

# Privacy Statement

This privacy statement describes the processing of personal data in the context of Sievi Capital Plc's Extraordinary General Meeting of 16 December 2021.

Updated 12 November 2021.

## 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. Register name

Sievi Capital Plc's Register for General Meetings

## 4. Purpose and basis of processing of personal data

The purpose of the processing of personal data is to enable the data controller to conduct the general meeting and to comply with other legal obligations related to the general meeting. The processing includes the registration of shareholders and voting in the general meeting. The information will be used for the compilation of the attendance list, the ballots and the list of votes of the meeting, as well as for the management of questions submitted in advance and requests for the floor.

The technical implementer of the General Meeting registration system and advance voting is Innovatics Oy. Shareholder register is maintained by Euroclear Finland Oy.

The processing of personal data is based on the data controller's legal obligations.

## 5. Data content of the register

With respect to each shareholder registering for the meeting, the register contains their name, personal identity code, contact details, date of registration and, if applicable, the information about their agent, assistant and power of attorney as well as any additional information provided upon registration. Log data on registration and voting are stored in the register. In addition, the time of arrival to and departure from the meeting will be recorded for participants.

The register contains the shareholder register on the record date created by Euroclear Finland for the general meeting, containing, among other things, the name, personal/business ID, address and number of shares of each shareholder.

The register contains the temporary shareholder register created by Euroclear Finland for the general meeting, containing the information about nominee-registered shareholders who have registered for the meeting.

## **6. Regular sources of data**

When a shareholder registers for the meeting, their information is collected and their advance votes are stored. An agent enters the personal information and advance votes of the shareholder they are representing.

When registering by email or post, the data controller or Innovatics Oy enters the personal information and advance votes of the registrant.

The system uses the personal/business ID to retrieve the number of shares held by the shareholder from the record date shareholder register created by Euroclear Finland Oy.

Innovatics Oy enters the voting instructions given by the nominee-registered shareholders represented by account operators in the general meeting.

## **7. Regular disclosures of data**

On the basis of the data contained in the register, a list of participants in the meeting and summaries of votes will be drawn up and annexed to the minutes of the meeting.

As required by the Finnish Limited Liability Companies Act, the shareholder register will be kept available at the meeting, detailing the names of shareholders, their domicile and their numbers of shares and votes on the record date. In addition, the list will include the information of nominee-registered shareholders who have been registered temporarily in the shareholder register for the purposes of the general meeting.

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

Data in the register may be shared with third parties who participate in the organisation of the general meeting and need registered data for their own activities. The data will not be disclosed for commercial purposes.

Text messages to registered users are sent via a Swiss service. Switzerland is one of the countries for which a Commission adequacy decision exists (2000/518/EC). Otherwise, personal data will not be disclosed or transferred outside the EU or the European Economic Area.

## **9. Basics of Register Access Protection**

Physical materials are stored in a locked space accessible only to those entitled to the data.

Electronic materials are stored in a data centre that meets the requirements for the processing of personal data. Communications from the user's browser to the server are encrypted. Access to the register is restricted to a limited number of the data controller's employees and subcontractors who need and process the data for the organisation of the general meeting.

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

Innovatics Oy will store the personal data for a maximum of one year after the end of the general meeting.

Euroclear Finland Oy will store the personal data for a maximum of four months after the end of the general meeting.

The list of participants in the general meeting is attached permanently to the minutes of the general meeting. It contains the names of the shareholders who participated in the meeting, the names of agents and assistants, if any, the numbers of shares and votes and the numbers of ballot papers.

Any other information will be removed when it is no longer necessary for the purpose of drawing up the minutes or verifying the accuracy of the information contained therein.

## **11. Rights of the data subject and how to exercise them**

The data subject has the right to receive confirmation that personal data concerning them is being processed or that it is not being processed and, if such personal data is being processed, the right to be informed of the data concerning them recorded in the register. The data subject has the right to rectification or completion of personal data concerning them. Any requests shall be addressed to the contact person mentioned in section 2 above.

## **12. Right to lodge a complaint with the supervisory authority**

Data subjects have the right to lodge a complaint with the supervisory authority if the data subject considers that the processing of personal data relating to them infringes the EU General Data Protection Regulation (679/2016).

Contact details of the Office of the Data Protection Ombudsman:

Visiting address	Lintulahdenkuja 4, FI-00530 Helsinki
Postal address	P.O. Box 800, FI-00531 Helsinki
Switchboard	+358 29 566 6700
Email	tietosuoja@om.fi