

PRIVACY NOTICE – Shareholders and investors

Previous update: January 2022

We at CapMan respect the privacy of all our stakeholders. Our privacy notices describe how we process personal data in accordance with the EU's General Data Protection Regulation ("**GDPR**").

This Privacy Notice applies to processing of personal data of persons who have holdings in CapMan Plc's financial instruments, such as shareholders and bondholders ("**you**").



1. Data controllers

The controller of your personal data is CapMan Plc and/or one or more of its group companies. Each CapMan group company is responsible for the processing of personal data in its own activities for the purposes and on legal bases set out in this Privacy Notice and may use the necessary personal data collected by other group companies for the same purposes.

2. Contact

If you have questions regarding this Privacy Notice or wish to exercise your rights, you may contact:

CapMan Plc
Privacy Matters
Ludviginkatu 6, 00130 Helsinki
Email privacy@capman.com

3. What personal data do we collect and process?

We generally collect and process the following types of personal data:

- Contact information such as name, address, phone number and email address
- Other identification information such as personal identity number, date of birth or other similar identifier and nationality
- Data related to holdings in CapMan's financial instruments such as amount of financial instruments, rights attached to those instruments and book-entry account number

- Information on shareholders' participation in the general meetings (including powers of attorney) and other similar shareholder and investor events
- Data on proxy representatives and assistants representing and/or assisting shareholders in general meetings and other similar shareholder and investor events
- Data on the use of shareholder and investor rights
- Information provided to us in notifications of major shareholdings (flagging notifications)
- Information on guardianship

4. Why do we collect and process personal data?

We process your personal data for the purposes of identification, maintaining registers of holders of financial instruments, communicating and keeping in touch with you, arranging general meetings, results information events and other shareholder and investor events, dividend and interest payments and equity repayments, fulfilling our obligations as a publicly listed company, fulfilling our contractual obligations and performing our customary administrative and organizational functions. Personal data can also be used to ensure the security of our premises, IT systems and employees.

5. What is the legal basis for processing?

Under data protection laws, we need to have lawful grounds for processing your personal data. Sometimes more than one lawful ground applies. The legal basis for processing your personal data for the abovementioned purposes is primarily our obligation to comply

with applicable laws and regulations such as the Finnish Companies Act and Securities Markets Act and our contractual obligation to you. In addition, data processing may also be based on our legitimate interest to conduct our administrative processes and our other business appropriately and effectively. We may also base our data processing on your express consent.

6. What are our information sources?

We collect personal data from various sources but mainly from you or the organization you represent. Additional information sources include Euroclear Finland (national central securities depository), account operators, public registers such as trade register and corresponding foreign registers and/or entities. Information sources are used within the limits of the applicable laws, and your consent is requested when necessary.

7. How and with whom do we share personal data?

We may share your personal data between different entities within the Group for the abovementioned purposes. We are required to publish information on major holdings and largest shareholders on our website, and the full shareholder register must be made available to anyone who wants to review it. Further, we use services of various service providers and may transfer personal data to such third-party service providers. Such services include e.g. general meeting registration, IT services and event organisers. If required by law or regulation, we may disclose personal data to authorities.

Sometimes we may need to transfer personal data outside EU or EEA for instance because a service provider is in a third country. Such transfer would only be made (i) to a country in which the level of data protection is adequate for safeguarding the transferred personal data according to the EU Commission; (ii) using appropriate safeguards such as the EU Commission's standard contractual clauses in accordance with applicable data privacy laws and regulations; or (iii) if the transfer is specifically agreed upon with you.

8. How long is the personal data retained?

We generally store your personal data only for as long as it is necessary for the purposes for which the data was collected. When personal data is no longer needed, it will be deleted or anonymized, unless we have a legal obligation to retain data for a longer period. This means that the retention periods vary depending on the processing purpose, type of personal data, and local requirements.

9. How do we ensure that your personal data is safe with us?

We implement technical and organizational security measures to protect personal data from loss, misuse, unauthorized access, disclosure, alteration or destruction. Only specific personnel of CapMan and of our third-party service providers are given access to personal data, and these employees and third-party service providers are required to treat this information strictly confidential.

10. What are your rights?

You are entitled to obtain information of your personal data that we process and have access to or obtain a copy of such personal data. You are also entitled to request us to correct, update or remove your personal data. To the extent required by applicable data protection law, you have a right to prohibit or restrict data processing and request data portability, i.e. transfer of your personal data in a structured, commonly used machine-readable format to you or to another data controller.

You should be aware that certain information is strictly necessary for the performance of a contract or for compliance with our legal obligations, which may set limits to some of the rights listed above. In case the data processing is based on your consent, you may at any time contact us and revoke your consent. Withdrawal of consent does not affect the lawfulness of data processing before the withdrawal.

If you find your legal rights violated, you have the right to file a complaint with a competent authority. According to the GDPR you may lodge complaint in the EU Member State of your habitual residence, place of work or place of the alleged infringement.

Please send any requests regarding your rights to privacy@capman.com. We will answer to your request within one month of receipt of your request unless there are justified reasons to extend this time by two further months. If we cannot fulfil your request, e.g. due to our obligations, we will inform you in writing within the same time frame and explain to you the reasons why we are unable to fulfil your request. You can lodge a complaint with the supervisory authority if you disagree with our decision.

11. Updates to Privacy Notice

We may amend this Privacy Notice from time to time.