

Privacy Notice for Oriola Shareholders' Meeting Register

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1 Controller

Oriola Oyj (business ID 1999215-0)
P.O. Box 8 (Orionintie 5), FI-02101 Espoo, Finland
Tel. +358 10 429 99
(hereafter “we”)

2 Contact Person for Register Matters

General Counsel Petter Sandström
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3 Name of Register

Oriola Corporation Shareholders' Meeting register

4 The Basis for and Purpose of the Processing of Personal Data

The purpose of the processing is based on the law and our legitimate interest. In addition, the purpose of processing personal data is to ensure the rights of the shareholder's under the Limited Liability Companies Act, including payment of dividends and communication.

In addition, the purpose of processing personal data is to organize the general meeting of shareholders, in relation to which personal data is processed for registration, providing information, verifying the identity and the right to participate, as well as for other meeting arrangements. In addition, the information is used to prepare the voting list of the general meeting and to print ballot papers, to arrange any votes and to fulfill other rights and obligations set forth in the Limited Liability Companies Act and our Articles of Association. The technical implementation of the registration system, General Meeting hall bookkeeping and possible advance voting and possible voting during the General Meeting is carried out by Innovatics Oy. The list of shareholders is maintained by Euroclear Finland Oy. Inderes Oyj is responsible for the General Meeting service in its entirety. In addition, other service providers are used when needed.

5 The Data Content of the Register and the Groups of the Data Subjects

The processed personal data include the shareholder's and their possible proxy's name, personal identity number and/or business ID, address, contact details, number of shares and votes, voting information, authentication method, basis of representation, date of registration, and possible information on aid, power of attorney, preliminary questions, and any additional information provided in connection with the registration. When participating in the General Meeting, the time of arrival and departure of each participant are recorded. For technical maintenance and monitoring of the service, log data on registration and voting, as well as the user's IP address are also recorded.

The register contains the list of shareholders on the record date created by Euroclear Finland for the General Meeting, containing, e.g., the shareholder's name, personal identity number/business ID, address, and number of shares.

The register contains a temporary list of shareholders created by Euroclear Finland for the General Meeting, containing information on nominee registered shareholders registered for the General Meeting and their number of shares.

Personal data is collected from you yourself or from your representative and Euroclear Finland Oy. Innovatics Oy enters the voting instructions for nominee registered shareholders represented by account operators at the General Meeting into the register.

6 To whom do we disclose and transfer data to and do we transfer data outside the EU or EEA?

We do not disclose data from the register to external parties.

Based on the information in the register, a list of votes and a summary of the votes cast are established and attached to the minutes of the meeting. The list of votes contains information on the name of the shareholder and possible proxy and/or aid, number of the vote ticket (participant number), number of shares by share class, number of votes, basis of representation and means of attendance.

At the general meeting, in accordance with the Limited Liability Companies Act, the shareholder register is made available, which includes the names of shareholders, municipality, and the number of shares and votes according to the record date of the meeting. The list also contains information on nominee registered shareholders who are temporarily registered in the list of shareholders for the General Meeting.

The data contained in the register may be shared with third parties involved in organising the General Meeting who need the registered data in their operations. Data is not disclosed for commercial purposes.

For recipients with Finnish phone numbers, text messages are sent via a Finnish service provider. For those with international numbers, text messages are sent using a Swiss service. The European Commission has adopted a decision on the adequacy of the protection of personal data in Switzerland. Personal data is not otherwise transferred to countries outside the European Union or the European Economic Area.

7 The Principles Concerning the Protection of the Register and the Retention Periods

Only those of our employees, who on behalf of their work have the right to process personal data, are entitled to use the systems containing personal data. Each user has a personal username and password to the system. The data is collected into databases, that are secured with firewalls, passwords and other technical measures. The databases and their backups are in locked premises and can only be accessed by certain pre-designated persons.

Personal data marked or attached to the minutes of the shareholders' meeting shall be retained as a part of the minutes, as required by the Limited Liability Company Act. Innovatics Oy stores personal data for a maximum of two years after the end of the General Meeting. Euroclear Finland Oy stores personal data for a maximum of four months after the end of the General Meeting. Other data shall be destroyed when they are no longer necessary for drawing up the minutes or ensuring the correctness of the data thereof.

Physical material is stored in a locked room accessible only to persons entitled to the data. Electronic material is stored in a data room that meets the requirements for the processing of personal data. The connection from the user's browser to the server is encrypted. Access to the register is limited to the employees of the controller and subcontractors who need and process data to organise the General Meeting.

8 What are your rights as a data subject?

You have the right to inspect the personal data stored in the register concerning yourself and the right to demand rectification or erasure of the data.

You have the right to object or to demand restriction of the processing of your data and to lodge a complaint with the supervisory authority.

On grounds relating to your particular situation you also have the right to object other processing activities when the legal basis of processing is the legitimate interest. In connection with your request, you shall identify the specific situation, based on which you object to the processing. We can refuse the request of objection only on legal grounds.

9 Who can you contact?

The contacts and requests concerning this privacy notice must be submitted in writing or in person to the person mentioned in section two (2).