

## Spinnova Oyj Data Protection Notice – Annual General Meeting

This data protection notice describes the personal data processing related to Spinnova Plc's Annual General Meeting.

### 1. Register Controller and Contact Details

Spinnova Oyj  
Palokärjentie 2-4,  
40320 Jyväskylä  
Business ID: 2653299-6

Contact Person:  
Lasse Holopainen  
General Counsel  
+358 40 912 3972  
lasse.holopainen@spinnova.fi

### 2. Name of the register

Spinnova's Annual General Meeting register

### 3. Purpose and legal basis for processing of Personal Data

The purpose of processing of personal data is to enable the legal arrangement of the controller's annual general meeting on 5 May 2022.

The personal data is used only for purposes necessary to organize the Annual General Meeting, such as verifying of the shareholders' identity and his/her right to attend the Annual General Meeting, preparing a list of participants, a list of votes and ballots, as well as for organizing any polling, managing questions asked in advance and controlling requests to speak.

Innovatics Ltd is the technical service provider of the registration and advance voting system. The shareholder's register is maintained by Euroclear Finland Oy.

The legal basis of the processing of personal data is the legal obligations of the data controller. The provision of personal data as specified in this Data Protection Notice is necessary in order for Spinnova to fulfil its legal obligations. Should the data subject not provide his/her personal data to Spinnova as described in this Data Protection Notice, the sending and handling of the shareholder's registration is not possible, which means that the data subject cannot participate in the Annual General Meeting.

### 4. Processed personal data

The processed personal data consists of shareholder's and his/her representative's (if any) name, personal identity number and/or business ID, address, contact details, number of shares and votes, voting information, method of identification, basis of representation, date of registration, and information on assistant (if any), proxy, questions asked in advance and any other additional information provided during the registration process. In addition, the participants' time of arrival and exit will be recorded. For the technical maintenance and monitoring of the service also the log information on registration and voting as well as the IP-address of the user will be recorded.

Register contains Euroclear Finland's shareholders' register at the record date, which contains e.g. the name of the shareholder, business or personal identification number, address and the number of shares.

Register contains Euroclear Finland's temporary list of nominee registered shareholders, which have registered to participate in the Annual General Meeting, and the number of their shares.

#### **5. Regular sources of data**

Personal data is mainly collected from the shareholder himself/herself or from his/her representative in connection with the registration. When registering via email, mail, or telephone, the personal data and advance votes are entered in the register by Spinnova or Innovatics Ltd.

The registration system retrieves the shareholder's data based on the given personal data from the shareholders' register on the record date of the Annual General Meeting maintained by Euroclear Finland Oy.

Innovatics Ltd enters the information about the voting instructions of holders of nominee registered shares.

#### **6. Disclosures and transfers of personal data**

Based on the register, a participant list and voting summaries are collected and attached to the minutes of the meeting.

In accordance with the Finnish Companies Act, a shareholder's register on the record date, which contains name of the shareholder, municipality as well as number of shares and votes will be kept available at the Annual General Meeting. Register also contains information on the temporary listed nominee registered shareholders.

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

Spinnova may use service providers in the processing of personal data described in this Data Protection Notice and may transfer personal data to such service providers to the extent necessary in order for them to provide the services agreed to Spinnova. Personal data will not be transferred for commercial purposes.

Text messages for persons registered to Annual General Meeting will be sent via Swiss service.

#### **8. Protection of the personal data**

Non-digital data is kept in a locked space and is available only for authorized persons.

Digital data is stored in a data center that meets the requirements for processing personal data. Data connection between the user's browser and the server is encrypted. Access to the system is limited to those employees of Spinnova and its subcontractors who need and process the information for arranging the Annual General Meeting.

#### **9. Retention and deletion of the personal data**

Innovatics Ltd stores the personal data for a maximum of one year after the Annual General Meeting.

Euroclear Finland stores the data for a maximum of four months.

Personal data entered into or attached to the minutes of the annual general meeting will be retained as defined in the Finnish Limited Liability Companies Act (624/2006) for an indefinite period of time. Other personal data will be destroyed in a secure manner after they are no longer necessary for the preparation of the minutes or the verification of its validity.

#### **10. Rights of the data subject**

The data subject has the right to obtain access to personal data concerning the data subject. The data subject has the right to rectification, deletion or complementation of the data stored on the data subject. The requests shall be directed to the contact person mentioned in section 1 above.

The data subject has the right to lodge a complaint with the competent supervisory authority if he/she has any remarks regarding the processing. The related instructions of the Data Protection Ombudsman can be found on the website of the Data Protection Ombudsman at <https://tietosuoja.fi/en/home>.