

# Description of Data Protection for Registrants for the Annual General Meeting of Pihlajalinna Plc

## 1. Register Controller

Pihlajalinna Plc (2617455-1)  
Kehräsaari B  
FI-33200 Tampere, Finland  
+358 30 6060

## 2. Contact Person in Register Related Matters

Pihlajalinna Plc  
Marko Savolainen  
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FI-33200 Tampere, Finland  
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+358 400 195 213

## 3. Name of the Register

Registrants for the Annual General Meeting of Pihlajalinna Plc.

## 4. Purpose for Processing the Personal Data

Registration of Pihlajalinna Plc's shareholders to the Annual General Meeting or Extraordinary General Meeting of Pihlajalinna Plc in the manner indicated in the notice of the General Meeting.

Personal data is collected from persons who register to the Annual General Meeting or Extraordinary General Meeting of Pihlajalinna Plc. The purpose for the collection of personal data is to enable shareholders of Pihlajalinna Plc to register to the Annual General Meeting and to ascertain a registrant's identity and his/her right to participate in the Annual General Meeting.

Euroclear Finland Ltd will act as the technical facilitator and administrator of the general meeting registration system. The registrations are collected into Euroclear Finland Ltd's general meeting system.

Pihlajalinna Plc does not disclose data.

## 5. Content of the Register

In case a shareholder registers for the Annual General Meeting on the Internet, Euroclear Finland Ltd will act as the technical facilitator of data collection. The connection from the user's browser to the Euroclear Finland Ltd's server is encrypted with SSL technology. Through this service, the following data can be collected: name, personal identity number, business ID, address, phone number, email address, book-entry account number, number of shares and votes and information about voting.

The book-entry account number is used exclusively for the identification in Euroclear Finland Ltd's system and will not be disclosed to the company.

## **6. Regular Sources of Information**

When registering for the meeting on the Internet, a person enters information about himself/herself. When signing up in any other manner, the shareholder declares his/her name and personal identity number/business ID. On the basis of the personal identity number provided, the system compares the information given to a list of shareholders of Pihlajalinna Plc maintained by Euroclear Finland Ltd and extracts the registrant's ownership information from the list.

When authorising a proxy or when an assistant is used, the person also enters the required personal data of the proxy/assistant into the system. No data is disclosed.

## **7. Regular Disclosure of Data**

No data is disclosed.

## **8. Transfer of Data outside the EU or the European Economic Area**

No data is disclosed.

## **9. Principles for how the Register is Secured**

### **A. Manual data**

Manual data is kept in a locked space and is available only to certain authorised persons.

### **B. Electronic data**

Electronic data is kept in Euroclear Finland Ltd's general meeting service. Euroclear Finland Ltd is responsible for the technical maintenance of the register. The connection from the user's browser to the Euroclear Finland Ltd's server is encrypted with SSL technology. Only certain authorised persons have access to the data stored in the registration system. The data is protected by user ID and password.

## **10. Right of Inspection**

A shareholder is entitled to know, after having supplied the necessary details, what kinds of data on him/her are stored in the register or to receive a confirmation that the register does not contain any data concerning the shareholder. The shareholder who wishes to inspect the data on himself/herself, must make a request to this effect to the register controller in a personally signed or otherwise comparably verified document.

## **11. Right of Rectification**

The register controller shall, on its own initiative or at the request of the registered shareholder, without undue delay rectify, erase or supplement personal data contained in the register if it is erroneous, unnecessary, incomplete or obsolete as regards the purpose of the processing the data. The register controller shall also prevent the dissemination of such data, if this could compromise the protection of privacy of the shareholder or his/her rights. If the register controller refuses the request of the registered shareholder of the rectification of data, a written certificate to this effect shall be issued. The certificate shall also mention the reasons for the refusal. The shareholder may bring the matter to the attention of the Data Protection Ombudsman. The register controller shall

give a notification of the rectification of data to the parties to whom the register controller had disclosed erroneous personal data or from whom the register controller has received such erroneous personal data. However, there is no notification obligation if doing so would be impossible or unreasonably difficult. The rectification requests described above, which must be sufficiently detailed, shall be sent to the register controller's contact person.