

PRIVACY NOTICE

MANAGEMENT TRANSACTIONS

1. General information

This Privacy Notice describes how Kamux Ltd (business ID: 1578666-7) (“**Kamux**” or “**Company**”) processes personal data; what personal data the Company collects, how the data is used and to whom the data is disclosed, and how the data subject can control the processing. The Privacy Notice also informs about the obligations the Company follows when processing personal data.

The Company is dedicated to protecting the privacy of the data subjects and commits to process their personal data in compliance with the European Union’s General Data Protection Regulation (2016/679) (“**GDPR**”) and other applicable privacy laws and regulations and good data processing practice. Ensuring the privacy is part of the Company’s entire business.

This Privacy Notice is applicable to personal data relating to persons working in management positions and their closely associated persons under the Market Abuse Regulation ((EU) No 596/2014) (“**MAR**”). MAR obliges the persons in management positions in Kamux and their closely associated persons to inform Kamux and the Financial Supervisory Authority about the transactions they do with Kamux shares, debt instruments, derivatives or other financial instruments.

“*Personal data*” refers to any information about natural person (“**data subject**”), which allows a person to be directly or indirectly identified as an individual person, as defined in the GDPR. Information about the data subject that can not be identified, directly or indirectly, is not personal data.

2. Controller and data protection officer

Controller: Kamux Oyj
Address: Parolantie 66 A, 13130 Hämeenlinna
Contact Details: Email: privacy@kamux.fi

Data Protection Officer: communication manager Satu Ojala
Contact Details: Email: privacy@kamux.fi

3. Purpose and legal basis of the processing of personal data

The purpose of the register is to comply with the regulation and the related statutory obligations governing the transactions of the persons in management positions and their closely associated persons under Article 19 of Regulation (EU) No 596/2014 (MAR).

The legal basis for processing personal data is primarily the Company's statutory obligations.

4. Personal data processed and sources of information

The Company collects and processes only personal data which is relevant and necessary for the purposes outlined in this Privacy Notice.

We collect the following categories of data:

Categories of personal data	Examples of personal data
Contact information	First name, last name and maiden name, address, phone numbers, email address.
Identify information	Date of birth, national identity number, nationality.
Contact information of the contact person	First name, last name, address, email address and phone number of the authorized person or contact person.
Information on the status of the data subject	Starting date of the manager status or closely associated person status, the position of the manager.
Information on the closely associated persons of the data subject	The basis for being a closely associated person.
Other information collected under the article 19 of the MAR	Transaction notifications, description and identifier of financial instrument and the price and volume of the transaction or transactions received by the controller.

Primarily, personal data is collected from data subjects, i.e. from persons in management position and their closely associated persons, and possibly from their authorized persons and contact persons. Personal data can also be collected from public sources such as a trade register.

5. Retention of the personal data

The Company will retain the personal data for as long as is necessary to fulfil the purposes outlined in the Privacy Notice unless a longer retention period is required by law (for example regarding obligations and responsibilities related to special legislation, accountancy or reporting) or unless the Company needs the information for drafting or presenting a claim or for a legal defence or for resolving a dispute of a similar nature.

Information considering the person in the management, his/her closely associated persons or contact person, are retained as long as the person concerned is in the management position. Information about the closely associated persons and the contact person can also be changed if needed, even during the period when the person is considered to be in a management position. Information on the transactions of the management and their closely associated persons are maintained for five years after the disclosure of the transactions.

6. Recipients of personal data

Kamux may transfer personal data internally between companies belonging to the same group with Kamux Ltd.

Kamux may, in accordance with this Privacy Notice, outsource the process of personal data to the service providers or subcontractors. In addition, inter alia the following parties are involved in processing personal data: Euroclear Finland Ltd. The Company ensures with adequate contractual obligations that personal data is handled properly and lawfully.

Information may be disclosed to authorities, such as the Financial Supervisory Authority and the police based on the MAR and other statutory obligations, and for stock exchange releases to Nasdaq Helsinki Ltd.

The Company may also have to disclose personal data of data subjects in case of emergencies or in other unexpected situations to protect human life, health and property. Additionally, the Company may have to disclose the personal data of the data subjects if the Company is part of legal proceedings or other dispute resolution proceedings.

If Kamux is involved in a merger, business transaction or other transaction, it may be required to disclose the personal data to third parties. The data protection of the data subjects is also protected in said transactions and shall be duly notified to the data subjects when necessary.

The transfer of data to a third party is mainly done by electronic data transmissions, but information may also be disclosed by other means, such as by telephone or by letter.

7. Transfer of personal data outside EU/EEA

Personal data will not be transferred outside the European Union or the European Economic Area.

8. Principles of protection of personal data

Kamux processes personal data in a manner that seeks to ensure the proper security of personal data, including the protection against unauthorized processing and accidental loss, destruction or damage.

The Company uses appropriate technical and organizational safeguards to protect this, including the use of firewalls, encryption techniques and safe device facilities, proper access control and guidance for personnel and subcontractors involved in processing personal data.

All persons processing the personal data have a professional confidentiality under the laws and contract confidentiality provisions in relation to issues concerning the personal data.

9. Rights of the data subjects

The data subject have the rights set out in the applicable data protection legislation.

Right to access and verify

The data subject has the right to obtain a confirmation that personal data is processed.

You have the right to verify and access your personal data and to request us to provide you the data in writing or electronically.

Right to correct and erase information

The data subject has the right to demand to correct any incorrect or incomplete personal data. The data subject has also the right to request to remove his/her data.

The controller also removes, corrects and completes incorrect, unnecessary, incomplete or outdated data on its own initiative when it notices such data.

Right to data portability and to restrict and object processing

The data subject has the right to request to transmit his/her data to another controller.

The data subject has the right to request to restrict processing of personal data in accordance with the conditions set out in the data protection legislation. Additionally, in case where incorrectly suspected personal information can not be corrected or removed or there is confusion about the removal request, the Company restricts access to the data.

The data subject has the right to object processing of his/her personal data for certain purposes.

How to exercise the rights of the data subjects

The requests about rights of the data subject shall be made during a personal visit or in writing or in electronic form and shall be appointed to controller mentioned in this Privacy Notice. The identity shall be confirmed prior providing the information. The request shall be answered within a reasonable time, however at the latest within one month from presenting the request and confirming the identity.

If the request is denied, the data subject shall be informed about this in writing. The Company may refuse the request (such as deleting the information) because of the statutory obligation or the statutory right of the Company.

10. Right to lodge a complaint to the supervising authority

In case you consider our processing activities of your Personal data to be inconsistent with the General Data Protection Regulation (GDPR) (EU) 2016/679, you have the right to complain to the local data protection supervisory authority.

The office of the Data Protection Ombudsman

Office address: Ratapihantie 9, 6. krs, 00520 Helsinki

Postal address: PL 800, 00521 Helsinki

Email: tietosuoja@om.fi

Phone number: 029 56 66700

Fax: 029 56 66735

11. Changes to the Privacy Notice

The Company might have to change this Privacy Notice if necessary. The changes might also be based on the amendment of the data protection legislation. We recommend reviewing the content of the Privacy Notice regularly. The data subject will be notified about the essential changes.