

## Privacy Statement

This Privacy Statement describes the processing of personal data related to Revenio Group Corporations's General Meeting.

Updated on February 20, 2023.

### 1. Controller and contact details

Name Revenio Group Corporation  
Address Äyritie 22, 01510 Vantaa, Finland  
Business ID 1700625-7  
Name of the person Robin Pulkkinen  
Contact details [robin.pulkkinen@revenio.fi](mailto:robin.pulkkinen@revenio.fi)

### 2. Name of the register

Revenio Group Corporation's General Meeting Register.

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

The purpose of the processing of personal data is to enable the organization of the Controller's General Meeting in accordance with the legislation.

Personal data is only processed for purposes necessary for the organization of the General Meeting, such as for the verification of the identity of the people registering for the meeting and checking their rights to participate, preparing the list of participants, votes and ballots, for organizing the vote and for managing the preliminary questions and requests concerning the opportunity to speak.

The technical implementation of the General Meeting's registration system and advance voting is carried out by Innovatics Ltd. The shareholder register is maintained by Euroclear Finland Ltd.

The processing of personal data is based on the Controller's statutory obligations.

### 4. Processed personal data

The processed personal data include the shareholder's or their possible representative's name, social security number and/or business ID, address, contact details, number of shares and votes, voting information, authentication method, grounds for representation and registration date as well as possible information about the assistant, power of attorney, preliminary questions and other additional information possibly provided in connection with the registration. The time when the participant arrived to the meeting and left the meeting is also recorded. In addition, log information on the registration and voting as well as the user's IP address are recorded for the service's technical maintenance and monitoring purposes.

The register includes the shareholder register generated on the record date for the General Meeting by Euroclear Finland, which includes, among other things, the name, social security number/business ID, address and number of shares of the shareholder.

The register includes the temporary shareholder register generated for the General Meeting by Euroclear Finland, which includes information about the nominee registered shareholders who have registered for the General Meeting and their number of shares.

## **5. Regular data sources**

Personal data is mainly collected from the Data Subjects themselves or their representative in connection with the General Meeting registration. When registering through email, mail or telephone, the Controller or Innovatics Ltd will enter the personal details and preliminary votes of the registering person in the register.

On the basis of the personal data provided in connection with the registration, Innovatics Ltd retrieves the shareholder's number of shares from the shareholder register generated on the record date for the General Meeting by Euroclear Finland.

Innovatics Ltd enters the voting instructions for the nominee registered shareholders represented in the General Meeting by account operators in the register.

## **6. Disclosure of personal data**

The list of participants and voting summaries are prepared for the meeting on the basis of the register information, and they will be attached to the minutes of the General Meeting.

The shareholder register, which includes the shareholder's name, municipality and number of shares and votes on the record date, is available in the General Meeting in accordance with the Limited Liability Companies Act. The shareholder register also includes the information of the nominee registered shareholders who have been temporarily registered in the shareholder register for the General Meeting.

## **7. Transfer of data to third parties and outside the EU and EEA**

Data included in the register can be shared with third parties which participate in the organization of the General Meeting and require the data included in the register for their own operations. Data is not disclosed for commercial purposes.

SMS messages sent to the registered people are sent through a Swiss service. Otherwise, personal data are not disclosed or transferred outside the EU or EEA.

## **8. Register protection principles**

Physical material is stored in a locked space which is accessible only to authorized persons.

Electronic material is stored in a server room which complies with the requirements set for the processing of personal data. The telecommunications link between the user's browser and the server is encrypted. Only a restricted group of the Controller's and subcontractor's employees who need the data and process information related to the organization of the General Meeting have access to the register.

## **9. Retention and erasure of personal data**

Innovatics Ltd retains the personal data for a maximum of one (1) year after the end of the General Meeting.

Euroclear Finland Ltd retains the personal data for a maximum of four (4) months after the end of the General Meeting.

The minutes of the General Meeting and the attached list of votes are permanently retained. It includes the names of the shareholders who participated in the General Meeting, the names of possible proxy representatives and assistants, number of shares and votes as well as ballot numbers.

Other data are erased when they are no longer needed to prepare the minutes or confirm their correctness.

## **10. Rights of Data Subjects**

Data Subjects have the right to access their data recorded in the register. Data Subjects have the right to request the rectification, erasure and completion of their data. Possible requests must be submitted in writing to the contact person designated above in section 1.

Data Subjects have the right to lodge a complaint with the Data Protection Ombudsman if they have complaints about the processing. The instructions for this are available on the Data Protection Ombudsman's website at <https://tietosuoja.fi/en/home>.