

1. Controller	Aspo Plc
	Keilaranta 17, P.O. Box 70
	02151 Espoo, Finland
	Tel. +358 9 5211
2. Contact person	Markus Riikonen / Aspo Plc
	Keilaranta 17, P.O. Box 70
	02151 Espoo, Finland
	markus.riikonen@aspo.com
3. Purpose for and lawful basis of the processing of personal data	The processing of personal data relates to the Annual Shareholders' Meeting of Aspo Plc to be held on April 12, 2024. The personal data is
	collected for the purposes of arranging the Annual Shareholders' Meeting as well as to enable
	shareholders of Aspo Plc to register for and vote in
	advance in the Annual Shareholders' Meeting. A
	webcast of the Annual Shareholders' Meeting will
	be openly available to everyone (including the
	shareholders). The personal data of individuals participating via webcast will be processed only for
	the purpose of organizing the webcast and
	ensuring the technical functionality.
	Personal data is processed to verify the identity and shareholding of each registrant and their right to participate and vote in advance at the Annual Shareholders' Meeting. Furthermore, the data is used for other purposes related to the organising of the Annual Shareholders' Meeting, such as drawing up a list of participants, a voting list and ballots and for arranging potential voting and advance voting.
	The processing of personal data is based on the obligations imposed on Aspo Plc regarding the Annual Shareholders' Meeting in the Limited Liability Companies Act and other legislation. The processing of personal data in connection with and relating to following the Shareholders' Meeting through webcast is based on Aspo Plc's legitimate interest to make the Shareholders' Meeting available via webcast (online).
4. Personal data to be processed and data sources	The personal data are obtained from each
	shareholder registering to the Annual
	Shareholders' Meeting and/or from a party acting on their behalf.
	The following information will be collected and processed from the registered shareholders and



	their assistants and proxy representatives, as
	applicable:
	namepersonal ID and/or business ID
	 address
	e-mail address
	 telephone number
	 number of shares and votes
	 information related to exercising shareholder
	rights, such as questions and voting
	information
	manner of identification
	 basis of representation
	• date of registration of the shareholder and the
	possible assistant or proxy representative
	 any information about the assistant and proxy document
	documentadvance questions
	 any additional information provided in
	connection with the registration.
	The time at which an individual participating via
	webcast arrives at the webcast and departs will be
	recorded. Log information and the user's IP
	address will also be recorded for the purposes of
	the technical maintenance and monitoring of the service.
	Service.
	Participation in the Annual 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 Annual 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 Aspo Plc to store the personal data related
	to the Annual Shareholders' Meeting for three
	months after the end of the Annual Shareholders'
	Meeting. The personal data of individuals
	participating via webcast will be deleted after the
	Shareholders' Meeting has ended.
	The retention periods mentioned herein have no
	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 is disclosed to third parties that
outside the EU or the EEA	The personal data is disclosed to third parties that participate in organising the Annual Shareholders' Meeting and require access to the data in their operations or that otherwise act for and on behalf of Aspo Plc.
	The personal data is transferred to Euroclear Finland Oy that maintains the shareholder register for and on behalf of Aspo Plc. Euroclear Finland Oy uses external service providers for system maintenance that may operate outside the EU or the EEA. The security and adequacy of the processing of personal data is ensured by an agreement, which takes into account the applicable standard contractual clauses of the European Commission in accordance with the GDPR as well as other appropriate and legal safeguards.
	When an individual follows the Annual Shareholders' Meeting though the webcast, the personal data is transferred, as necessary, to the third party service provider that manages the webcast for and on behalf of Aspo Plc.
	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 receive information on whether his/her personal data are being processed, and if the data are processed, he/she has the right to request from Aspo Plc access to and rectification or erasure of their own personal data within the limitations set out in and in accordance with applicable data protection laws; (ii) The right to request for restriction of processing concerning themselves and to object to processing, insofar as the processing is based on the legitimate interests of the Aspo Plc.
	Data Subject's wishing to use their rights shall present the request personally to the Aspo Plc's contact person by email to:



markus.riikonen@aspo.com or in writing to Aspo Plc, Keilaranta 17, P.O. Box 70, 02151 Espoo Helsinki, Finland.
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 (www.tietosuoja.fi).