

Privacy Notice for Project-Specific Insider Lists

1. Controller

Pihlajalinna Plc (Business ID 2617455-1)
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2. Contact Details for Data Protection Matters

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Data Protection Officer:
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3. Name of the Register

Project-Specific Insider Lists

4. Purpose and Legal Basis for the Processing of Personal Data

Pihlajalinna Plc maintains project-specific insider lists in accordance with Regulation (EU) No 596/2014 on market abuse ("MAR"), Commission Implementing Regulation (EU) 2022/1210, and guidance issued by Nasdaq Helsinki Ltd and the Financial Supervisory Authority (FIN-FSA).

A project-specific insider list is established for a project, event or other matter involving information that meets or may meet the definition of inside information under Article 7 of MAR. Such information is of a precise nature, has not been made public and, if made public, would be likely to have a significant effect on the prices of Pihlajalinna Plc's financial instruments or related derivative financial instruments.

The legal basis for processing personal data is Article 6(1)(c) of the General Data Protection Regulation: processing is necessary for compliance with a legal obligation to which the controller is subject. Processing personal identity codes and other unique identifiers is based on Section 29 of the Finnish

Data Protection Act and the need to identify individuals unambiguously for maintaining insider lists, regulatory supervision and compliance with related legal obligations.

5. Categories of Personal Data

Persons who have access to inside information relating to the relevant project or matter are included in the project-specific insider list. Where inside information is disclosed to parties outside the Pihlajalinna Group, such as advisers, any such party acting on behalf of or for the account of Pihlajalinna is responsible for establishing and maintaining its own insider list to the extent required by MAR.

The following personal data may be processed as required by applicable law and regulatory guidance:

- name and, where applicable, surname at birth;
- personal identity code, date of birth or other unique identifier;
- job title, position, employer or other organisation;
- work and personal contact details, where required;
- reason for inclusion in the insider list;
- date and time when the person gained access to inside information;
- date and time when access to inside information ceased;
- information on the preparation, updating and approval of the list.

6. Sources of Personal Data

Personal data is collected primarily from the data subject. It may also be obtained from the Pihlajalinna Group's internal systems, contact persons and project managers, the data subject's employer or other organisation, and external advisers, where necessary to maintain the insider list.

7. Recipients and Disclosures of Personal Data

Project-specific insider lists are maintained using the insider register service provided by Euroclear Finland Ltd (Insider Elements by Euroclear). Euroclear Finland Ltd acts as a processor on behalf of Pihlajalinna Plc.

Insider lists are not public. Personal data may be disclosed to competent authorities, in particular the Financial Supervisory Authority (FIN-FSA), where disclosure is required by law or made in response to a request from a competent authority. FIN-FSA is entitled to receive the insider list promptly upon request.

Personal data may also be processed within the Pihlajalinna Group by persons whose duties require such access and may be used, on a limited basis, to establish, exercise or defend legal claims.

8. Transfers of Personal Data Outside the EU/EEA

As a rule, Pihlajalinna Plc does not transfer personal data contained in insider lists outside the European Union or the European Economic Area.

If a service provider or its sub-processor processes personal data outside the EU/EEA, any transfer will be made in accordance with applicable data protection law and subject to appropriate safeguards, such as the standard contractual clauses adopted by the European Commission. The data subject may request further information on such safeguards from the contact persons in Section 2.

9. Retention Period of Personal Data

Personal data included in an insider list is retained for at least five (5) years from the date on which the list was created or updated. It may be retained longer where necessary to comply with a legal obligation, handle a matter before a competent authority, or establish, exercise or defend legal claims.

10. Data Security

A. Paper Records

Any paper records are kept in locked storage accessible only to persons whose duties require access to the data.

B. Electronic Records

Electronic records are stored in the insider register service provided by Euroclear Finland Ltd or another access-controlled system. Network connections are secured. Access is limited to designated persons using individual access credentials. Access rights are managed according to job responsibilities.

11. Rights of the Data Subject

In accordance with applicable data protection law, the data subject has the right to receive information about the processing of their personal data, obtain access to their personal data and request rectification of inaccurate or incomplete data.

The data subject may also have the right to request restriction of processing and exercise other rights under the GDPR to the extent applicable.

As the processing is wholly or mainly based on the controller's compliance with a legal obligation, not all data subject rights necessarily apply in full. In particular, the right to erasure and the right to object generally do not apply where processing is necessary to comply with a legal obligation.

Requests to exercise these rights may be submitted to the contact persons mentioned in Section 2.

12. Right to Lodge a Complaint with a Supervisory Authority

The data subject has the right to lodge a complaint with a competent supervisory authority if they consider that the processing of their personal data infringes applicable data protection legislation.

In Finland, the competent supervisory authority is the Office of the Data Protection Ombudsman.