register <p><u>Legal basis:</u> Processing is necessary for the performance of a contract to which the data subject is party</p> <p><u>Purpose for processing:</u> Mapping and review of capabilities, strengths development areas and potential of Patria employees in relation to organisation’s personnel solutions. Data in the register is also processed for managing employer’s obligations.</p> <p><u>Source of personal data:</u> Data is collected from the registered person, from Controller’s system and from third parties.</p> <ul style="list-style-type: none"> • Reward Fund register <p><u>Legal basis:</u> Processing is necessary for the performance of a contract to which the data subject is party</p> <p><u>Purpose for processing:</u> Enabling the administration, placement and payment of funds as rewards to participants in Patria reward fund.</p> <p><u>Source of personal data:</u> Data is collected from Controller’s system.</p> <ul style="list-style-type: none"> • Aptitude assessment register <p><u>Legal basis:</u> Consent</p> <p><u>Purpose for processing:</u> Enabling the assessment of internal and external candidates’ aptitude for the role in question.</p> <p><u>Source of personal data:</u> Data is collected from the registered person and from third parties.</p>
<p>5 Description of the categories of data subjects and categories of personal data</p>	<p>1. Administration of employment relation</p> <p><u>The data subjects are:</u> Patria employees and EXT and job-seekers in the Employee Onboarding process</p> <p><u>The following information is stored about data subjects:</u> Name, social security number, gender, citizenship, secondary and former citizenship, native preferred language, home address, consent for security clearance vetting, bank account number, photo for ID card, monthly/hourly salary, standard weekly hours, employment start date, salary payment type, salary, manager, position and title, business function employer company, cost center, primary working location, employee type, employment contract type, contract end date and basis for temporary contract, probation details, notice</p>

29.2.2024

period, applicable collective agreement, drug test Y/N, employee entrance health Y/N, personal security clearance Y/N

2. Personnel insurances

The data subjects are: Patria employees

The following information is stored about data subjects: Name, DOB, social security number, employment relations details, family members when the employee is on a foreign secondment

3. Salary payment

The data subjects are: Patria employees

The following information is stored about data subjects: Name, cost centre, manager, personnel group, employment relation details, basic personal information, salary information, basis for performance bonus, working time information, reward fund details, salary database, description of role, classification of role, number of subordinates, performance review, DOB, home address, title, organization, bank account, language, employee group, collection permits, payment restrictions, tax information, personnel group, absences, statutory reporting to authorities

4. Travel register

The data subjects are: Patria employees

The following information is stored about data subjects: Name, traveler profile information from the travel agency, passport information

5. Training and eligibility register:

The data subjects are; Patria employees

The following information is stored about data subjects: Name, course registrations and completions, diet, training wishes, examinations, work history, training needs, priorities, schedules (for courses and other measures)

6. Personal estimates and performance reviews register:

The data subjects are; Patria employees

The following information is stored about data subjects: Name, Patria-ID, personal performance bonus targets and realization, completed courses, past review, goals for upcoming review cycle, topical themes for performance review, link to personal learning plan, eligibility details, feedback on performance and development themes.

