

ETHICSPPOINT PERSONAL DATA PRIVACY STATEMENT

1. Introduction

This Personal Data Privacy Statement (the “**Statement**”) regulates the terms and conditions for processing and protecting personal data for the purpose of the whistleblowing system, EthicsPoint (the “**EthicsPoint**”), provided by Electrolux Professional AB, reg. No. 556003-0354, with its registered address at Franzegatan 6, 112 17 Stockholm, Sweden (“**Electrolux Professional**” or the “**Company**”).

The EthicsPoint has been developed as a mechanism to report certain violations allegedly committed by the Company or its employees, contractors, subcontractors and suppliers, shareholders etc. (“**Whistleblower/s**”).

The Statement provides information on:

- The personal details and roles of the controller, the processor, steering and coordination groups;
- The categories of personal data being collected and the means to collect such data;
- The purpose and grounds for processing personal data;
- The procedure for filing complaints;
- The disclosure, transfer and storage of personal data;
- The rights of the data subjects.

2. Data Controller, Data Processor, Steering and Coordination Groups

2.1 Data Controller

Electrolux Professional acts as data controller within the meaning of Regulation 2016/679 dated 27 April 2016 on the protection of natural persons with regard to processing personal data and on the free movement of such data (General Data Protection Regulation) (the “**Regulation**”) for the processing of personal data in relation to the EthicsPoint.

Other companies within the Electrolux Professional Group may act as data controllers of personal data related to their employees, contractors, subcontractors and suppliers, shareholders etc. collected through the EthicsPoint. Where required under applicable law, the processing of personal data is notified to or authorized by the competent data protection authorities.

2.2 Data Processor

The EthicsPoint is operated by the company, described under Annex 1 to this Statement, acting on behalf of Electrolux Professional as data processor within the meaning of the Regulation (“**Data Processor**”). For this purpose, Electrolux Professional has, for itself and on behalf of the Electrolux Professional group companies, entered into a processing agreement with the Data Processor.

The database in which the personal data and information that you may report is stored, are operated in the EU by Cyxtera Germany GmbH (hosting colocation provider/no access to data/not a sub-processor) and Cyxtera Netherlands B.V. (back-up colocation provider for disaster recovery/no access to data/not a sub-processor)

2.3 Steering and Coordination Groups

The EthicsPoint Steering Group (the “**Steering Group**”) has been established primarily for the purpose of overseeing and evaluating the effectiveness of the EthicsPoint. The responsibility of the Steering Group is one of oversight.

. The Code of Conduct Steering Group (the “**Steering Group**”) is cross-functional and consists of Head of HR, Head of Legal and Head of Group Internal Audit.

A designated coordinator appointed by the Head of HR (the “System Administrator”), is responsible for managing and administering the EthicsPoint on a day-to-day basis and for forwarding reports for adequate handling as needed.

3. Personal Data

3.1 Collection of Personal Data

Electrolux Professional collects personal data through the EthicsPoint via online-report (through the website <http://electroluxprofessional.ethicspoint.com>).

3.2 Categories of personal data

If you report an incident to the EthicsPoint, Electrolux Professional collects the following personal data and information:

- your name and contact details (unless you wish to remain anonymous);
- the name/s and other relevant personal data of the person/s you name in your report, when you provide such information (e.g. description of functions, contact details); and
- a description of the misconduct as well as a description of the circumstances of the incident, including the time and place of the incident, the affected Electrolux organization, whether management has knowledge of the incident, and any questions you may have;
- the information obtained during the investigation, the results of the investigation and the actions that will be taken following the investigation.

4. Purpose and Grounds of Processing

Electrolux Professional will process personal data only for the purpose of reporting complaints and/or alleged violations of laws, regulations or company policies.

The legal grounds for processing are:

- The consent of the data subjects under the meaning of art. 6, para. 1, letter “a” of the Regulation for the personal data of reporting data subjects, who do not file an anonymous report; and
- The legitimate interests of the Controller under the meaning of art. 6, para. 1, letter “f” of the Regulation for the personal data of the reported persons.

