

PRIVACY POLICY

This privacy policy describes the processing of personal data in connection with the Extraordinary General Meeting 2021 of Adapteo Plc.

1. Data controller	Adapteo Plc (hereinafter "Adapteo") Äyritie 12 B 01510 Vantaa Finland Business ID: 2982221-9
2. Contact person	Erik Skånsberg Adapteo Plc Phone: +46 8 590 994 40 Email: erik.skansberg@adapteo.com
3. Purpose and legal basis for processing personal data	<p>Personal data is collected for purposes of the registration for the Extraordinary General Meeting 2021 of Adapteo. Personal data is processed for the verification of the identities and share ownership of the registrants, as well as to confirm that they are eligible to participate in the Extraordinary General Meeting. Personal data is also processed for other purposes related to arranging of the Extraordinary General Meeting, such as drawing up the list of votes and participants. Participation in the Extraordinary General Meeting 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 Extraordinary General Meeting. The list includes the names of shareholders participating in Extraordinary General Meeting, the names of possible representatives, and the number of shares and votes.</p> <p>The processing of personal data set forth in this privacy policy is necessary for Adapteo to fulfil its legal obligations set out in, i.e. the Companies Act (624/2006, as amended) and the Securities Markets Act (746/2012, as amended).</p> <p>Providing information is a statutory requirement for attending the Extraordinary General Meeting. Without such information it is not possible, in principle, to exercise the rights attached to the shares.</p>
4. Personal data to be processed	<p>Adapteo operates as the technical service provider for the collection of personal data in connection with the shareholders' registration.</p> <p>Only such personal data of the shareholder and his/her possible representative are processed that are necessary for the abovementioned purposes. Personal data to be collected includes:</p> <ul style="list-style-type: none"> • name • personal identity code • contact details (address, phone number and email address)

	<ul style="list-style-type: none"> • possible shareholder represented • possible business ID • number of shares and votes • information on the possible representative.
5. Retention period for personal data	Adapteo will store the minutes of the Extraordinary General Meeting and the attached list of votes and participants, which includes the name of the shareholder, the name of the possible representative and the number of shares and votes. The minutes and its appendices are stored as long as Adapteo operates in order for Adapteo to fulfil its statutory obligations.
6. Regular sources of information	<p>The information is received during the registration directly from the shareholder or the shareholder's representative.</p> <p>When a shareholder makes an authorisation, the shareholder shall also enter the necessary personal data of the representative.</p>
7. Recipients of personal data	<p>Pursuant to statutory requirements, the list of participants of the Extraordinary General Meeting and the summaries of the votings shall be attached to the minutes of the Extraordinary General Meeting. The minutes of the Extraordinary General Meeting will be published on Adapteo's website.</p> <p>Adapteo uses an external service provider to assist in data processing. Euroclear as a service provider maintains the shareholders' register on behalf of Adapteo, and information is transferred to Euroclear to the extent is necessary for maintaining the shareholders' register and organising of the Extraordinary General Meeting.</p> <p>The requirements of applicable legislation may under certain circumstances also require the disclosure of personal information to the authorities.</p>
8. Data transfers to outside of the EU or the European Economic Area	Adapteo does not independently transfer personal data outside the European Union or the European Economic Area.
9. Data protection principles	<p>Adapteo has implemented technical and organisational measures to ensure the security of the data, including restricting access so that only separately authorised persons have the right to process personal data.</p> <p>Euroclear is responsible for the technical maintenance of the shareholder register. The connection from a user's browser to the server of Euroclear is encrypted with SSL technology. Only separately authorised persons have access to the system.</p>
10. Data subject rights	The data subject has a right to receive information on whether his/her personal data are being processed. 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

	<p>legislation. However, Adapteo may be under a legal obligation to retain certain personal data despite of a request of deletion.</p> <p>The requests concerning exercising the rights shall be made to the contact person mention in this privacy policy. The request may be presented in free-form using the contact details set out in section 2 of this privacy policy.</p> <p>The data subject is also entitled to lodge a complaint with the competent supervisory authority regarding the processing of his/her personal data, if he/she considers that data protection regulations have not been complied with in the processing of his/her personal data. In Finland, the supervisory authority is the Finnish Data Protection Ombudsman (www.tietosuoja.fi).</p>
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