7. Reward Fund register:

The data subjects are; Patria employees

	<p><u>The following information is stored about data subjects:</u> Social security number, name, address, language, bank account, beginning and end date of employment relationship, working time, salary or calculated salaries</p> <p>8. Aptitude assessment register:</p> <p><u>The data subjects are;</u> Patria internal and external job-seekers</p> <p><u>The following information is stored about data subjects:</u> Name, email, outcome of self-assessment and aptitude tests</p>
<p>6 Legitimate interests of the controller or a third party</p>	<p>Legitimate interest of Data Controller is basis for processing of employee citizenship data. The purpose of processing is management of and adhering to access control rules in Patria systems regarding export controlled (e.g. ITAR or EAR licensed), classified and so-called “Controlled Unclassified Data”. The legitimate interest of Controller is making sure that export control and other requirements are followed and to handle nationality information of employees and EXTs’ regarding the nationalities that are excluded access to controlled data. Balance test is drafted and accessed to this Privacy Notice.</p>
<p>7 Recipients and disclosure of personal data</p>	<p>As a broad interpretation of Article 4(9) of the GDPR, the parties (processors/recipients of personal data) to which Patria as a controller transfers personal data for processing (for example, in the context of performing maintenance tasks via a technical interface) are listed below.</p> <p>Access to the personal data in this filing system will be granted to the system supplier (private-sector system supplier(s)) as necessary for investigating any technical hardware or software failure.</p> <p>In addition, personal data in the filing system can be disclosed as necessary:</p> <ol style="list-style-type: none"> 1) for executing orders issued by the authorities, to the authority requesting the data; 2) to the suppliers of information systems, tools and equipment required for various tasks and to the suppliers in charge of identity and access management; 3) to suppliers investigating security incidents or nonconformities; 4) with consent of the registered person to supplier of employee health services 5) to attorneys and law firms providing legal services; 6) courts.
<p>8</p>	<p>According to Article 45(1) of the GDPR, the transfer of personal data to a third country or an international organisation may take place where the Commission has</p>

<p>Transfer of personal data to a third country or an international organisation</p>	<p>decided that the third country, a territory or one or more specified sectors within that third country, or the international organisation in question ensures an adequate level of protection. Such a transfer does not require any specific authorisation.</p> <p>The personal data in Patria Plc's filing system may be transferred outside the EU/ETA on the following conditions:</p> <p>In accordance with Article 46 of the GDPR: Transfers (of personal data) subject to appropriate safeguards. <i>Data will not be disclosed outside the EU, European Economic Area or countries decided by the Commission to provide an adequate level of protection unless an adequate level of protection is ensured through contracts or otherwise as required by law.</i></p>
<p>9 Data retention period</p>	<p>Data collected for Patria's filing systems will only be stored for as long as and to the extent necessary in relation to the original and compatible purposes for which the personal data was collected.</p> <p>1. Administration of employment relation Personal data is deleted from the filing system for Employee Onboarding process in 11 years following the end of the persons' employment relationship. Data of persons who do not progress in the Onboarding process to signing an employment agreement is removed inside one (1) month from the decision of discontinuing the employee onboarding.</p> <p>2. Personnel insurances Retention times in personnel insurances register are based on applicable legislation and are 5 – 50 years from end of employment relationship or creation of document.</p> <p>3. Salary payment Retention times in salary payment register are based on applicable legislation and are 5 – 50 years from end of employment relationship or creation of document.</p> <p>4. Travel register Data is kept in travel register for the duration of employment relationship or as long as they are needed for the defined purposes. Also legal obligations of can require other storage times.</p> <p>5. Training and eligibility register Data is kept electronically in training and eligibility register for the duration of employment relationship or as long as they are needed for the defined purposes. Also legal obligations of can require other storage times.</p> <p>6. Personal estimates and performance reviews register Data is kept in personal estimates and performance reviews register for 3 years after the end of employment relationship.</p> <p>7. Reward Fund register Data is kept in processor Mandatum Life Services Oy's storage for the retention times on the basis of employment relationship. Phone call recordings are kept for 10 years. Data related to taxation, accounting and reporting obligations are kept for 6 years following the end of each fiscal year.</p>

