

## PRIVACY POLICY – ANNUAL SHAREHOLDERS' MEETING General Data Protection Regulation art. 12-14 Policy created: March 11, 2021

| 1. Controller                                     | Aspo Plc  |
|---|---|
| 1. Controller                                     | Mikonkatu 13 A, PL 499                              |
|   | 00101 Helsinki, Finland                             |
|   | Tel. +358 9 5211                                    |
| 2. Contact person                                 | Johanna Suhonen / Aspo Plc                          |
| 2. contact person                                 | Mikonkatu 13 A, P.O. Box 499                        |
|   | 00101 Helsinki, Finland                             |
|   | Tel. +358 9 521 4100                                |
|   | johanna.suhonen@aspo.com                            |
| 3. Purpose for and lawful basis of the processing | The processing of personal data relates to Annual   |
| of personal data                                  | Shareholders' Meeting of Aspo Plc to be held on     |
| or personal data                                  | April 8, 2021.                                      |
|   | 7.01.11 6) 2021.                                    |
|   | Personal data of the shareholders, their assistants |
|   | and proxy representatives are processed for the     |
|   | purposes of organizing (including organizing the    |
|   | registering, advance voting and use of right to     |
|   | speak) as well as appropriately documenting the     |
|   | Annual Shareholders' Meeting. In case a             |
|   | shareholder will follow the meeting through         |
|   | remote access, personal data are processed for the  |
|   | purposes of providing a possibility to follow the   |
|   | meeting in a trustworthy manner.                    |
|   | ,   |
|   | The processing of personal data is based on the     |
|   | obligations imposed on the controller regarding the |
|   | Shareholders' Meeting in the Limited Liability      |
|   | Companies Act and other legislation, and on the     |
|   | legitimate interests arising to the controller from |
|   | organizing the Shareholders' Meeting.               |
| 4. Personal data to be processed and data sources | The personal data are as a rule obtained from each  |
| •   | shareholder registering to the Shareholders'        |
|   | Meeting and/or from a party acting on their behalf, |
|   | as well as from each shareholder registering to     |
|   | follow the Shareholders' Meeting through remote     |
|   | access.   |
|   |   |
|   | When the shareholder registers for the              |
|   | Shareholders' Meeting the following personal data   |
|   | will be collected:                                  |
|   |   |
|   | • name  |
|   | personal ID   |
|   | home address  |
|   | book-entry account number                           |
|   | Business ID   |
|   | email address                                       |
|   | telephone number                                    |
|   | '   |



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|  | In addition will be collected name of a possible accompanying assistant or proxy representative and the personal ID of the proxy representative.  |
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|  | When the shareholder registers to follow the Shareholders' Meeting through remote access the following personal data will be collected:   |
|  | • name  |
|  | personal ID   |
|  | home address     hould attract account power host   |
|  | <ul><li>book-entry account number</li><li>Business ID</li></ul>   |
|  | email address   |
|  | telephone number  |
|  |   |
| 5. Storage of personal data                    | The controller enters the personal data of the registrant / person following the meeting through remote access to the system maintained by Euroclear Finland Oy. The system compares the provided personal ID provided in Aspo Plc's shareholder register maintained by Euroclear Finland Oy, and selects the ownership information of the registrant / person following the meeting through remote access from the shareholder register. Participation in the Shareholders' Meeting requires the disclosure of personal data as set forth in this privacy policy.  The personal data shall be stored as long as necessary to execute the Shareholders' Meeting and to comply with the retention periods laid down in law. For instance, the provisions of the Limited Liability Companies Act on limitation require the controller to store the personal data related to the |
|  | Shareholders' Meeting for three months after the  |
|  | end of the Shareholders' Meeting.   |
|  | The retention periods mentioned herein have no effect on the retention of similar personal data for other purposes, for example as part of a list of shareholders or nominee register.  |
| 6. Recipients of data and the transfer of data | The personal data shall be transferred Euroclear  |
| outside the EU or the EEA                      | Finland Oy that maintains the shareholder register for and on behalf of the controller. Euroclear   |
|  | Finland Oy uses external service providers for  |
|  | system maintenance. The service providers'  |
|  | partners may operate outside the EU or the EEA.   |
|  | The secure and appropriate processing of personal   |



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| account the standa<br>European Commiss<br>GDPR, or by other<br>In case a sharehold<br>Meeting though re<br>shall be transferred<br>service provider th<br>for and on behalf of<br>In addition, the dat<br>necessary also to o  | an agreement, which takes into ard contractual clauses of the sion in accordance with the appropriate safeguards. der follows the Shareholders' emote access, the personal data d as necessary for third party hat manages the remote access of the controller. |
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| GDPR, or by other In case a sharehold Meeting though re shall be transferred service provider the for and on behalf of the control of the con | appropriate safeguards. der follows the Shareholders' emote access, the personal data d as necessary for third party nat manages the remote access of the controller.  ta are transferred when  |
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| ,  | ther trustworthy service  |
| providers acting to  | r and on behalf of the controller.  |
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| Otherwise than sno   | ecifically stated above, personal   |
| · ·  | ansferred outside of the EU or  |
| the EEA.   | ansierred outside of the 20 of  |
|  | has the following rights subject  |
|  | lata protection laws:   |
|  | t to request from the controller  |
| · · ·  | o and rectification or erasure of   |
|  |   |
|  | n personal data;  |
|  | t to request for restriction of   |
| ·  | ng concerning themselves and to   |
| object to  | processing.   |
| Data Subject's wish  | hing to use their rights shall  |
|  | hing to use their rights shall  |
|  | st personally to the Aspo Plc's   |
| contact person by  |   |
|  | <u>Paspo.com</u> or in writing to Aspo  |
| Pic, P.O. Box 499, 0   | 00101 Helsinki, Finland.  |
| If the Data Subject  | fools that their personal data  |
|  | feels that their personal data  |
|  | essed appropriately, he/she has   |
|  | a complaint with the Finnish  |
|  | mbudsman or other competent   |
| ·  | thority within the European   |
| Union.   |   |