

Privacy Notice for Oriola Shareholders' Meeting Register

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1 Controller

Oriola Oyj (business ID 1999215-0)
P.O. Box 8 (Orionintie 5), FI-02101 Espoo, Finland
Tel. +358 10 429 99
(hereafter “we”)

2 Contact Person for Register Matters

General Counsel Petter Sandström
P.O. Box 8 (Orionintie 5), FI-02101 Espoo, Finland
Tel. +358 10 429 5761
Email: petter.sandstrom@oriola.com

3 Name of Register

Oriola Corporation Shareholders' Meeting register

4 The Basis for and Purpose of the Processing of Personal Data

The purpose of the processing is based on the law (Limited Liability Companies Act) and our legitimate interest. In addition, the purpose of processing personal data is to ensure the rights of the shareholder's under the Limited Liability Companies Act, including payment of dividends and communication.

In addition, the purpose of processing personal data is to organize the general meeting of shareholders, in relation to which personal data is processed for registration, providing information, verifying the identity and the right to participate, as well as for other meeting arrangements. In addition, the information is used to prepare the voting list of the general meeting and to print ballot papers, to arrange any votes and to fulfill other rights and obligations set forth in the Limited Liability Companies Act and our Articles of Association. The technical implementation of the registration system, General Meeting hall bookkeeping and possible advance voting and/or possible voting during the General Meeting is carried out by Innovatics Oy. The list of shareholders is maintained by Euroclear Finland Oy. Inderes Oyj is responsible for the General Meeting service in its entirety. In addition, other service providers are used when needed.

5 The Data Content of the Register and the Groups of the Data Subjects

The register includes your following personal data as a shareholder or a representative of the shareholder:

- name
- contact information
- date of birth/ personal identification number/business ID
- number of shares by their class and the differences in the rights they create
- information concerning registration and participation in shareholders' general meetings, incl. information of impartiality, representative of a shareholder, special needs and voting data
- log data collected during registration, advance voting and remote monitoring of the meeting

Personal data is collected from you yourself and Euroclear Finland Oy.

6 To whom do we disclose and transfer data to and do we transfer data outside the EU or EEA?

We do not disclose data from the register to external parties.

Personal data is transferred to Euroclear Finland Oy in order to collect information on shareholdings. Personal data is also transferred to Innovatics Oy, which acts as the technical implementor of the registration system and advance voting of the Annual General Meeting. We have outsourced IT management partly to external service providers, on whose managed and protected servers the personal data is saved.

For recipients with Finnish phone numbers, text messages are sent via a Finnish service provider. For those with international numbers, text messages are sent using a Swiss service. The European Commission has adopted a decision on the adequacy of the protection of personal data in Switzerland. Personal data is not otherwise transferred to countries outside the European Union or the European Economic Area.

7 The Principles Concerning the Protection of the Register and the Retention Periods

Only those of our employees, who on behalf of their work have the right to process personal data, are entitled to use the systems containing personal data. Each user has a personal username and password to the system. The data is collected into databases, that are secured with firewalls, passwords and other technical measures. The databases and their backups are in locked premises and can only be accessed by certain pre-designated persons.

Personal data marked or attached to the minutes of the shareholders' meeting shall be retained as a part of the minutes, as required by the Limited Liability Company Act. 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. Other data shall be destroyed

when they are no longer necessary for drawing up the minutes or ensuring the correctness of the data thereof.

8 What are your rights as a data subject?

You have the right to inspect the personal data stored in the register concerning yourself and the right to demand rectification or erasure of the data.

You have the right to object or to demand restriction of the processing of your data and to lodge a complaint with the supervisory authority.

On grounds relating to your particular situation you also have the right to object other processing activities when the legal basis of processing is the legitimate interest. In connection with your request, you shall identify the specific situation, based on which you object to the processing. We can refuse the request of objection only on legal grounds.

9 Who can you contact?

The contacts and requests concerning this privacy notice must be submitted in writing or in person to the person mentioned in section two (2).