	<p>8. Aptitude assessment register Data in aptitude assessment register is kept in processor’s application “Laura”’s storage for 730 days after the application is sent or latest updated. Data can be stored and processed in the system also after this in the case of the registered person being selected as employer in the Controller organisation.</p>																								
<p>10 Principles of data protection; description of technical and organisational security measures</p>	<p>Personal data will remain confidential. Patria Plc’s data network or server environment or the cloud services in which the filing systems are located are protected by firewalls and other the necessary technical measures. Organisational security measures are applied by way of limiting access to data to those persons working for data controller’s organization who have a role-based need and purpose to process the data.</p>																								
<p>11 Rights of the data subject</p>	<p>Data subjects have right of access to any personal data stored on them in the filing systems. According to the GDPR, the controller must reply to the data subject’s request to exercise their rights within one month of receipt of the request.</p> <p>All requests should be sent in writing to one of the following Patria offices. The data subject must prove their identity when requesting access or rectification.</p> <table border="1" data-bbox="478 1093 1474 1805"> <thead> <tr> <th>Country</th> <th>Patria premises</th> <th>Opening hours</th> </tr> </thead> <tbody> <tr> <td>Belgium</td> <td>Rue du Fond des Fourches 23, 4041 Herstal</td> <td>Requires appointment – contact security@patriagroup.com</td> </tr> <tr> <td>Estonia</td> <td>Betooni 6a, Tallinn</td> <td>Requires appointment – contact security@patriagroup.com</td> </tr> <tr> <td>Finland</td> <td>Arkadiankatu 2, Helsinki Autotehtaantie 6, Hämeenlinna Hatanpään valtatie 30, Tampere Lentokonetehtaantie 1, Halli</td> <td>Mon–Fri at 8-16</td> </tr> <tr> <td>Latvia</td> <td>Dunties 23A, 1005 Riga</td> <td>Requires appointment – contact security@patriagroup.com</td> </tr> <tr> <td>Spain</td> <td>Aeropuerto de Córdoba, Ctra. Nacional 437, Km 5,8 14005 Córdoba</td> <td>Requires appointment – contact security@patriagroup.com</td> </tr> <tr> <td>Sweden</td> <td>Helikoptervägen 1, Stockholm-Arlanda</td> <td>Requires appointment – contact security@patriagroup.com</td> </tr> <tr> <td>The Netherlands</td> <td>Hengelder 22, 6902 PA Zevenaar</td> <td>Requires appointment – contact security@patriagroup.com</td> </tr> </tbody> </table> <p>A. Right of access to personal data</p> <p>Data subjects have right of access to any personal data stored on them in Patria’s personal data filing system.</p>	Country	Patria premises	Opening hours	Belgium	Rue du Fond des Fourches 23, 4041 Herstal	Requires appointment – contact security@patriagroup.com	Estonia	Betooni 6a, Tallinn	Requires appointment – contact security@patriagroup.com	Finland	Arkadiankatu 2, Helsinki Autotehtaantie 6, Hämeenlinna Hatanpään valtatie 30, Tampere Lentokonetehtaantie 1, Halli	Mon–Fri at 8-16	Latvia	Dunties 23A, 1005 Riga	Requires appointment – contact security@patriagroup.com	Spain	Aeropuerto de Córdoba, Ctra. Nacional 437, Km 5,8 14005 Córdoba	Requires appointment – contact security@patriagroup.com	Sweden	Helikoptervägen 1, Stockholm-Arlanda	Requires appointment – contact security@patriagroup.com	The Netherlands	Hengelder 22, 6902 PA Zevenaar	Requires appointment – contact security@patriagroup.com
Country	Patria premises	Opening hours																							
Belgium	Rue du Fond des Fourches 23, 4041 Herstal	Requires appointment – contact security@patriagroup.com																							
Estonia	Betooni 6a, Tallinn	Requires appointment – contact security@patriagroup.com																							
Finland	Arkadiankatu 2, Helsinki Autotehtaantie 6, Hämeenlinna Hatanpään valtatie 30, Tampere Lentokonetehtaantie 1, Halli	Mon–Fri at 8-16																							
Latvia	Dunties 23A, 1005 Riga	Requires appointment – contact security@patriagroup.com																							
Spain	Aeropuerto de Córdoba, Ctra. Nacional 437, Km 5,8 14005 Córdoba	Requires appointment – contact security@patriagroup.com																							
Sweden	Helikoptervägen 1, Stockholm-Arlanda	Requires appointment – contact security@patriagroup.com																							
The Netherlands	Hengelder 22, 6902 PA Zevenaar	Requires appointment – contact security@patriagroup.com																							

