

3101 Irving Avenue South Minneapolis, MN 55408, U.S. Phone: (612) 926.7988

Fax: (612) 926.4140 www.getintouch.com

DATA PROTECTION NOTICE

(Version dated 25 May 2018)

Please read this Data Protection Notice carefully before reporting your concern.

1. What is the Hotline/ Helpline?

This third-party hotline/helpline is operated by Management Communication Systems, Inc. (dba "IN TOUCH"), 3101 Irving Avenue South, Minneapolis, MN 55416, USA. IN TOUCH operates the hotline/helpline webpages you may use to report a concern and partners with Rackspace to protect and store all reports.

The use of this hotline/ helpline is voluntary. Please note, your report can only be received and processed if you acknowledge read and consent to this Data Protection Notice. If you do not wish to consent to it, then you should contact a manager, Compliance, Legal, Human Resources, or a member of your organization's leadership team. You may file your report anonymously, unless due to local countries regulation that prevents anonymous reporting through the hotline/ helplines. In these countries, you may still report your concern but will be required to provide your name and contact information.

2. What information may be collected about you?

When you use this hotline/helpline, your organization and IN TOUCH may receive, process and retain your personal information that you choose to provide, via web or telephone-based report intake system. This information may include information you want to provide when making your report, for example, you may decide to provide:

- · Your name, email address, office address, telephone number, location, department/organization and job title.
- Other information that you choose to provide when making your reports, such as any description of an incident or alleged misconduct.

3. Who will have access to your personal information?

For the purpose of processing your report, the personal data and information may be accessed, processed and used by relevant personnel of the organization responsible for managing the report, including human resources, internal auditing, legal, security or management and external advisors (e.g., legal advisors), and by technical staff at IN TOUCH.

Personal data and information may also be disclosed to the police, other enforcement or regulatory authorities and otherwise if required by applicable law. Please note that any person that you report via this hotline/ helpline will be notified at an appropriate time that a report has been filed. Your identity will not be disclosed. However, any person that you report is entitled to correct your description of the relevant circumstances giving rise to your report.

4. How will your personal information be used?

- IN TOUCH will collect and retain any personal information you provide in any report on behalf of your organization and will provide this information to your organization as part of any report that you make.
- IN TOUCH may also use any personal information you provide in any report to administer the hotline/helpline on behalf of your organization and to generate statistical data for your organization.
- The organization responsible for managing the report will use and retain any personal information you provide in any report to assess any incident, concern, or allegation that you report, to determine if any investigation is required, to investigate the matter reported where appropriate, and for internal reporting purposes.
- The organization responsible for managing the report may also use any personal information you provide if requested by law enforcement agencies and other government or regulatory authorities, to comply with legal needs such as; applicable laws, regulations, any subpoena or court order.

Please be aware that any information you supply about yourself and others, and any aspects of your organization operations, may result in decisions that affect you or others. When using this hotline/helpline, you should only provide information that is correct and factual as far as you know, at the time you may your report.

5. How long will my personal information be retained for?

The personal data you provided will be kept if it is necessary to process your report (including any investigations by the competent department), or, if

applicable, if they are necessary to initiate sanctions or if the data needs to be kept for legal reasons.

6. How can I access my personal information?

You have a right to request a copy of the personal information that the organization responsible for managing the hotline/helpline program holds about you. If you would like a copy of some or all your personal information, please send an email to info@getintouch.com.

7. IN TOUCH Privacy Policy

For additional information regarding IN TOUCH's Privacy Policy go to https://getintouch.com/privacy-policy/

IN TOUCH PRIVACY POLICY NOTICE

Privacy Statement Notice

This privacy notice discloses the privacy practices for IN TOUCH and IN TOUCH websites, services and products that collect data and display these terms. It does not apply to any IN TOUCH site, service or product that does not post or link to this statement or that contains this privacy statement.

This privacy statement will notify you of the following:

- What personally identifiable information is collected from you through the website, how it is used and with whom it may be shared.
- What choices are available to you regarding the use of your data.
- The security procedures in place to protect the misuse of your information.
- How you can correct any inaccuracies in the information.

Information Collection, Use, and Sharing

We are the sole owners of the information collected on this site. We only have access to/collect information that you voluntarily give us via email or other direct contact from you. We will not sell or rent this information to anyone.

We will use your information to respond to you, regarding the reason you contacted us. We will not share your information with any third party outside of our organization, other than as necessary to fulfill your request.

The Types of Information Collected

- **Contact details** E.g., name, company name, postal address, email address, job title, and telephone number.
- Hotline/Helpline Reporters No directly identifying information is automatically collected from reporters using IN TOUCH applications. Certain directly identifying information, such as name and e-mail address, is stored only when a reporter voluntarily gives this information for use by a client company. Information, such as IP addresses or Caller ID details are never collected. To check on the status of a report, you will be required to provide us with specific information (your automatically generated confirmation code and the password you created). This information allows us to verify your identity before allowing you to access the report details.
- Images, Devices and Social Media

- Photographs, videos, comments, and other content you submit to us:
- Information you provide by interacting with us through social media;

Your Access to and Control Over Information

You may opt out of any future contacts from us at any time. Or do any of the following at any time by contacting us by email at info@getintouch.com:

- See what data we have about you if any.
- Change/correct any data we have about you.
- Have us delete any data we have about you.
- Express any concern you have about our use of your data.

Security

We take precautions to protect your information. When you submit sensitive information via the website, your information is protected both online and offline.

Wherever we collect sensitive information, that information is encrypted and securely transmitted to us. You can verify this by looking for a lock icon in the address bar and looking for "https" at the beginning of the address of the Web page.

Updates to Our Privacy Statement

This Privacy Statement may be updated periodically and without prior notice to you to reflect changes in our personal information practices. We will post a prominent notice on our Site to notify you of any significant changes to our Privacy Statement and indicate at the when it was most recently updated. We encourage you to periodically review this page for the latest information on our privacy practices.

How to Contact Us

If you have any questions or comments about this Privacy Statement, would like a copy of our full Privacy Policy or if you would like us to update information we have about you or your preferences, please contact us by email at info@getintouch.com.