



## Privacy Policy

### Description of the personal data file

Description created on February 1, 2019

### PERSONAL DATA ACT (523/1999) SECTION 10 AND 24

#### UNOFFICIAL TRANSLATION

(Translation of the original document in the Finnish language. In case of discrepancy, the Finnish language version is prevailing)

### 1. Controller

#### ASPOCOMP GROUP PLC

Business ID: 1547801-5

Keilaranta 1, 02150 Espoo, FINLAND

Tel: +358 20 775 6860

### 2. The contact person

Aspocomp Group Plc

Ms. Marian Ärväs, Manager, Administration

Keilaranta 1, 02150 Espoo, Finland

Tel: +358 20 775 6860

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### 3. Name of the register

Registering for Aspocomp Group Plc's (hereinafter referred to as Aspocomp) Annual General Meeting to be held on April 3, 2019.

### 4. The purpose of processing the personal data / the purpose of the use of a register

The personal data of shareholders are processed for the purpose of collecting registrations for Aspocomp's Annual General Meeting, informing registrants, ascertaining a registrant's identity and that he/she has the right to participate in the Annual General Meeting, as well as for other purposes related to arranging the meeting. In addition, the register data is also processed for compiling and printing the list of participants, voting list and ballots and for arranging potential voting as well as for meeting the rights and obligations set out in the Companies Act and in Aspocomp's Articles of Association.

Any register data marked or annexed to the minutes of the Annual General Meeting will be stored as required by the Companies Act. The personal data collected shall be used only for preparing a list of participants, a list of votes, ballots and for organizing the potential polling. There shall also be a list

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of participants attached to the minutes of General Meeting including the names of the shareholders which participated in General Meeting, names of their proxies and number of shares and votes. Any other information stored in the register will be destroyed as soon as they are no longer needed for drawing up the minutes of the meeting or to verify the accuracy of the information therein.

The log data or any other information collected from the use of the register can be used when supervising the register technically, ensuring data security, as well as clearing misusages, faults and disorders. In addition, the data can be used for statistics and to analyze the use of the register, as well as to develop the register or its functions.

Aspocomp Group Plc may use subcontractor, for example Euroclear Finland Ltd and its electronic shareholder registration system, to technically implement and maintain, as well as to process the register data stored in the system.

## 5. Content of the register

The register data may consist of the following contents which are described below:

- Name, personal identity code, book-entry account number, address, telephone number, e-mail address
- Participant's status (e.g. a shareholder, agent)
- Number of shares and votes, voting information
- Information concerning the registration and participation of the Annual General Meeting, such as time and ways of registration, notified person and participant's possible disabilities or any other needs
- The log data accumulated by electronic registration or any other use of the register

## 6. Regular sources of information

The source of the information included in the register is the data subject himself/herself and Aspocomp's Shareholder Register, which may be maintained by Euroclear Finland Ltd.

## 7. Transfers of information to countries outside the European Union or the European Economic Area

The register data will not be disclosed or transferred to third parties, unless disclosure is required by the law or formalities of public authorities.

No transfers to countries outside the EU or the EEA.

## 8. Register protection and data retention period

The manual data contained in the register is located in locked and guarded premises. The electronic register and the information therein is stored on the controller's system, which is protected through the operating system's protection methods. Access to the system requires the use of a username and password. The system is also protected with a firewall and other technical measures. Only certain designated employees of Aspocomp have access to and the right to process the register data stored in the system.

Any register data marked or annexed to the minutes of the Annual General Meeting will be stored as required by the Companies Act. Any other information stored in the register will be destroyed as soon as they are no longer needed for drawing up the minutes of the meeting or to verify the accuracy of the information therein.

## 9. Right of inspection and rectification of incorrect data

The data subject has the right, pursuant to the law, to inspect the data relating him/her that is stored in the register. Anyone who wishes to inspect or correct the data relating to him/her, shall be submitted to this effect a request (incl. a request for erasure) in person, Aspocomp's head office, Keilaranta 1, 02150 Espoo, or to send a personally signed written request to the address above.

The data subject has also the right to demand corrections to incorrect data. A request for rectification shall specify the incorrect data and provide the corrected data. A request for rectification must be made in writing and to be sent signed to the controller to the address above.