

Privacy Notice

CITYCON GROUP'S WHISTLEBLOWING CHANNEL

Citycon Oyj and its subsidiaries and other affiliates (later referred to as “**Citycon**”) respect the privacy of Cityconners and Citycon’s investors, customers, suppliers and other stakeholders. This privacy notice (later referred to as “Privacy Notice”) describes how Citycon collects and processes personal data in connection with the Whistleblowing channel and how Citycon ensures the privacy and security of information collected and processed by it.

In this Privacy Notice “personal data” means any information that can identify you as an individual either submitted by you and/or obtained through alternative channels.

Data Controller

In respect of each data subject’s personal data, the data controller is regarded to be the Citycon group company which has a contractual relationship or other co-operation relationship with the data subject or with the organization the data subject is representing. The data controller may, thus, be either Citycon Oyj or any of its subsidiaries or other affiliates.

Contact details

Citycon Oyj, business ID 0699505-3
Piispansilta 9 A, 02230 Espoo, Finland
tel. 020 766 4400
privacy@citycon.com

Purposes and legal basis for processing

Citycon’s Whistleblowing channel is a web-based grievance system for Citycon. It provides an opportunity to the employees, customers, suppliers and other stakeholders to report suspicions of violations; anything that is not in line with Citycon’s Code of Conduct principles and values, any other Citycon policies or any laws or regulations. Report may be processed and recorded in following categories:

- Non-compliance with laws and regulations
- Unfair competition
- Health and safety issues
- Discrimination or unequal opportunities
- Bullying or harassment
- Breach of data protection and security
- Environmental issues
- Corruption and bribery
- Money laundering
- Fraud
- Personnel issues
- Conflict of interest
- Other matters

The system enables reporting either by the whistleblower by name, or anonymously if allowed by local laws and regulations. Citycon’s Whistleblowing channel can be accessed by visiting the website: <https://report.whistleb.com/citycon>.

Personal data related to the channel is processed for the purposes of investigating and resolving the suspected violation. The processing is conducted as (i) processing is necessary for Citycon to comply with its legal obligations; and (ii) processing is necessary to fulfil the

legitimate interests of Citycon.

Categories of personal data we collect

Information collected and processed related to the channel will be limited to the minimum necessary and will contain data such as:

- Contact information
- Date of the report and reporting category
- Description of the alleged misconduct or violation
- Actions taken during the investigation
- Outcome of the investigation and the possible disciplinary and/or corrective actions

Where we collect the personal data from

Information will be collected from the person reporting the suspected violation by using the channel or via other means and from persons (internally and/or externally) involved in the investigation of the suspected violation.

Information can be also collected from Citycon's internal systems, as applicable.

Disclosure of personal data and categories of recipients of the data

All reports made will be forwarded to the chairman of Citycon board of directors' audit and governance committee, who will coordinate the channel and together with the Head of Legal support the respective business segment and/or function in the investigation of the suspected violations.

The channel is operated by an external service provider, WhistleB, Whistleblowing Centre AB. Citycon has contractually ensured that WhistleB, as a data processor, processes personal data in accordance with the applicable laws and regulations. In addition, Citycon may use other service providers (such as audit firms, law firms, external investigators) to assess the need for investigation and to conduct and/or assist with the investigation.

Information may be also disclosed to the external parties, such as to the competent authorities in accordance with the applicable laws and regulations or if required for the purposes of the investigation.

Transfer of personal data outside EU/EEA

Since some of Citycon's service providers may be located outside the EU/EEA, personal data can be transferred outside the EU/EEA.

When personal data is transferred outside the EU/EEA to a country, which does not guarantee adequate level of data protection, we will use appropriate safeguards, such as EU Commission's standard contractual clauses in accordance with applicable data privacy laws and regulations.

Do we conduct profiling?

We do not use your personal data for profiling.

Do I have to provide this data?

Data subjects may voluntarily use Citycon's Whistleblowing channel if they are willing to make a report about any suspected violation.

Retention time

Personal data related to the channel will be retained as long as the data is necessary for Citycon's genuine needs and legal and regulatory requirements Citycon is subject to.

Data protection

Citycon has taken appropriate technical and organizational measures to restrict access to the personal data it holds and to protect it against loss, accidental destruction, misuse, and unlawful alteration. Access to personal data is restricted on a need-to-know basis to individuals (Citycon's employees and service providers) who need to access the data for the purposes it was collected for.

What are your rights

Right to object:

- You have the right based on your situation to object to profiling and other processing in situations where we process your personal data based on our legitimate interests. These situations can relate to, for example, sending a newsletter or invitation to our events that we assume you are interested in, for example, based on your company's field of operation.

Direct marketing:

- You have the right at any time to object direct marketing free of charge. You may do this by contacting Citycon.

Right of access to data:

- You are entitled to have information concerning your personal data that is processed as well as a copy of such data.

Right to request rectification, erasure or restriction of processing of personal data:

- You have the right to request that we rectify erroneous data on you. You can also request that we erase certain data on you or request that processing be restricted on the grounds provided by law.

Right to withdraw consent:

- When processing is based on consent, for a consent to be valid, it needs to be withdrawable, and you have the right for such withdrawal at any time.

Right to data portability:

- To the extent that you have provided data to us that is processed based on your consent, you are entitled to obtain such data primarily in a machine-readable format and are entitled to transfer such data to another data controller.

Right to lodge a complaint with a supervisory authority:

- You are entitled to lodge a complaint with the competent supervisory authority if you are of the opinion that we have not complied with the data protection regulations applicable to our operations.

How you can contact us and exercise your rights

If you have any questions concerning protection of your personal data in our data processing activities or you wish to exercise your rights, please contact us at privacy@citycon.com.

Changes to Privacy Notice

We may update this Privacy Notice from time to time to reflect changes in our operations and/or applicable law. Any changes will be posted here.