

Implementation of whistleblowing mechanisms usually means personal data processing (i.e., collection, registration, recording, publishing and destruction of the data relating to an identified or identifiable person), which in turn means that implementation of data protection rules is required. Neither the Estonian Employment Contracts Act nor the Data Protection Act specifically regulates whistleblowing. Consequently, whistleblowing can be implemented in a company only in case the company has a clear obligation under another Estonian act (or a foreign contract or a directly applicable legislation of the Council of the European Union or of the Commission of the European Communities), compliance with which requires processing such data. In such case, the recommendations given by the Article 29 Data Protection Working Party of European data protection authorities should be followed:

http://ec.europa.eu/justice/policies/privacy/docs/wpdocs/2006/wp117_en.pdf