

## PRIVACY NOTICE – Operations as a public listed company

CapMan Plc (and the companies belonging to the same company group, hereinafter jointly referred as "CapMan") is committed to keep all personal data it collects and processes in safe and secure and to inform the data subjects promptly on all its data processing activities and on the rights which data subjects have.

This Privacy Notice is one of the CapMan's 4 public Privacy Notice, it answers the following questions:

- *What kind of personal data does CapMan collect and process?*
- *Why does CapMan collect and process the personal data?*
- *What are CapMan's information sources?*
- *How and with who may the personal data be shared?*
- *How long is the retention time?*
- *What are the rights of the Data Subject?*
- *Who to contact?*
- *How does CapMan secure the personal data?*

This Privacy Notice regards CapMan's operations as a public listed company and it informs about processing of personal data by CapMan. Please note that the data controller within CapMan may also be one of CapMan's subsidiaries the Data Subject has the relationship with.

In this Privacy Notice, the data subjects which are hereinafter jointly referred as "**Data Subjects**" may be:

- CapMan Board members and their closely associated persons as defined in the Market Abuse Regulation (596-2014, "MAR");
- Persons added into insider list and market sounding documentation maintained by CapMan under MAR;
- Media representatives, market analysts, investor representatives;
- CapMan shareholders and participants of CapMan Annual General Meeting;
- Participants of the events organized by CapMan.

### 1. What kind of personal data does CapMan collect and process?

#### ***Information related to communication***

The register includes basic contact information on all data subjects such as name, position, title, address, email address, telephone number, employer data and participation details of the events organized by CapMan, dietary restrictions and food allergies, and given consents and prohibitions for purposes of processing personal data.



### ***Information related to identification and legal requirements***

The register may also contain another personal data that CapMan is obliged to collect under mandatory legislation. This information includes but is not limited to following: date of birth, social security number, citizenship, residence.

## **2. Why does CapMan collect and process the personal data?**

### ***Legal obligations***

In regards of personal data regarding the persons whose contact details have been collected and processed under Market Abuse Regulation or Finnish Act on Limited Liability Companies the main purpose is to conduct its obligations under the mandatory legislation. The personal data of CapMan Board members and managers may also be processes for informing them on their duties or sharing company related information with them.

### ***Communication and marketing***

CapMan may also processes the data for contacting, maintaining, developing and updating its relationships by inviting media and investors representatives, market analysts and its shareholders to events. Processing for this purpose is based on a consent given by the Data Subject or on contract made between the Data Subject and CapMan.

### ***Development of business operations***

Personal data may be used for development of business operations. Personal data may be processed in order to analyse the business relationship or to enhance the quality of the products and services. General visitor information of our website is tracked, and this information may be generalized, and this used to analyse the usage of the website and to develop the website in the future. The basis for the processing is CapMan's legitimate interest develop its operations and enhance the quality of the services provided to Data Subjects.

### ***No other purposes***

CapMan does not process the collected personal data for other purposes without informing the Data Subject in advance on that other purpose. The collected data is not processed for automated decision-making (including profiling).



### 3. What are CapMan's information sources?

Personal data is mainly collected from the Data Subject itself or from their employer entity.

Personal data can be also collected from publicly available or other sources such as official registers maintained by Patent and Registration Offices, the National Bureaus of Investigation and the Finnish Business Information System (YTJ). CapMan may also collect information from the registers of credit rating bureaus such as Suomen Asiakastieto Oy. The information sources may vary depending the home country and the citizenship of the Data Subject.

### 4. How and with who can the personal data be shared?

CapMan may share the personal data with others such as the other companies of the CapMan Group, authorities, suppliers and service providers, who may, depending the situation in question, act as a data processor or become as a controller of the personal data.

Data can be shared if it is necessary for processing the personal data systematically and effectively or for complying with legal obligations, protecting CapMan's and/or Data Subjects' safety or the safety of others, investigating fraud, or responding to a government request.

The personal data can also be shared with:

- **trusted service providers**, for the purposes of systematic and organised handling of personal data e.g. IT service providers, IR & Communication consultants or Euroclear Finland Oy. However, at all times, these trusted service providers act on CapMan's behalf and CapMan is responsible for processing of personal data;
- **competent public authorities** when permitted or required by law to comply with currently valid law or a request is made by a competent authority having legal right to access to the information.

#### **Transfers to third countries**

Personal data may also be transferred to countries outside EU or EEA ("third countries") only in special occasions and when EU Commission has assessed that the level of data protection is adequate in the target country, necessary standard contractual clauses are in place to safeguard the transfer and/or it is specifically agreed upon the transfer with the Data Subject.

As CapMan operates also in Russia and, for this reason, certain personal data can be transferred to CapMan Russia team.



## 5. How long is the retention time?

The basic rules for retention are that the personal data is retained only for as long as necessary to fulfill the purpose of processing or as long as it is required by law.

**Basic personal data** will be retained only as long as necessary to manage the business relationship or other interaction with the Data Subject. The data will be deleted after a reasonable period of time has lapsed from last contact between the Data Subject and CapMan.

**Personal data collected under mandatory legislation** purposes will be retained as long as required by law, for example information collected for the purposes of MAR (5 years) and bookkeeping or accounting (10 years from the end of the accounting year).

## 6. What are the rights of the Data Subject?

A Data Subject is entitled to have access to personal data concerning him or her in the register and to request to correct, update or removal of personal data at any time. To the extent required by applicable data protection law, a Data Subject has a right to object or restrict data processing and request data portability, i.e. the right to receive the personal data in a structured, commonly used machine-readable format and transmit the personal data to another controller.

Data Subject should pay attention that certain information is strictly necessary for the performance of a contract or for compliance with a legal obligation of CapMan which may restrict Data Subject's rights listed above. In case the data processing is based on the consent given by the Data Subject, the Data Subject may at any time contact CapMan and cancel the consent for processing personal data, e.g. opt-out of receiving marketing messages.

## 7. Who to contact?

### **Controller and Controller's representative**

Name: CapMan Plc

Business ID: 0922445-7

Address: Ludviginkatu 6, 00130 Helsinki,  
Finland

Phone: +358 207 207 500

Name: Antti Kiviluoto

Title: IT Director

Email: [antti.kiviluoto@capman.com](mailto:antti.kiviluoto@capman.com)

Phone: +358 207 207 564



***Competent authority***

If the Data Subject finds violation to his or her legal rights, he or she has the right to file a complaint with the national Data Protection Authority or another Data Protection Authority within the European Union or the European Economic area.

The Data Protection Ombudsman acts as the supervising authority in Finland. You can find the contact information of the Data Protection Ombudsman through this [link](#). Please send any requests regarding the above-mentioned rights to the contact person at CapMan whose contact details can be found above.

CapMan