



## Privacy Protection Notice for Personal Data of the shareholders register of Aspocomp Group Plc

This Privacy Protection Notice describes personal data processing related to Aspocomp Group Plc's Annual General Meeting 2021. Description created on February 18, 2021.

### 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** (hereinafter referred to as Aspocomp or company)

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

marian.arvas(at)aspocomp.com

### 3. Name of the register

Aspocomp Group Plc's personal data register of shareholders

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

The purpose of processing is based on the Limited Liability Companies Act and the legitimate interest of the Controller. The purpose of processing personal data is to ensure the fulfilment of the rights of the shareholders under Limited Liability Companies Act and to allow company's shareholders to register for the general meeting. The requirements of the EU Data Protection Regulation applicable as for May 25, 2018 have been taken into account in the processing of personal data.

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.

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Innovatics Oy is the technical service provider of the registration and advance voting system. The shareholders' registration and advance voting system. The shareholders' register is maintained by Euroclear Finland Oy.

## 5. Content of the register

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

- Name, personal identity code or Business ID, 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
- Other possible information necessary for the purpose of use of the register.

## 6. Regular sources of information

The shareholder enters information about him/herself and the advance votes are recorded in the system when registering to the Annual General Meeting. If using a proxy representative, the representative enters the information about the shareholder and his/her advance votes.

When registering via email or mail, the information is entered by the data controller or Innovatics Oy.

The registration system retrieves the shareholder's data based on the given personal or business ID from the shareholders' register on the record date of the Annual General Meeting maintained by Euroclear Finland Oy.

Innovatics Oy enters information about the votes of holders of nominee registered shares.

## 7. Recipients of personal data

Aspocomp as the controller will process personal data itself, but also uses an external service provider and its electronic shareholder registration system, to technically implement and maintain, as well as to process the register data stored in the system.

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

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

Information may be made available to such third parties who participate in arranging the Annual General Meeting and need the information for such purpose. No information is disclosed for commercial purposes.

Text messages to registrants are sent via a Swiss service. Otherwise, no information is transferred outside the EU or the European Economic Area.

## 9. Register protection and data retention period

All personal data is protected against unauthorized access and accidental or unlawful processing of data. 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

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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.

Innovatics Oy retains personal data for a maximum of one year after the end of the Annual General Meeting.

Euroclear Finland Oy retains personal data for a maximum of four months after the end of the Annual General Meeting.

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 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.

Personal data will only be retained for as long as it is necessary for the purposes specified in this Privacy Protection Notice or for statutory retention periods.

## 10. 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. The data subject has the following rights in connection with the personal data held by Aspocomp:

- Right to access the personal data stored on the register concerning himself/herself, including the right to receive a copy of his/her personal information
- Right to rectification or erasure of his/her personal data
- Under certain conditions, the right to request processing limitations or object to the processing of his/her data
- Request transfer of his/her personal data to another registrar
- Make a complaint to the Data Protection Authority if the data subject notices that the processing of his/her personal data is defective or unlawful.

The data subject has the right to cancel his/her consent at any time if his/her personal data is processed based on separate consent.

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 Aspocomp Group Plc, Privacy issues, Keilaranta 1, 02150 Espoo, Finland.

If you have any questions, would like further information about our privacy and information handling practices, would like to discuss opt-outs or withdrawing consent, or would like to make a complaint about a breach of the GDPR or this Privacy Protection Notice, please contact us by email: [privacy\(at\)aspocomp.com](mailto:privacy(at)aspocomp.com).

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The data subject has the right to make a complaint to the supervisory authority in the member state in which his/her habitual residence or place of employment is or where the alleged breach of the data protection regulation has occurred.