

## PRIVACY POLICY

This privacy policy describes the processing of personal data in connection with the Annual 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 and the advance voting at the Annual General Meeting 2021 of Adapteo. Personal data is processed for the verification of the identities and share ownership of the registrants and advance voters, as well as to confirm that they are eligible to participate in the Annual General Meeting. Personal data is also processed for other purposes related to arranging of the Annual General Meeting, such as drawing up the list of votes and participants, and for organising the advance voting. Participation in the Annual General Meeting as well as the advance voting 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 Annual General Meeting. The list includes the names of shareholders participating in Annual General Meeting by voting in advance, 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 Annual 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	Euroclear Finland Oy (hereinafter "Euroclear") operates as the technical service provider for the collection of personal data in connection with the shareholders' online registration and advance voting. For more information on Euroclear's privacy policy, please visit <a href="https://www.euroclear.com/legal/en/privacy.html">https://www.euroclear.com/legal/en/privacy.html</a> .

	<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"> <li>• name</li> <li>• personal identity code</li> <li>• information relating to the advance voting (advance form)</li> <li>• contact details (address, phone number and email address)</li> <li>• possible shareholder represented</li> <li>• possible business ID</li> <li>• book-entry account number</li> <li>• number of shares and votes</li> <li>• information on the possible representative.</li> </ul> <p>The book-entry account number is used only for identification in the system of Euroclear and it is not disclosed to Adapteo.</p>
<p>5. Retention period for personal data</p>	<p>Adapteo will store the minutes of the Annual 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.</p>
<p>6. Regular sources of information</p>	<p>The information is received during the registration directly from the shareholder or the shareholder's representative.</p> <p>When a shareholder registers and votes in advance via the registering service of Euroclear, Euroclear operates as the technical service provider for the collection of personal data. Based on the personal identity number submitted, the system compares the data given with the shareholders' register of Adapteo maintained by Euroclear and extracts the shareholder's ownership information from the shareholders' register.</p> <p>When a shareholder registers by e-mail or mail, a representative of Adapteo will register the data submitted by the registrant manually into the register system maintained by Euroclear, which will compare the given data to the data in the shareholders' register of Adapteo maintained by Euroclear, and will extract the registrant's ownership information from the shareholders' register.</p> <p>When a shareholder makes an authorisation, the shareholder shall also enter the necessary personal data of the representative.</p>
<p>7. Recipients of personal data</p>	<p>Pursuant to statutory requirements, the list of participants of the Annual General Meeting and the summaries of the votings shall be attached to the minutes of the Annual General Meeting. The minutes of the Annual 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</p>

	<p>necessary for maintaining the shareholders' register and organising of the Annual 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	<p>Adapteo does not independently transfer personal data outside the European Union or the European Economic Area.</p>
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 registration system and the 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	<p>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 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 (<a href="http://www.tietosuoja.fi">www.tietosuoja.fi</a>).</p>