5. Procedure

5.1 Reporting through the EthicsPoint

Reporting suspected misconduct through the EthicsPoint by using the option provided under Item 4 above:

A report may be submitted openly (which requires the provision of your personal data as a reporting person) or anonymously. Please note, however, that Electrolux Professional is able to receive and process reports after you have acknowledged this Statement and given your consent to the processing of the reports, as described here. If you do not consent to the processing of the reports as described here, the system will not allow you to file a report.

The report will initially be routed to NAVEX, the Data Processor, which is a third-party vendor which operates the EthicsPoint on behalf of the Company and reported to the designated coordinator. The report will thereafter be made available to designated officers at the Company.

The designated officers will evaluate your report and potentially conduct a preliminary investigation followed, if necessary, by further investigations. Internal Electrolux Professional resources or external

specialists will be engaged in the investigation, as required. The EthicsPoint is overseen by the Steering Group.

5.2 Information related to you as a reporting person

When you file a report through the EthicsPoint, the following procedures will apply:

- information in relation to the report, including your identity, will only be provided to those persons within the Company who have a need to know such information to execute tasks under or in relation to this Policy, to perform the investigation and any actions as a consequence of the report,
- information in relation to the report will be provided in such a manner as to safeguard to the fullest extent possible the confidentiality of your identity as a reporting person;
- your identity will not be disclosed (in particular not to any reported person), unless it is necessary for the investigation of the complaint or alleged violation or subsequent legal proceedings, if it is required by applicable law or an important public interest, if it is required for court proceedings or if the report has been submitted in bad faith.
- the Data Processor will provide you with means to enable you to check the status of the complaint or violation you reported.

5.3 Informing the reported person/s

Electrolux Professional, reserves the right to notify the reported person about the report, as practicable or when legally required, unless there is substantial risk that notification of the reported person would jeopardize the Company's ability to effectively investigate the complaint or alleged violation or gather the necessary evidence.

The person designated as responsible by the Steering Group will in any event assess the possibility to inform the reported person. This evaluation will take into account other measures that can take away the objections against informing the reported person immediately, including, but not limited to, technical and organizational measures that can be taken to prevent the destruction of evidence.

After the reported persons have been informed of the report, they will be interviewed to enable them to give their view on the facts on which the report is based.

After the investigation has been concluded, the Company will determine what actions will be taken. Once such decision is made, the reported person will be informed whether any action will be taken as a consequence of the report and what that action will be.

6. Disclosure, Transfer and Storage of Personal Data

6.1 Disclosure

For the purpose of processing your report, the personal data and information may be accessed, processed and used by the relevant personnel from the EthicsPoint organization, including human resources, internal auditing, legal, security or management and external advisors (e.g. legal advisors), and by technical staff of the Data Processor.

Personal data and information may also be disclosed to the police and/or other enforcement or regulatory authorities and otherwise if required by applicable law.

6.2 Transfers of Personal Data

The personal data processed by the Data Processor may be transferred to, or directly accessed from the United States, depending on the option for reporting. For this purpose, the Data Processor and Electrolux Professional entered into a data processing agreement which includes the Standard Contractual Clauses

issued by the European Commission. These Standard Contractual Clauses provide for adequate safeguards for the protection of personal data and provide a valid legal basis for the transfers of personal data to the Data Processor in the United States. Further detail about the certification of the Data Processor is provided under Annex 1 below.

If it is necessary to disclose personal data to a person or legal entity in a country outside the EEA, the controller or the processor in this country shall comply with the provisions of the Regulation for transfers of personal data to third countries or international organizations.

6.3 Storage

The Company and the Data Processor will take the necessary technical and organizational measures to adequately safeguard the personal data against loss or unauthorized access. Such measures will include authentication processes and other means necessary to protect your identity as the reporting person, passwords and personal identifiers and logging access to data. All persons participating in the investigation and handling of the report will be bound by specific reinforced security and confidentiality obligations. The personal data may be collected by any data processing means, whether electronic or not, for the sole purpose of being used in relation to the EthicsPoint, i.e. the personal data will in all cases be processed separately from other employee information systems or employee files.

The Data Processor does not generate or maintain internal connection logs containing Internet Protocol (IP) addresses, so no information linking your computer to the Data Processor would be available. Reports from your computer would come through a secure Internet portal which does not trace or show user screen names. The Data Processor removes Internet addresses to ensure that anonymity in the Data Processor's system is maintained. The Data Processor will not use information reported to it for any purpose other than passing the information to designated officers in Electrolux Professional for appropriate handling.

