

PRIVACY POLICY

Registrations for the Annual General Meeting of Adapteo Plc

1. Controller	Adapteo Plc Äyritie 12 B 01510 Vantaa Business ID: 2982221-9
2. Contact person	Erik Skånsberg Adapteo Plc Phone: +46 8 590 994 40 E-mail: erik.skansberg@adapteo.com
3. The purpose and legal basis of the personal data processing	<p>The personal data are collected for the purposes of the arranging of and the registration for the Annual General Meeting (“AGM”) of Adapteo Plc. The personal data are processed for the verification of the identities and shares of the registrants and to confirm that they are eligible to participate in the AGM. The personal data are also processed for other purposes related to the arranging of the AGM, such as for drawing up the list of votes and participants and ballots and for organising a possible voting. Participation in the AGM requires the disclosure of personal data as set forth in this privacy policy.</p> <p>The list of votes and participants will be attached to the minutes of the AGM. The list includes the names of the shareholders participating in the meeting, the names of possible representatives and assistants, and the amounts of shares and votes. The shareholders’ register of Adapteo Plc, containing shareholders’ names, amounts of shares and votes, among other things, will also be held available in the AGM.</p> <p>The processing of the personal data set forth in this privacy policy is necessary for Adapteo Plc to fulfil its legal obligations.</p>
4. The personal data to be processed	<p>Only such personal data of the shareholder, his/her possible representative and assistant are processed, that are necessary for the purposes set forth above. The personal data processed include the name, address, phone number, e-mail address, personal identity number, business ID, number of book-entry account, number of shares and votes as well as the information on the possible representative and/or assistant.</p> <p>If a shareholder registers online, Euroclear Finland Ltd operates as the technical service provider for the collection of personal data. The number of the book-entry account is only used for the identification in the system of Euroclear Finland Ltd and it is not disclosed to Adapteo Plc.</p>
5. Retention period for the personal data	<p>Euroclear Finland Ltd will store the personal data for the period of four months as of the AGM.</p> <p>Adapteo Plc will store the minutes of the AGM and the attached list of votes and participants that includes the names of the shareholders, the numbers of the voting ballots and the amounts of shares and votes. The minutes and its appendices are stored as long as the company operates in order for Adapteo Plc to fulfil its legal obligations.</p>

<p>6. Regular sources of information</p>	<p>The information is received during the registration directly from the shareholder himself/herself or his/her representative.</p> <p>When a shareholder registers via the registering service of Euroclear, Euroclear Finland Ltd operates as the technical service provider for the collection of the personal data. Based on the personal identity number submitted, the system compares the data given with the shareholders' register of Adapteo Plc maintained by Euroclear Finland Ltd and extracts the ownership information from the shareholders' register.</p> <p>When a shareholder registers by e-mail or mail, a representative of Adapteo Plc will register the data submitted by the registrant manually into the register system maintained by Euroclear Finland Ltd, which will compare the given data to the data in the shareholders' register of Adapteo Plc maintained by Euroclear Finland Ltd, and will extract the ownership information from the shareholders' register.</p> <p>When a shareholder makes an authorisation, he/she shall also enter the necessary personal data of the representative.</p>
<p>7. Recipients of the personal data</p>	<p>The personal data is not regularly disclosed to third parties. However, Adapteo Plc may use an external service provider, such as Euroclear Finland Ltd, to help process the data.</p> <p>The requirements of applicable legislation may under certain circumstances also require the disclosure of your personal information to the authorities.</p>
<p>8. Data transfers to outside of EU or the EEA</p>	<p>The personal data shall not be transferred outside of EU or the EEA.</p>
<p>9. The principles of how the personal data are secured</p>	<p>Only persons separately authorised may have access to your personal data or the right to process them.</p> <p>Euroclear Finland Ltd is responsible for the technical maintenance of the online registration site. The connection from a user's browser to the server of Euroclear Finland Ltd is encrypted with SSL technology. Only certain designated persons have access to the system.</p>
<p>10. Data subject rights</p>	<p>The data subject has a right to receive information on whether his/her personal data are being processed and if data are processed, he/she has a right to access his/her data. The data subject also has a right to ask for the data to be rectified or deleted or for the processing to be restricted within the limitations set out in and in accordance with applicable data protection legislation.</p> <p>The requests concerning exercising the rights shall be made to the contact person mention in this privacy policy. Please find the contact information of the contact person in Section 2 above.</p> <p>The data subject is entitled to lodge a complaint with a supervisory authority regarding the processing of the personal data, if he/she is dissatisfied with how his/her personal data is processed. The supervisory authority in Finland is the Data Protection Ombudsman.</p>