

4.4.2022

INFORMATION NOTICE

ANNUAL GENERAL MEETING 2022 OF SITOWISE GROUP PLC

1 Data controller and contact information

Sitowise Group Plc
Linnoitustie 6, 02600 Espoo, Finland
privacy@sitowise.com

2 Contact person of the data controller and contact information

Legal Counsel Maisa Cederström
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Tel. 020 747 6000 (switchboard)

3 Purposes for processing personal data

In this Information Notice, data controller Sitowise Group Plc (hereinafter "**Sitowise**" or "**data controller**") gives required information pursuant to applicable data protection legislation on how personal data of shareholders, representatives of shareholders, proxy representatives and their possible advisors are processed for purposes related to Annual General Meeting of Sitowise to be held on 20 April 2022 ("**Annual General Meeting**").

Personal data are processed for the following purposes:

- Collecting registrations for the Annual General Meeting, verifying identity of each registrant and their shareholdings, as well as to check the right to participate
- For managing participant list, list of votes and voting tickets as well for carrying out voting

Furthermore, personal data may be processed for other purposes related to organizing the Annual General Meeting and related necessary registrations.



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4 Legal basis for processing the personal data

The legal basis for processing of the personal data is compliance with data controller's legal obligations. Data controller's legal obligations are primarily based on obligations for organizing a general meeting pursuant to the Finnish Companies Act, the Finnish Securities Markets Act, as well as other legislation which obligates data controller.

5 Categories of data subjects and types of personal data processed

The register contains personal data of the following data subjects:

- shareholders
- representatives of shareholders
- proxy representatives of shareholders
- their possible advisors
- individuals who have registered for and attended the Annual General Meeting

The following personal data of the data subjects, relevant on the basis of the above-mentioned purposes of processing, are processed, as such:

- name
- personal identity number
- address
- email address
- phone number
- number of the book-entry account
- number of shares and votes held
- voting information

Processing of personal data is necessary for the purpose of complying with data controller's legal obligations.

6 Regular sources of personal data

Personal data are primarily received directly from the data subject and/or their representative, proxy representative or advisor. Likewise, when shareholder gives authorization, personal data of the authorized representative is received from the shareholder. Sitowise receives proxy authorization documents from Innovatics Ltd to which the shareholder has submitted the proxy authorization documents.



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Personal data are primarily collected in connection with registration for the Annual General Meeting. Sitowise receives voting instructions forms from Innovatics Ltd to which the shareholder has submitted the voting instructions form available on Sitowise's website.

The list of votes will be adopted according to the information provided by Euroclear Finland Oy and Innovatics Ltd.

Shareholding information is collected from Sitowise's shareholder register. Personal data which is collected in connection with registration for the Annual General Meeting are checked against Sitowise's shareholder register. Sitowise's shareholder register is maintained by Euroclear Finland Oy. The shareholder register is subject to constant updates.

7 Processors and recipients of personal data

In addition to data controller, personal data of individuals who have registered for the Annual General Meeting are processed by Innovatics Ltd, Euroclear Finland Oy and their respective subcontractors.

Innovatics Ltd processes personal data in electronic general meeting service. When shareholders who are natural persons log into the service they are directed to the electronic authentication. For shareholders that are legal persons, shareholder's book-entry number and business identity code or similar identifier is required.

Also, other reputable service providers may process personal data on Sitowise's behalf. Sitowise has executed appropriate contractual arrangements with such service providers to ensure compliance with data protection legislation. Such service providers can be, for example, IT service providers and legal counsels.

Sitowise group companies may process personal data in accordance with data protection legislation. Access to personal data is restricted only to such employees who have a need to know the personal data for carrying out their duties.

All persons processing personal data have committed to confidentiality obligations.



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8 Transfers of personal data to countries outside the European Union or the European Economic Area

Personal data contained in the register may be transferred to countries outside the European Union or the European Economic Area if it is necessary for using information systems. In such events, all parties involved in the transfer shall ensure that the personal data is transferred and processed in accordance with the requirements of the applicable data protection legislation, such as standard contractual clauses approved by the European Commission and necessary additional safeguards or other approved transfer mechanism.

9 Retention period of the personal data

Data controller shall retain the personal data for a period necessary to achieve the purposes determined in Section 3 of this Information Notice. However, data controller may retain the personal data for a longer period if required by legislation. Such responsibilities and obligations may arise from, for example, accounting, reporting or other specific legislation.

Minutes of the Annual General Meeting, participant lists, and other general meeting material shall be retained permanently.

10 Rights of the data subject

The data subject has the rights as stipulated in the applicable data protection legislation, most essential rights are described below.

Right	Description
Right of access	The data subject has the right to obtain confirmation from the data controller as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and a copy of the personal data processed.
Right to rectification, erasure and restriction of processing	The data subject has the right to obtain the rectification or erasure of inaccurate, unnecessary, defective or outdated



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personal data concerning him or her, or request restriction of processing on grounds stipulated in the legislation.

Right to lodge a complaint with a supervisory authority

Supervisory authority in Finland is the Office of the Data Protection Ombudsman. Contact details and instructions are available on address www.tietosuoja.fi.

Exercise of data subject rights

Data subject can use their data subject rights by contacting data controller by sending an email to address tietosuoja@sitowise.com.

Data controller strives to answer to the data subject as soon as possible and primarily within a month at the latest after the data subject has presented their request and data subject's identity has been verified. If necessary, data controller will give further instructions or present further questions due to the data subject's request.

Before fulfilling the data subject's request data controller has the right as well as the obligation to verify the data subject's identity. Data controller needs to be able to identify the data subject in a sufficient manner.

If the data subject's request cannot be fulfilled, data controller will notify the data subject thereof within the time limits set forth above.

11 Profiling

Data controller does not use solely automated decision-making, such as automated profiling, as part of processing the personal data.

12 General description of appropriate technical and organizational measures

Data controller has implemented appropriate technical and organizational measures. The purpose of the measures is to ensure appropriate security of the personal data, including protection against accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data. Data controller has ensured by contractual arrangements that also the service providers used by data controller are committed to secure processing of personal data.



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Access rights to personal data registers have been given only to such employees of data controller who have signed appropriate confidentiality undertakings.

Data controller has provided binding written instructions and orders concerning processing of personal data and data protection to its employees who process personal data, which instructions and orders the employees have committed to comply with.

Information systems are protected, for example, with firewalls, encryption techniques and access right restrictions to processed personal data.

13 Further information

Should the data subject have any questions regarding processing of personal data carried out by data controller, the data subject can contact data controller by using contact information provided in the first page of this Information Notice.

This Information Notice concerns only the Annual General Meeting of Sitowise. General processing of personal data carried out by Sitowise is described in Sitowise's general privacy notice, which is available at: <https://www.sitowise.com/privacy-notice>.

Data controller may have to amend this Information Notice from time to time. Amendments are informed on data controller's website.

This Information Notice has been updated last time on 4 April 2022.

