

## 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 2024. Description created on February 19, 2024.

### 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 enable carrying out the General Meeting of the controller in accordance with the law.

The personal data of shareholders are processed only for the purposes necessary for the organization of the General Meeting, such as to inform registrants, verify then identity of the registrant and their right to participate, 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 and General Meeting Hall bookkeeping 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 the companies' own 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 such as the user's IP address.
- Other possible information necessary for the purpose of use of the register.

The register contains the list of shareholders on the record date created by Euroclear Finland for the General Meeting, containing, e.g., the shareholder's name, personal identity number/business ID, address, and number of shares.

The register contains a temporary list of shareholders created by Euroclear Finland for the General Meeting, containing information on nominee registered shareholders registered for the General Meeting and their number of shares.

## **6. Regular sources of information**

Personal data is mainly collected from the shareholder himself/herself or from his/her/its representative in connection with the registration at the General Meeting. When registering via e-mail, mail or telephone, the controller or Innovatics Oy enters the registrant's personal data and advance votes into the register.

Based on the personal data provided in connection with the registration, Innovatics Oy retrieves the number of shares of the shareholder on the record date from the list of shareholders created by Euroclear Finland.

Innovatics Oy enters the voting instructions for nominee registered shareholders represented by account operators at the General Meeting into the register.

## **7. Disclosures and transfers of personal data**

Based on the information in the register, a list of votes and a summary of the votes cast are established and attached to the minutes of the meeting. The list of votes contains information on the name of the shareholder and possible proxy and/or aid, number of the vote ticket (participant number), number of shares by share class, number of votes, basis of representation and means of attendance.

At the general meeting, in accordance with the Limited Liability Companies Act, the shareholder register is made available, which includes the names of shareholders, municipality, and the number of shares and votes according to the record date of the meeting. The list also contains information on nominee registered shareholders who are temporarily registered in the list of shareholders for the General Meeting.

## **8. Transfer of data to third parties and outside the EU or the European Economic Area**

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 an external service provider, to which managed and protected servers the personal data is saved. Data is not disclosed for commercial purposes.

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.

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.

Innovatics Oy stores personal data for a maximum of two years after the end of the General Meeting.

Euroclear Finland Oy stores personal data for a maximum of four months after the end of the 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**.

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.