



# Privacy statement NN Whistleblower system

## **About this privacy statement**

This is the privacy statement of NN Group N.V. ('NN'). The address of NN is Schenkkade 65, 2595 AS, The Hague, The Netherlands.

This privacy statement is applicable with regard to the processing of personal data of persons reporting a concern and/or breaches as defined in the NN Group Whistleblower Policy (paragraph 7.2), persons being accused, facilitators and/or witnesses. The NN Whistleblower Policy can be found here ([link](#)).

The purpose of this privacy statement is to be transparent about how NN collects, uses and protects personal data in compliance with applicable data protection legislation, such as the General Data Protection Regulation ('GDPR').

## **Personal data processed**

Personal data is data that tells something about a natural person or that we can connect with a natural person. Personal data in relation to the reporter (for example current and former employees, shareholders or suppliers), persons being accused, facilitators and/or witnesses can be processed.

NN can collect and process name, contact details (such as e-mail address and (mobile) phone number) and function title as well as information in the context of the facts/accusations reported. Reports can be filed in writing or by means of a voice message. Such voice messages will be transcribed into text and subsequently deleted.

Additional personal data - such as information in relation to behavior - can be processed while conducting a preliminary investigation as well as in relation to (the monitoring of) follow-up actions and/or measures to address the issue(s) reported or in case of criminal/administrative investigations and/or enforcement or subsequent litigation.

## **Processing purposes and legal grounds for processing**

Personal data will be solely processed as far as necessary for the purpose of verifying and/or investigating a report filed by a reporter (in writing or orally) and follow up) actions and/or measures by NN - whether or not to enforce or defend the rights and/or interests of NN - in connection thereof as well as in relation to any possible criminal/administrative investigations and/or enforcement or subsequent litigation.

The legal grounds for processing personal data are article 6 paragraph 1 sub c GDPR (the fulfillment of a legal obligation) and article 6 paragraph 1 sub f GDPR (legitimate interest).



### **With whom may NN share personal data?**

NN can engage processors with regard to the processing of personal data, such as the provider of the Speak Up system (PeopleInTouch). These parties work under authority of NN.

NN enters into adequate data processing agreements with such parties.

Furthermore NN may be required by law to provide personal data to public authorities in the context of criminal/administrative investigations or enforcement as well as in light of possible legal proceedings.

### **Retention of personal data**

NN does not retain personal data any longer than strictly necessary. In principle personal data will be retained for a maximum period of 7 years after a report was received. In any case personal data will be deleted as soon as these are no longer necessary for the processing purposes mentioned.

### **Protection of personal data**

Personal data is handled with strict confidentiality and care. The identity of reporters will be protected in accordance with the NN Whistleblower Policy. NN has implemented appropriate technical and organizational measures to protect your data against unauthorized or unlawful access to, and/or disclosure, loss, destruction or alteration of personal data. Only a limited number of authorized NN employees (can) have access to personal data in this regard insofar as this is necessary for the performance of their duties in the context of handling reports filed in the Speak Up system. All employees have signed a non-disclosure agreement and have taken an oath.

### **Data transfer outside European Economic Area**

Your personal data is generally processed within the European Economic Area ('EEA'). In some cases however NN can use the services of parties in countries outside the EEA. Standard contractual clauses are then concluded and where necessary adequate measures are implemented to ensure that your personal data are also well protected in such cases.

### **Your rights**

As a data subject you have a number of rights with regard to your personal data.

These rights are explained below.



- Right of access: this means that you can ask which personal data NN has registered and how it is processed.
- Right of rectification, erasure and restriction: you have the right to have your personal data changed if it is incorrect. You also have the right to have your personal data deleted if these have been processed unlawfully, are no longer needed for the processing purposes established or because you have withdrawn your consent and NN no longer has any other valid reason to process your data. You are also entitled to restrict the processing of your personal data. This right means that you may ask NN to temporarily not use your data. You may exercise this right if your personal data is incorrect, unlawfully processed or if you object to the processing of your personal data and your objection is still being handled by NN.
- Right to data portability: this means that in certain cases you have the right to ask NN to transfer the personal data you provided to you and/or another party.
- Right to object: you may lodge an objection to the processing of your personal data if NN uses your personal data for purposes other than necessary for performing a contract or necessary for fulfilling a legal obligation. NN will carefully assess your objection and stop processing your personal data, if necessary.

You can exercise your rights by sending an e-mail to [whistleblower@nn-group.com](mailto:whistleblower@nn-group.com).

#### **Automated decision-making**

No automated decision-making is applied by NN in this context.

#### **Questions, comments and complaints**

For general questions/comments about this privacy statement, please contact NN Corporate Compliance ([whistleblower@nn-group.com](mailto:whistleblower@nn-group.com)). If you have a question or a complaint about the way NN handles your personal data, you can send an e-mail to the NN Group Data Protection Officer ([dpo-office@nn-group.com](mailto:dpo-office@nn-group.com)). You also have the right to submit a complaint to the Dutch Data Protection Authority (Autoriteit Persoonsgegevens).

This privacy statement can be adjusted due to changes in legislation and/or when NN changes the way it processes personal data. This version is dated 13 January 2023.