
Privacy Notice

Reporting & Internal Investigations

Updated March 25, 2024

This privacy notice explains how we collect, store, use, disclose, retain and transfer (hereinafter “process”) personal data in the context of reporting and internal investigations.

Who We Are

Hexagon AB, Swedish Company Registration Number 556190-4771, located at Lilla Bantorget 15, P.O. Box 3692, SE-103 59 Stockholm, Sweden, Hexagon AB, its subsidiaries and controlled joint ventures (hereinafter “Hexagon” or “we” or “us”) are the joint data controllers. This means we jointly decide on the methods and reasons for processing your personal data.

What Personal Data Do We Process?

We may collect and process personal data that is either actively provided to us, already in our possession, or automatically generated, falling within the following categories:

Personal Identification Information: Details such as name and employee ID.

Contact Details: Data like phone number, address, and email address.

Report Content: Information included in the report and any subsequent communication.

Investigation Data: Information gathered during internal investigations.

Automated Data: Information generated during report submission, including submission date, time, and unique user identifiers.

Purpose and Legal Basis for Processing

Personal data may be used for:

- The investigation of reports.
- Ensuring compliance with legal, regulatory, and policy requirements.
- Protecting Hexagon’s assets, employees, and stakeholders.

The legal bases for processing are:

- Consent.
- Compliance with a legal obligation.
- Our legitimate interests.

Data Sharing and Transfers

Your personal data may be shared with:

- Relevant Hexagon personnel involved in the case management on a need-to-know basis.
- Third parties, such as legal advisors, external investigators, or regulatory authorities, when required by law or necessary for the purposes of the investigation.
- Platform service providers that act as data processors on our behalf, strictly for the performance of services we have contracted them for.

We will not transfer your data to foreign jurisdictions unless such transfer is compliant with the applicable laws.

Security

To protect your personal data against accidental or unlawful destruction, loss, use, or alteration and against unauthorized disclosure or access, we use adequate physical, technical and organizational security measures.

Our Hexagon Ethics and Compliance Reporting System, a dedicated platform for reporting and case management, is operated by Lighthouse Services, LLC (“Lighthouse”). Lighthouse ensures the safe storage of personal data in encrypted, secure data centers. Access to the decrypted personal data is strictly limited to authorized personnel from Hexagon and Lighthouse only.

Retention Period

Personal data collected for the purposes of reporting and internal investigations will be retained for a period of 2 years from the date the report was resolved, unless a different retention period is warranted for legal compliance or to protect the legitimate interests of Hexagon and relevant stakeholders.

Your Rights

You are entitled to know what personal data we are processing about you. You have the right to request access to your personal data and you can request that we provide a copy of such data to you. You are entitled to have incorrect personal data regarding you corrected, and in some cases you may request that we delete your personal data. You also have the right to object to certain processing of your personal data, and request that the processing of your personal data be limited. Limitation or deletion of your personal data may result in Hexagon not being able to fulfil its commitments to you. Hexagon may not always be obliged to comply with a request from you for

deletion, restriction, or objection. Additional circumstances such as exercising the right of freedom of expression and information, compliance with a legal obligation or processing for establishment, exercise or defence of legal claims can justify further processing by Hexagon. Hexagon will assess the eligibility of your request and inform you about Hexagon's decision and reasoning. Where you have given us your consent to process your personal data, you can withdraw your consent at any time and without justification. Please note, that where you withdraw your consent, we might rely on other legal grounds, e.g., legal obligation for further processing your personal data.

You may exercise your rights by contacting us at privacy@hexagon.com.

In addition, you have the right to lodge a complaint with the relevant data protection supervisory authority, where the applicable laws provide for such a remedy, e.g., in the countries of the European Economic Area. The contact details of the data protection supervisory authorities within the European Economic Area are available [here](#).

For California Residents Only

The purpose of this section is to provide information to California residents pursuant to the California Consumer Protection Act (CCPA). Personal data also includes any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a household. We do not and will not sell your personal data to third parties.