

## Kamux - Privacy policy for the register of General Meetings

*Updated April 8, 2025*

This Privacy Policy explains how we at Kamux process personal data in the register of General Meetings.

**Controller:** Kamux Corporation (business ID 2442327-8)

**Contact information for data protection matters**

As a data subject, you can contact us using the following contact details:

Kamux Corporation / Data protection issues

Parolantie 66, 13130 Hämeenlinna

**Contact details of the Data Protection Officer:** [privacy@kamux.fi](mailto:privacy@kamux.fi)

### 1. For what purposes and on what basis do we process your personal data?

The processing of personal data in the register of General Meetings is based on the legal obligation under the Companies Act to maintain a register of participants in the General Meeting and to organise the General Meetings. The purpose of the processing of personal data is the organisation of General Meetings, whereby personal data are processed for the purposes of registration, information, verification of identity and right to attend, and other meeting arrangements. In addition, the data is used for the purpose of drawing up the voting list for the General Meeting and printing the ballot papers, for the organisation of any voting and for the fulfilment of other rights and obligations provided for in the Companies Act and the company's Articles of Association.

### 2. What kind of personal data do we process and where do we collect it from?

We process the following personal data about you as a shareholder or shareholder's representative, as applicable:

- name, personal identification number/date of birth/business ID and contact details (telephone number, postal and/or e-mail address)
- information on registration and attendance at meetings and events, e.g. the time and means of registration, the recipient of the notification, information on the shareholder's representative/proxy/assistant, the number of shares and votes, the book-entry account number, the time of arrival and departure at the meeting, voting details and, where applicable, any information on the accessibility or other needs of the participant
- contact, communication and measures of a factual nature directed at the data subject
- for the technical maintenance and monitoring of the service provided by Innovatics Ltd, the service provider also stores log data on registration and voting, as well as the IP address of the service user
- the shareholder register as of the record date for the General Meeting generated by Euroclear Finland Oy, including the name, personal identification number/business ID, address and number of shares of the shareholder, and the temporary shareholder register as of the record date for the General Meeting generated by Euroclear Finland Oy, including the information of holders of nominee-registered shares registered for the General Meeting and the number of shares.

Personal data is collected from you and/or your representative and from Euroclear Finland Oy. The information provided at the time of registration will be compared with Kamux's shareholder register maintained by Euroclear Finland Oy, from which the ownership information of the registrant will be extracted. Innovatics Ltd will act as the technical implementer of the registration system for the General Meeting and any advance voting and/or voting during the meeting and record-keeping. Based on the personal data provided in connection with the registration, Innovatics Oy retrieves the number of shares of the shareholder on the record date from the list of shareholders created by Euroclear Finland Oy.

Innovatics Oy enters the voting instructions for nominee registered shareholders represented by account operators at the General Meeting into the register.

### **3. To whom do we disclose data and do we transfer data outside the EEA?**

We use Innovatics Ltd as our General Meeting registration system provider and Inderes Plc is responsible for the overall General Meeting service. In addition, other service providers can be used if necessary. The data may be shared with third parties involved in the organisation of the General Meeting who need the data for their own activities. 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.

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.

Personal data is not transferred outside the EEA by Kamux Corporation. Data processing services are mainly provided within the EEA. However, in limited cases, the subcontractors we use may provide certain support or other services where data may be processed outside the EEA, such as the exercise of a shareholder's right to speak at a general meeting remotely, where the service provider processes the shareholder's name and IP address through a US-based service. In such situations, unless the country where the data in question is transferred has obtained an adequate data protection equivalence decision from the EU Commission, other appropriate safeguards will be applied to ensure the protection of personal data, for example by applying the standard contractual clauses for the transfer of personal data to third countries set out in the European Commission Decision (available at: [https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc\\_en](https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en)).

The data may be disclosed to authorities, for example, the police, for the investigation of crimes.

### **4. How do we protect your data and how long do we keep it?**

The electronic data is collected in databases protected by firewalls, passwords and other technical means and stored in a data room that meets the requirements for the processing of personal data. Access to the register is restricted to a limited number of employees of the controller and subcontractors who need and process the data for the organisation of the General Meeting. The physical data are kept in locked premises accessible only to authorised persons.

The personal data recorded in or attached to the minutes of the General Meeting are kept as required by the Companies Act as part of the minutes for the duration of the company's activities in order to comply with legal obligations, but for at least 10 years after the end of the financial year. Other data shall be destroyed when they are no longer necessary for the preparation of the minutes or for verifying the accuracy of the information contained therein. Innovatics Ltd will keep personal data for a maximum of two years after the end of the General Meeting. Euroclear Finland Oy will keep personal data for a maximum four months after the end of the meeting.

### **5. Your rights as a data subject in relation to data processing**

You can submit a request concerning the rights of data subjects to the address mentioned in section 2. As a registered user, you have the following rights:

- Right of access and right to request rectification and erasure of data
- You have the right to be informed about the processing of your personal data, the right to inspect the data stored in the personal data file concerning you and the right to request the rectification of inaccurate data and the deletion of data.
- Right to object to and restrict processing
- You have the right to object to or request restriction of the processing of your data.
- Right to lodge a complaint with a supervisory authority
- You have the right to lodge a complaint with a supervisory authority, in particular in the EU Member State where you are habitually resident or employed or where the alleged breach has occurred, if you believe that the processing of personal data concerning you infringes the EU General Data Protection Regulation.