

## Privacy Notice for Whistleblowing

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### **1 Privacy Notice for Whistleblowing**

#### **1.1 Protection of personal data when making a report**

Whistleblowing reports are likely to include personal data. Saab is protecting personal data in accordance with applicable laws and the relevant contractual confidentiality obligations towards its employees and external parties. The Saab company receiving a report, is the “Data Controller” for personal data included in that report.

The below information is presented for the benefit of anyone who has made a report or who is the subject of a report that is made through a Saab Whistleblowing channel.

#### **1.2 What types of personal data are processed?**

The Saab whistleblowing channel that you use may capture the following personal data and information: (i) your name and contact details (unless you report anonymously) and whether you are employed by Saab; (ii) the name and other personal data of the persons that you identify in your report if you provide such information; and (iii) a description of the alleged misconduct as well as a description of the circumstances of the incident.

Sensitive personal data, such as information relating to an individual’s racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic or biometric data, health, sex life or sexual orientation may not be submitted unless essential for the reported issue, and will be erased unless legal to process and deemed absolutely necessary for the investigation.

### **1.3 What is the legal basis for processing personal data**

Saab processes your personal data to fulfil its obligations under the EU Whistleblowing Directive 2019/1937 and member state legislation implementing the directive.

### **1.4 Who gets access to the personal data processed?**

Access to the personal data in a report is strictly restricted to:

- the relevant Saab whistleblowing investigation team
- the Ethics and Compliance Board
- HR representatives and managers involved in any disciplinary measures following the conclusion of the investigation.

The person who is subject of a report will be informed of the report (but not the identity of the reporter) in order for that person to be able to meet the allegations. If it is not possible to inform the individual immediately, for example if such information could jeopardize the investigation, information will be provided at a point of time where it would no longer constitute a risk to the investigation.

For the Saab Group Whistleblowing Hotline, the independent service provider Navex Global is acting as a “Data Processor” to Saab and may only process personal data on Saab’s instructions. Saab has entered into a written agreement with Navex Global for the protection of personal data processed within the Saab Group Whistleblowing Hotline.

The agreement details the technical and operational requirements that Navex Global must adhere to. Any subcontractors used by Navex Global are listed at <https://www.navex.com/en-us/service-hosting-providers/>. Any transfer of personal data is being made in accordance with written agreements that contain provisions for correct and adequate protection of personal data.

Personal data may also be transferred to law enforcement authorities if it is decided that a matter should be reported externally.

### **1.5 For how long is the personal data kept?**

Personal data which is manifestly not relevant for the investigation is deleted or anonymized when the report is processed. All personal data shall be deleted or anonymized within two years from closure of the matter.

## 1.6 What are your rights?

If your personal data are incorrect or need to be updated, you may at any time request that corrections are made by contacting Saab's Data Protection Officer ("DPO"). You may also contact the DPO if you no longer would like your personal data to be processed, if you would prefer Saab to restrict the processing in any manner, or if you want your personal data to be erased. In addition, you may receive a copy of the personal data relating to you and information regarding Saab's processing of such personal data by applying to the DPO. In such case, Saab will provide your personal data to you in a commonly used data format.

If you have any queries regarding the processing of your personal data or wish to exercise any of the rights stated above, please make a [personal data request](#) at the data privacy section on Saab's external website or contact the DPO at [dpo@saabgroup.com](mailto:dpo@saabgroup.com).

You have the right to lodge a complaint regarding how Saab processes your personal data to the relevant data protection authority or similar body within your jurisdiction.

## 1.7 How can you contact the Data Controller and exercise your rights?

### If the Data Controller is Saab AB

Please contact Saab AB, org. nr. SE 556036-0793, 581 88 Linköping, Sweden with central telephone number + 46 13-18 00 00.

### If the Data Controller is another Saab company

In this case you can find contact information to the relevant Data Controller on [Saab's external web](#).

The Data Controller is responsible for processing your personal data correctly and in accordance with applicable privacy laws.

Saab's DPO can be contacted at the above stated email address if you are uncertain of who the Data Controller is.