	<p>B. Right to rectification and restriction of processing</p> <p>Data subjects have the right to require the controller to rectify inaccurate and incorrect personal data concerning them.</p> <p>Data subjects have the right to restrict processing by Patria as the controller of this filing system where one of the following applies:</p> <ul style="list-style-type: none"> - the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data; - the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of its use instead; - the controller no longer needs the personal data for the purposes of the processing, but it is required by the data subject for the establishment, exercise or defence of legal claims; - the data subject has objected to processing pursuant to Article 21(1) pending the verification whether the legitimate grounds of the controller override those of the data subject. <p>C. Right to erasure</p> <p>Data subjects have the right to have the personal data concerning them erased from filing system without undue delay where one of the following grounds applies:</p> <ul style="list-style-type: none"> - the personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed; - the data subject withdraws consent on which the processing is based and there is no other legal ground for the processing; - the data subject objects to the processing pursuant to Article 21(1) and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2); - the personal data has been unlawfully processed; - the personal data has to be erased to comply with a legal obligation in European Union or national law.
<p>12 Right to object</p>	<p>According to Article 21 of the GDPR, data subjects have the right to object, on grounds relating to their particular situation, to the processing of personal data concerning them which is based on Article 6(1)€ (processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller), including profiling based on those provisions. The controller may no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.</p>
<p>13 Data portability</p>	<p>Once the data subject has provided Patria with the personal data concerning them in a structured, commonly used and machine-readable format, they have the right to have that data transmitted to another controller when:</p>