The personal data you provided will be kept as long as they are necessary to process your report (including any investigations by the competent department), or, if applicable, as long as they are necessary to initiate sanctions or if the data needs to be kept for legal reasons.

Personal data relating to reports that have been found unsubstantiated or concern an incident or a complaint outside the scope of the EthicsPoint will be removed.

Personal data relating to reports will be removed within two (2) months after the verification work is completed, unless disciplinary action is taken or court proceedings are filed against the reported person or if a report was filed in bad faith, in which cases the data will be removed within two (2) months after the disciplinary action, where applicable, or any court proceedings, including any appeal, have been completed against the reporting individual.

Personal data will be removed by destruction or adaptation in such a way that it will no longer be possible to identify you or the reported person.

7. Rights of the Data Subjects

7.1 Your rights as a reporting person

Filing reports through the EthicsPoint is voluntary.

Electrolux Professional strictly forbids any retaliation against any person who makes a report or any other negative consequences for persons reporting incidents in good faith.

Reporting anonymously

You may remain anonymous if you wish, although handling the case would be easier if you identify yourself, since this will allow us to ask for clarifications and further details where needed. However, it should be noted that in some countries anonymous reporting may not be permitted and a report through the EthicsPoint may then only be submitted if the reporter states his/her name and contact details. It is your responsibility to verify whether you can report anonymously.

Sanctions

Any misuse of the EthicsPoint, including but not limited to the reporting of violations in bad faith, may result in disciplinary action (if you are an employee) or criminal/ civil proceedings against you.

The use of the EthicsPoint in good faith, even if the facts later turn out to be inaccurate or do not trigger any particular further action, will not expose you to sanctions and will not affect your position (if you are an employee or contractual partner) in any way.

7.2 Rights of the reported person

Any employee may, at any time, ask the person designated as responsible by the Company whether a complaint or violation has been reported about him/her. If so, the employee will be provided with a written overview of the personal data available about him/her unless this would:

- seriously hinder the investigation, in which case a written overview will be provided once the evidence has been protected, or
- compromise your interests as a reporting person or the rights and freedoms of others, in which case the written overview will only include personal data that does not compromise such interests or rights.

The written overview will not include the details of the person that submitted the report.

If the registered personal data provided proves to be incorrect or irrelevant, the reported person can request the correction or removal of such information. The reported person also has the right to object to the processing of personal data in relation to a report on compelling legitimate grounds relating to his or her particular situation, unless the legitimacy of the processing is based on a legal obligation.

The requests mentioned under this section will be answered as soon as reasonably practicable. A request from an employee about whether a complaint or violation has been reported about him or her will normally be answered within one (1) month (but in no event later than within four (4) months) following receipt, and a request for correction or removal will be answered within ten (10) days following receipt. Any refusal will be in writing and will mention the reasons for the refusal.

7.3 How to contact us

If you want to exercise your data subject rights or if you have any other questions concerning this Data Privacy Statement, please submit your request at the Group Privacy Officer.

For your information, the Privacy Officer contact details are:

Electrolux Professional AB

Group Privacy Office

Franzegatan 6

112 17 Stockholm, Sweden

privacy@electroluxprofessional.com

This Statement has no prejudice to any applicable law. Where the terms of this Statement, in comparison to the applicable law, provide for stronger or additional safeguards, rights or remedies to reporting or reported persons, the terms of this Statement will apply.

8. Adoption of and changes to the Statement

The Company may change this Statement from time to time without notice. The most current version of this Statement will always be available at the Company Intranet page.

Annex 1

Data Processor

Data Processor Details:

Cyxtera Germany GmbH (hosting colocation provider/no access to data/not a sub-processor), Frankfurt FRA2 Campus, Wilhelm-Fay-Strasse, 65936 Frankfurt am Main, Germany.

Cyxtera Netherlands B.V. (back-up colocation provider for disaster recovery/no access to data/not a sub-processor), Amsterdam AMS1 Campus, Linieweg 1, 1165 AA, Halfweg, NL.

Certification:

Navex is certified under the EU-U.S. and Swiss-U.S.
