

## **DESCRIPTION OF DATA PROTECTION**

Personal Data Act (523/1999) 10 § and 24 §

Date of drafting: March 9, 2017

### **1. Register Controller**

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

### **2. Contact Person in Registration Related Matters**

Kaisa Kovaniemi

Contact information:  
Pihlajalinna Plc  
Kehräsaari B, 33200 Tampere  
Finland  
[kaisa.kovaniemi@pihlajalinna.fi](mailto:kaisa.kovaniemi@pihlajalinna.fi)  
+358 40 637 8181

### **3. Name of the Register**

Registrants for the Annual General Meeting of Pihlajalinna Plc to be held on April 4, 2017.

### **4. The Purpose for Processing the Personal Data/purpose of the Use of the Register**

Personal data is collected from persons who register to the Annual General Meeting of Pihlajalinna Plc to be held on April 4, 2017.

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 of data collection. The registrations are collected into Euroclear Finland Ltd's general meeting system.

Pihlajalinna Plc does not hand out information.

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### **5. The Content of the Register**

In case a shareholder registers for the Annual General Meeting on the Internet, Euroclear Finland Ltd will act as a 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.

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 Source of Information**

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

When authorizing a proxy or when an assistant is used, a person also enters the required personal data of the proxy representative and/or the assistant into the registration system.

### **7. Regular Destinations of Disclosed Data and whether the Data is Transferred to Countries Outside the European Union or the European Economic Area**

No information is handed over.

### **8. The Principles how the Data File/register is Secured**

#### **A. Manual Register**

Manual data is kept in a locked secured place and is available only for authorized persons.

#### **B. Electronic Data Register**

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

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### 9. The Right of Inspection

A shareholder is entitled to access, after having supplied sufficient search criteria, to the data on him/her in the personal data file, or to receive a confirmation from the register controller that the data file does not contain any personal data concerning the shareholder.

The shareholder who wishes to have access to the data on himself/herself, as referred to above shall make a request to this effect to the register controller personally signed or otherwise comparably verified document. This confirmation can be requested either by email to the email address [kaisa.kovaniemi@pihlajalinna.fi](mailto:kaisa.kovaniemi@pihlajalinna.fi) or by mail to the address Pihlajalinna Plc, Kaisa Kovaniemi, Kehräsaari B 33200 Tampere Finland.

### 10. The 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 personal data file 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 shareholder of the rectification of an error, a written certificate to this effect shall be issued. The certificate shall also mention the reasons for the refusal. In such an event the shareholder may bring the matter to the attention of the Data Protection Ombudsman. The register controller shall notify the rectification to the recipients who have gained erroneous personal data and to the source of such erroneous personal data. However, there is no obligation to these notifications if doing so would be impossible or unreasonably difficult. Above described requests for rectification, which must be sufficiently detailed, shall be sent either by email to the email address [kaisa.kovaniemi@pihlajalinna.fi](mailto:kaisa.kovaniemi@pihlajalinna.fi) or by mail to the address Pihlajalinna Plc, Kaisa Kovaniemi, Kehräsaari B 33200 Tampere Finland.