	<p>a) the processing is based on the data subject's consent or on a contract between the controller and data subject; and</p> <p>b) the processing is carried out by automated means; and</p> <p>c) the transfer is technically feasible.</p>																
<p>14 Right to complain to the supervisory authority</p>	<p>Data subjects have the right to lodge a complaint with a supervisory authority if they consider that the processing of personal data concerning them infringes the applicable data protection regulations.</p> <table border="1" data-bbox="480 689 1473 1892"> <thead> <tr> <th data-bbox="480 689 715 719">Country</th> <th data-bbox="715 689 1473 719">Contact info</th> </tr> </thead> <tbody> <tr> <td data-bbox="480 719 715 936">Finland</td> <td data-bbox="715 719 1473 936"> The Office of the Data Protection Ombudsman Finland Visiting address: Lintulahdenkuja 4, 00530 Helsinki, Finland Postal address: P.O. Box 800, 00531 Helsinki, Finland Website: Telephone: + 358 29 566 6700 Email: tietosuoja@om.fi </td> </tr> <tr> <td data-bbox="480 936 715 1122">Estonia</td> <td data-bbox="715 936 1473 1122"> Estonian Data Protection Inspectorate Address: 39 Tatari St., 10134 Tallinn, Estonia Website: Telephone +372 627 4135 Email: info@aki.ee </td> </tr> <tr> <td data-bbox="480 1122 715 1308">Sweden</td> <td data-bbox="715 1122 1473 1308"> Integritetsskyddsmyndigheten Postal address Box 8114, 104 20 Stockholm, Sweden Website: Telephone: +46 8 657 61 00 Email: imy@imy.se </td> </tr> <tr> <td data-bbox="480 1308 715 1397">Belgium</td> <td data-bbox="715 1308 1473 1397"> Autorité de protection des données Website: https://www.autoriteprotectiondonnees.be/citoyen Email: dpo@apd-gba.be </td> </tr> <tr> <td data-bbox="480 1397 715 1554">Latvia</td> <td data-bbox="715 1397 1473 1554"> Datu valsts inspekcija Address: Elijas iela 17, Rīga, LV-1050, Latvia Website: https://www.dvi.gov.lv/lv Telephone: +371 67223131 Email: pasts@dvi.gov.lv </td> </tr> <tr> <td data-bbox="480 1554 715 1740">The Netherlands</td> <td data-bbox="715 1554 1473 1740"> Autoriteit Persoonsgegevens Address: Hoge Nieuwstraat 8, 2514 EL The Hague, The Netherlands (only by appointment) Website: https://autoriteitpersoonsgegevens.nl Telephone: +31 88 1805 250 </td> </tr> <tr> <td data-bbox="480 1740 715 1892">Spain</td> <td data-bbox="715 1740 1473 1892"> Agencia Española de Protección de Datos Address: C/ Jorge Juan, 6, 28001-Madrid, Spain Website: https://www.aepd.es/es Telephone: +34 900 293 183 Email: prensa@aepd.es </td> </tr> </tbody> </table>	Country	Contact info	Finland	The Office of the Data Protection Ombudsman Finland Visiting address: Lintulahdenkuja 4, 00530 Helsinki, Finland Postal address: P.O. Box 800, 00531 Helsinki, Finland Website: Telephone: + 358 29 566 6700 Email: tietosuoja@om.fi	Estonia	Estonian Data Protection Inspectorate Address: 39 Tatari St., 10134 Tallinn, Estonia Website: Telephone +372 627 4135 Email: info@aki.ee	Sweden	Integritetsskyddsmyndigheten Postal address Box 8114, 104 20 Stockholm, Sweden Website: Telephone: +46 8 657 61 00 Email: imy@imy.se	Belgium	Autorité de protection des données Website: https://www.autoriteprotectiondonnees.be/citoyen Email: dpo@apd-gba.be	Latvia	Datu valsts inspekcija Address: Elijas iela 17, Rīga, LV-1050, Latvia Website: https://www.dvi.gov.lv/lv Telephone: +371 67223131 Email: pasts@dvi.gov.lv	The Netherlands	Autoriteit Persoonsgegevens Address: Hoge Nieuwstraat 8, 2514 EL The Hague, The Netherlands (only by appointment) Website: https://autoriteitpersoonsgegevens.nl Telephone: +31 88 1805 250	Spain	Agencia Española de Protección de Datos Address: C/ Jorge Juan, 6, 28001-Madrid, Spain Website: https://www.aepd.es/es Telephone: +34 900 293 183 Email: prensa@aepd.es
Country	Contact info																
Finland	The Office of the Data Protection Ombudsman Finland Visiting address: Lintulahdenkuja 4, 00530 Helsinki, Finland Postal address: P.O. Box 800, 00531 Helsinki, Finland Website: Telephone: + 358 29 566 6700 Email: tietosuoja@om.fi																
Estonia	Estonian Data Protection Inspectorate Address: 39 Tatari St., 10134 Tallinn, Estonia Website: Telephone +372 627 4135 Email: info@aki.ee																
Sweden	Integritetsskyddsmyndigheten Postal address Box 8114, 104 20 Stockholm, Sweden Website: Telephone: +46 8 657 61 00 Email: imy@imy.se																
Belgium	Autorité de protection des données Website: https://www.autoriteprotectiondonnees.be/citoyen Email: dpo@apd-gba.be																
Latvia	Datu valsts inspekcija Address: Elijas iela 17, Rīga, LV-1050, Latvia Website: https://www.dvi.gov.lv/lv Telephone: +371 67223131 Email: pasts@dvi.gov.lv																
The Netherlands	Autoriteit Persoonsgegevens Address: Hoge Nieuwstraat 8, 2514 EL The Hague, The Netherlands (only by appointment) Website: https://autoriteitpersoonsgegevens.nl Telephone: +31 88 1805 250																
Spain	Agencia Española de Protección de Datos Address: C/ Jorge Juan, 6, 28001-Madrid, Spain Website: https://www.aepd.es/es Telephone: +34 900 293 183 Email: prensa@aepd.es																
<p>15 Automated decision-making and profiling</p>	<p>The personal data in the filing system will not be used for automated decision-making or profiling.</p>																



PRIVACY NOTICE

EU General Data Protection Regulation (GDPR)
(679/2016), Articles 12–14 and Data Protection Act
(1050/2018)

29.2.2024

16 Additional information	Patria Group reserves the right to update this Privacy Notice.
17 Updates	The document was last updated on 29.2.2024
18 Appendices	Balancing test is carried out on 29.9.2023