

## PRIVACY NOTICE FOR AMER SPORTS GROUP NAVEX ETHICSPPOINT -REPORTING CHANNEL AMER SPORTS

### 1. YOUR INFORMATION AND PRIVACY

Amer Sports Oy and its affiliates/group companies (“Amer Sports” or “we”) are committed to protecting your privacy and complying with applicable data protection and privacy laws. This Privacy Notice (“Notice”) applies to all Amer Sports internal and external persons (collectively referred to as “you” or “your”), who report misconducts or non-compliance matters through the Amer Sports group NAVEX EthicsPoint -whistleblowing reporting channel (“Channel”). This Notice sets out which personal data Amer Sports collects and for which purposes the personal data is processed in connection with the Channel.

Amer Sports Oy is the main data controller of personal data processed in connection with the Channel. However, in some countries we have also established additional legal entity specific local reporting channels to the Channel. In these countries the local legal Amer Sports entity acts as a joint controller with Amer Sports Oy, and the local legal entity is the leading data controller for the local channel. In addition, the Channel is managed and provided by a third party service provider, wherefore also some of your personal data may be transferred to the service provider’s locations as well as within Amer Sports.

We may update this Notice at any time. If we change our approach to data protection, you will be informed of these changes or made aware that we have updated the Notice (e.g. by publishing the update on the web page through which the Channel can be accessed).

### 2. THE CONTROLLER OF YOUR PERSONAL DATA AND CONTACT DETAILS

The controllers responsible for the purposes of the applicable data protection and privacy laws are:

(1) Amer Sports Oy

Business-ID: 0131505-5

Siltasaarenkatu 8-10, 00530 Helsinki, Finland

Contact details: Amer Sports Group Data Protection Officer, [data.privacy\(at\)amersports.com](mailto:data.privacy(at)amersports.com)

AND for the any local reporting channels:

(2) The Amer Sports local legal entity (as identified in the local guidelines)

### 3. DATA SUBJECTS AND PERSONAL DATA PROCESSED

We process personal data only to the extent necessary for their specific processing purpose. The data subjects whose personal data is collected and further processed in connection with use of the Channel can be divided into two general categories: reporting persons and other data subjects (such as persons included in the investigation team(s) and persons whom a report concerns).

We may process the following personal data when you make a non-anonymous report via the Channel:

#### **Personal details**

- Names
- Contact details (email, phone)

- Company name
- Title
- Date and place of birth
- Address

**Other**

- Descriptions of alleged, suspected or detected misconduct or non-compliance
- Other personal details or information disclosed on a report or in connection with the investigation of the report.

#### 4. PURPOSES AND LEGAL BASIS OF PROCESSING

Persons can make reports via the Channel (or any local reporting channel) anonymously. Providing personal data is not a requirement for a person to make a report, but investigating certain types of allegations may require collecting some personal data to identify the correct persons.

We process your personal data under this Notice when you submit a non-anonymous report via the Channel. This personal data is then processed in order to manage, investigate, resolve, defend and document reports made via the Channel. The personal data is processed on the basis of management and fulfillment of Amer Sports' binding legal obligations in providing ethics and compliance reporting mechanisms and ensuring compliance with the related national and EU laws and policies, or on Amer Sports' legitimate interest in investigating suspected violations of for example our Code of Conduct where and to the extent these investigations of suspected violations are outside the immediate scope of Amer Sports' legal obligation to investigate.

#### 5. SOURCES OF PERSONAL DATA COLLECTED

We collect your personal data directly from you when you make a non-anonymous report through Channel (or through local reporting channels). We may also receive your personal data from someone else making a non-anonymous report concerning you.

#### 6. TRANSFERS AND DISCLOSURES OF YOUR PERSONAL DATA

Amer Sports may need to disclose personal data processed to other companies within the Amer Sports group for the purposes described above. These recipients may be located in countries outside the EU/EEA. To ensure adequate protection of your personal data when transferred within the Amer Sports group, regardless to which country your personal data is transferred, we have entered into the Amer Sports intra-group data transfer agreement (IGDTA). The IGDTA obligates every Amer Sports group company to safeguard the personal data, inter alia, by including the European Commission's Standard Contractual Clauses ("SCC") in relation to the data transfer should the receiving company be located outside of EU/EEA.

We may also need to disclose some personal data or other information collected via the reports to external parties such as law enforcement authorities, supervisory authorities or external legal advisors, if and where necessary for the investigation and resolution of the reported matter.

As stated above, the Channel is operated by a third party, which means that if any personal data is disclosed through the reporting channel, they will be processed due to technical process by this third party service provider. If you use any other reporting channel offered by Amer Sports (or any Amer Sports Group company), these channels can be directly or indirectly be operated or supported by third party service providers. Amer Sports has entered into necessary data processing agreements with these third party service providers.

## 7. DATA SECURITY

We use a variety of technical and organizational security measures to secure your personal data in accordance with applicable laws and is committed to protecting the security of your personal data we process.

Such security measures include, where appropriate, the use of firewalls, secure server facilities, encryption, implementing proper access rights management systems and processes, careful selection of processors, sufficient training of Amer Sports' personnel involved in the processing as well as other necessary measures. Where appropriate, we may also take back-up copies and use other such means to prevent accidental damage or destruction of your personal data.

## 8. DATA RETENTION

Personal data included in a report will be deleted when no longer needed for investigation and enforcement purposes. Documentation from the investigation will be anonymized where possible; name and address must be removed together with any other information which directly or, in conjunction with other data, indirectly could identify the person.

## 9. YOUR RIGHTS

You have the following rights under applicable data privacy laws:

- You have the right to request information on and access to the personal data we have collected from and of you.
- You also have the right to request that we complete, rectify, or delete any incomplete, incorrect, unnecessary or outdated personal data we hold on you. However, we cannot delete such personal data that is necessary for compliance with binding legal obligations or if the personal data must be retained according to applicable laws.
- You have the right to request and receive the personal data we have collected on you for performance of a contract or with your consent in a commonly used and machine readable form.
- You may request restriction of processing of your personal data if you do not wish your personal data to be deleted, but the processing of your personal data has been deemed unlawful or the personal data is no longer necessary, or you have objected to the processing and the existence of legitimate grounds for processing is still under consideration.
- You may at any time object to your personal data being processed for direct marketing purposes, sending promotional materials, profiling, or for the performance of market research. Further, where your personal data is processed based on your consent, you have the right to withdraw your consent for such processing at any time.
- You always have the right to lodge complaints pertaining to the processing of your personal data to the competent data protection authority if so provided under applicable data privacy and protection laws.

If you want to use any of the rights mentioned above, you may do so by contacting us through the contact point referred in above in this Notice or messaging us via the Channel. If you have been using the local reporting channels, you should primarily contact the local Amer Sports whistleblowing team. When you contact us, please state the reason why you are contacting us (e.g. you wish to request a copy of your data, object to processing, update your data) and information that will help us to identify you.

We may also request additional information from you in order to properly identify you so we can fulfil your request.

