

PRIVACY NOTICE – ANNUAL GENERAL MEETING ATTENDANCE LIST

	The Finnish Data Protection Act (1050/2018)	Date of drafting 4 February 2020
Controller	Name (Business Identity Code) CapMan Plc (0922445-7)	
	Address Ludviginkatu 6, 00130 Helsinki, Finland	
	Other contact information (e.g. telephone during office hours, e-mail address) Tel. + 358 40 590 1043	
The person in charge and/or contact person	Name Tiina Halmesmäki, General Counsel	
	Address Ludviginkatu 6, 00130 Helsinki, Finland	
	Other contact information (e.g. telephone during office hours, e-mail address) Tel. + 358 40 590 1043, agm@capman.com	
Name of the register	Registration for the Annual General Meeting 2020	
Purpose and legal basis for processing of personal data	<p>Personal data is collected and processed when a person registers for the Annual General Meeting of CapMan Plc ("CapMan"). Personal information is required for verification of the person's identity and his or her right to attend the general meeting.</p> <p>Data will only be used for printing out the list of participants in the general meeting, the list of votes, and the ballots and to organize a vote if needed. A list of participants in the meeting will be appended to the minutes of the general meeting, compiled on the basis of this register. The list of participants will not include other personal data than the names of the shareholders and of any agents or assistants, as well as the number of shares and votes.</p> <p>The processing of personal data is based on the fulfillment of CapMan's statutory obligations.</p>	
Data subject categories	The shareholders of CapMan who have registered their attendance for CapMan's Annual General Meeting 2020	
Collected data	In connection with the registration, the following data can be collected: name, personal identification number or business identity code, address, telephone number, e-mail address, book-entry account number, number of shares and the name of a possible assistant or proxy representative and the personal identification number of a proxy representative.	
Regular sources of data	<p>When a shareholder registers for the general meeting, he or she enters information about him- or herself.</p> <p>When a shareholder registers electronically by utilizing Euroclear Finland's electronic general meeting service, Euroclear Finland Ltd is responsible for the technical implementation of the data collection. Based on the personal identity code, the registration system compares the information given with CapMan's shareholder register, maintained by Euroclear Finland Ltd, and picks the ownership data of the registering shareholder from the shareholders' register.</p> <p>When a shareholder registers via email or mail, an employee of the controller enters the registration data into the system maintained by Euroclear Finland Ltd which compares the data entered with the data in the shareholders' register for the company maintained by</p>	

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	<p>Euroclear Finland Ltd and selects the person's ownership information from the shareholders' register.</p> <p>When granting an authorisation, the shareholder also enters the required personal data on the person authorised.</p>
Processors and recipients of personal data	<p>All the companies belonging to the CapMan Group, can process personal data according to applicable data protection legislation. The personnel involved with the processing are committed to confidentiality obligations.</p> <p>The shareholders' register is technically implemented and maintained by Euroclear Finland Ltd on behalf of CapMan. Due to this, some of the data is transferred to the servers of external service providers to the extent necessary for data processing. In an effort to ensure a sufficient level of protection of personal data CapMan has concluded a data protection agreement with the service provider.</p>
Transfer of data to countries outside the European Union or European Economic Area	<p>Personal data may be processed outside the EU and EEA by the subcontractors and consultants of Euroclear Finland Ltd. The processing of personal data is based on an agreement between Euroclear Finland Ltd and its subcontractors and consultants which includes appropriate data transfer clauses to protect personal data.</p>
Principles for security of the data register	<p>The technical implementation and maintenance of the register is concluded by Euroclear Finland Ltd. Communication from the user's browser to Euroclear Finland Ltd's server is SSL encrypted. The site has been implemented with technical protection ensuring that the data entered remains unchanged and is only accessible to those entitled. Manually processed personal data is stored in a space that only authorised persons have access to.</p>
Data retention period	<p>Personal data entered in or attached to the minutes of the general meeting shall be retained as required by the Limited Liability Companies Act. Other data will be destroyed when it is no longer necessary for preparation of the minutes of the general meeting or for verifying the accuracy of the data contained therein.</p>
Rights of the data subject	<p>A data subject is entitled to have access to personal data concerning him or her in the register and to request the correction, update or removal of personal data at any time. To the extent required by applicable data protection legislation, 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.</p> <p>Shareholders have the right of access to the data stored on them in the register of shareholders of CapMan maintained by Euroclear Finland Ltd. A shareholder who wishes to have access to the registration data on him or her shall make a request to this effect to the person in charge of the controller's register mentioned above, through a personally signed letter or by visiting the controller's office in person.</p>
Other Rights	<p>If the data subject finds a 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.</p> <p>The Data Protection Ombudsman acts as the supervising authority in Finland. The contact information of the Data Protection Ombudsman is available through this link. Please send any requests regarding the above-mentioned rights to the contact person at CapMan whose contact details are stated above.</p>