

PRIVACY POLICY – ANNUAL SHAREHOLDERS' MEETING General Data Protection Regulation art. 12-14 Policy created: March 9, 2022

1. Controller	Aspo Plc
1. Controller	Mikonkatu 13 A, PL 499
	00101 Helsinki, Finland
	Tel. +358 9 5211
2. Contact person	Johanna Ahtiainen / Aspo Plc
2. Contact person	Mikonkatu 13 A, P.O. Box 499
	00101 Helsinki, Finland
	Tel. +358 9 521 4100
	johanna.ahtiainen@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 6, 2022.
	Αρτιι 0, 2022.
	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
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	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
n i cissinai data to de processed and data sources	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. When the shareholder registers to follow the Shareholders' Meeting through remote access the following personal data will be collected:
	 name personal ID home address book-entry account number Business ID email address telephone number
	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.
5. Storage of personal data	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 outside the EU or the EEA	The personal data shall be transferred Euroclear 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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	data is ensured by an agreement, which takes into account the standard contractual clauses of the European Commission in accordance with the GDPR, or by other appropriate safeguards. In case a shareholder follows the Shareholders' Meeting though remote access, the personal data shall be transferred as necessary for third party service provider that manages the remote access for and on behalf of the controller. In addition, the data are transferred when necessary also to other trustworthy service providers acting for and on behalf of the controller. Otherwise than specifically stated above, personal data will not be transferred outside of the EU or the EEA.
7. Data Subject's rights	Each Data Subject has the following rights subject to the applicable data protection laws: (i) The right to request from the controller access to and rectification or erasure of their own personal data; (ii) The right to request for restriction of processing concerning themselves and to object to processing. Data Subject's wishing to use their rights shall present the request personally to the Aspo Plc's contact person by email to: johanna.ahtiainen@aspo.com or in writing to Aspo Plc, P.O. Box 499, 00101 Helsinki, Finland. If the Data Subject feels that their personal data are not being processed appropriately, he/she has the right to lodge a complaint with the Finnish Data Protection Ombudsman or other competent data protection authority within the European Union.