

# Privacy statement

This privacy statement describes the processing of personal data in the context of Sievi Capital Plc Annual General Meeting of 4 May 2023.

Updated 5 April 2023.

## 1. Data controller

Name	Sievi Capital Plc
Address	Pohjoisesplanadi 33, FI-00100 Helsinki
Business ID	0190457-0

## 2. Contact person

Name	Tiina Gröndahl
Address	Sievi Capital Plc Pohjoisesplanadi 33, FI-00100 Helsinki
Email	tiina.grondahl@sievicapital.fi
Tel.	+358 40 846 0860

## 3. Name of the register

Sievi Capital Plc's Register for General Meetings

## 4. The purpose and legal basis for processing personal data

The purpose of processing personal data is to enable carrying out the General Meeting of the controller in accordance with the law.

Personal data are processed only for the purposes necessary for the organisation of the General Meeting, such as to verify the identity of the registrant and their right to participate, preparing a list of participants, a list of votes and possible voting tickets, organizing any voting, and manage possible preliminary questions and requests to be heard.

The technical implementation of the registration system and possible advance voting at the General Meeting is carried out by Innovatics Ltd. The list of shareholders is maintained by Euroclear Finland Oy.

Processing of personal data is based on the legal obligations of the controller.

## 5. Processed personal data

The processed personal data include the shareholder's and their possible proxy's name, personal identity number and/or business ID, address, contact details, number of shares and votes, voting information, authentication method, basis of representation, date of registration, and possible information on aid, power of attorney, preliminary questions, and any additional information provided in connection with the registration. When participating in the General Meeting, the time of arrival and departure of each participant

are recorded. For technical maintenance and monitoring of the service, log data on registration and voting, as well as the user's IP address are also recorded.

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 data**

Personal data is mainly collected from the shareholder themselves or from their representative in connection with the registration to the General Meeting. When registering via e-mail, mail or telephone, the controller or Innovatics Ltd enters the registrant's personal data and advance votes into the register.

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

Innovatics Ltd 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 meeting participants and a summary of voting are established that are attached to the minutes of the meeting.

In accordance with the Limited Liability Companies Act, a list of shareholders is displayed at the General Meeting containing the names of the shareholders, the municipality and the number of shares and votes on 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**

The data contained in the register may be shared with third parties involved in organising the General Meeting who need the registered data in their operations. Data is not disclosed for commercial purposes.

Text messages to registrants are sent through a Swiss service.

Otherwise, personal data is not transferred or disclosed outside the EU or the European Economic Area.

## **9. Basis for register protection**

Physical material is stored in a locked room accessible only to persons entitled to the data.

Electronic material is stored in a data room that meets the requirements for the processing of personal data. The connection from the user's browser to the server is encrypted. Access to the register is limited to the employees of the controller and subcontractors who need and process data to organise the General Meeting.

## **10. Storage and deletion of personal data**

Innovatics Ltd stores personal data for a maximum of one year 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.

The minutes of the General Meeting and the list of votes attached thereto are stored permanently. It includes the names of shareholders who participated in the General Meeting, the names of potential proxies and aids, the number of shares and votes, and the numbers of the voting tickets.

Other data is destroyed when it is no longer necessary to draw up the minutes or to verify their accuracy.

## **11. Rights of the data subject**

The data subject has the right to know the data stored about them in the register. The data subject has the right to request rectification, deletion or complementing of their data. Any request shall be addressed in writing to the contact person mentioned in Section 1 above.

The data subject has the right to lodge a complaint with the Data Protection Ombudsman if they have objections to the processing of personal data. The instructions are found on the website of the Data Protection Ombudsman at <https://tietosuoja.fi/en/>.