

Privacy Notice for Shareholder Registers of Pihlajalinna Group Companies

1. Controller

Each limited liability company belonging to the Pihlajalinna Group acts as the controller in respect of its own shareholder registers.

Contact details:

Pihlajalinna Plc (Business ID 2617455-1) / the relevant Group company

Kehräsaari B

33200 Tampere, Finland

Tel. +358 10 312 010

2. Contact Details for Data Protection Matters

Jaakko Liljeroos

Pihlajalinna Plc

Kehräsaari B

33200 Tampere, Finland

Email: jaakko.liljeroos@pihlajalinna.fi

Tel. +358 40 162 2331

Data Protection Officer:

Marika Vihervaara

Pihlajalinna Plc

Kehräsaari B

33200 Tampere, Finland

Email: tietosuoja@pihlajalinna.fi

Tel. +358 10 312 010

3. Name of the Register

Shareholder Registers of Pihlajalinna Group Companies

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

Limited liability companies belonging to the Pihlajalinna Group maintain shareholder registers containing information on shares and their owners in accordance with the Finnish Limited Liability Companies Act. The purpose of the shareholder register is to document share ownership and maintain the information necessary for exercising rights attached to shares, and to fulfil the legal obligations applicable to the companies.

Under Chapter 3, Section 15 of the Finnish Limited Liability Companies Act, the board of directors of a company must keep a shareholder register of the shares and their owners. The shareholder register contains the information required under the Finnish Limited Liability Companies Act, such as the name and address of the shareholder and information concerning shares, share classes and any share

certificates.

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. Personal identity codes or other unique identifiers are processed only where necessary to identify the shareholder unambiguously, exercise shareholder rights or comply with legal obligations. Processing personal identity codes is based in such cases on Section 29 of the Finnish Data Protection Act.

5. Categories of Personal Data

The following personal data may be processed as required by the Finnish Limited Liability Companies Act and as necessary for maintaining the shareholder register:

- shareholder's name and contact details;
- personal identity code, date of birth, Business ID or other unique identifier, where required;
- number of shares by share class;
- identifying details of the shares or share certificates and their dates of issue;
- necessary information concerning changes in ownership and the exercise of shareholder rights;
- any information related to payments, taxation or general meetings to the extent necessary to comply with applicable law or the company's obligations.

6. Sources of Personal Data

Personal data is collected primarily from the shareholders themselves, documents relating to transfers or subscriptions of shares, and the company's decisions and other documents, as well as, where necessary, from authorities or the Trade Register. Personal data may also be obtained from the Pihlajalinna Group's internal systems or the company's agents to the extent necessary to maintain the shareholder register.

7. Recipients and Disclosures of Personal Data

The shareholder register required under the Finnish Limited Liability Companies Act must be kept available for inspection by anyone at the company's head office or another place referred to in the Finnish Limited Liability Companies Act. Everyone is entitled to receive a copy of the shareholder register or part of it upon payment of the applicable costs, in accordance with the Finnish Limited Liability Companies Act.

Based on the public nature of the shareholder register, only shareholder register information under the Finnish Limited Liability Companies Act is kept available for inspection and disclosed. Any other information, such as personal identity codes or internal information related to payments, taxation or communications, is not disclosed based on the public nature of the shareholder register unless there is a separate legal basis for the disclosure.

Personal data may also be disclosed to competent authorities, the auditor, members of the company's board of directors, and within the Pihlajalinna Group to persons whose duties require the processing of such data. Personal data may also be used to organise general meetings, exercise shareholder rights and establish, exercise or defend legal claims.

If a shareholder is subject to a non-disclosure restriction for personal safety registered in the Population

Information System or another applicable disclosure restriction, and the company has been notified of the restriction, the disclosure of contact details will comply with the restrictions laid down in the Finnish Limited Liability Companies Act and other applicable law.

8. Transfers of Personal Data Outside the EU/EEA

As a rule, personal data is not transferred outside the European Union or the European Economic Area.

If personal data is processed 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 mentioned in Section 2.

9. Retention Period of Personal Data

Personal data contained in the shareholder register is retained for as long as necessary to maintain the shareholder register, exercise shareholder rights and comply with legal obligations to which the controller is subject. Personal data may also be retained for as long as necessary to establish, exercise or defend company-law related or other legal claims.

Personal data is updated when the company receives reliable information about a change in ownership or in the information entered in the shareholder register.

10. Data Security

A. Paper Records

Any paper records, such as a shareholder register prepared for a general meeting, are kept in locked storage accessible only to persons whose duties require access to the data.

B. Electronic Records

Electronic records are stored in an access-controlled network folder or another secure system. Access is limited to designated persons using individual access credentials. Access rights are managed according to job responsibilities. Network connections and systems are secured in accordance with the Pihlajalinna Group's data security practices.

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.