

## Privacy Protection Notice for Personal Data of the shareholders' register

This Privacy Protection Notice describes personal data processing related to Aspocomp Group Plc's Annual General Meeting 2023. Description created on March 1, 2023.

### 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. Contact person for matters regarding registration

Marian Ärväs, Manager, Administration

Aspocomp Group Plc

Keilaranta 1, 02150 Espoo, Finland

Tel: +358 20 775 6860

first name.last name(at)aspocomp.com

#### 3. Name of the register

Aspocomp Group Plc's personal data register of shareholders

#### 4. Purpose and legal basis for processing the personal data

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 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.

The technical provider of the registration system is Innovatics Ltd. The shareholders' register is maintained by Euroclear Finland Oy. For more information about the data processing carried out by these entities, please visit their websites.

#### 5. Content of the register

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

- Name, date of birth 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

Personal data is collected mainly from the person himself/herself (or his/her representative or custodian).

However, information on the ownership of the shares is collected from the shareholder register maintained by Euroclear Finland Oy.

## 7. Recipients of personal data

Aspocomp as the controller will process personal data itself, but also uses an external service provider Innovatics Ltd and its electronic shareholder registration system, to technically implement and maintain, as well as to process the register data stored in the system. Aspocomp has outsourced its IT management partly to external service provider, to which managed and protected servers the personal data is saved.

Further, the stipulations of applicable laws, ongoing legal procedures or legal requests may oblige us to transfer personal data to authorities or other third parties.

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

The text messages to registrants will be sent via a Swiss service. The European Commission has adopted a decision on the adequacy of the protection of personal data in Switzerland.

Otherwise, personal data will not be transferred outside the EU or the EEA.

## 9. Register protection and data retention period

The register has the necessary technical and organizational data security measures in place to protect personal data from disposal, destruction, misuse and unauthorized access to 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 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 register or its subcontractors 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. 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 misuses, 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**.

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.