

<b>1. Controller</b>	<b>Aspo Plc</b> Mikonkatu 13 A, PL 499 00101 Helsinki, Finland Tel. +358 9 5211
<b>2. Contact person</b>	Johanna Ahtiainen / Aspo Plc Mikonkatu 13 A, P.O. Box 499 00101 Helsinki, Finland Tel. +358 9 521 4100 johanna.ahtiainen@aspo.com
<b>3. Purpose for and lawful basis of the processing of personal data</b>	<p>The processing of personal data relates to the Annual Shareholders’ Meeting of Aspo Plc to be held on April 4, 2023. The personal data are collected for the purposes of the 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 available to shareholders of Aspo Plc, who have registered separately for it.</p> <p>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.</p> <p>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, and on the legitimate interests arising to Aspo Plc from organizing the Annual Shareholders’ Meeting, including organizing the opportunity for shareholders to follow the meeting via webcast.</p>
<b>4. Personal data to be processed and data sources</b>	<p>The personal data are obtained from each shareholder registering to the Annual Shareholders’ Meeting and/or from a party acting on their behalf, as well as from each shareholder registering to follow the Annual Shareholders’ Meeting via webcast.</p> <p>The following information will be collected and processed from the registered shareholders and their assistants and proxy representatives, as applicable:</p>

	<ul style="list-style-type: none"> <li>• name</li> <li>• personal ID and/or business ID</li> <li>• address</li> <li>• e-mail address</li> <li>• telephone number</li> <li>• number of shares and votes</li> <li>• information related to exercising shareholder rights, such as questions and voting information</li> <li>• manner of identification</li> <li>• basis of representation</li> <li>• date of registration of the shareholder and the possible assistant or proxy representative</li> <li>• any information about the assistant and proxy document</li> <li>• advance questions</li> <li>• any additional information provided in connection with the registration.</li> </ul> <p>In addition, the time at which participants arrive at the webcast and depart will be recorded. Log information regarding the registration as well as the user’s IP address will also be recorded for the purposes of the technical maintenance and monitoring of the service.</p> <p>Participation in the Annual Shareholders’ Meeting requires the disclosure of personal data as set forth in this privacy policy.</p>
<p><b>5. Storage of personal data</b></p>	<p>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 Aspoc Plc to store the personal data related to the Annual Shareholders’ Meeting for three months after the end of the Annual Shareholders’ Meeting.</p> <p>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.</p>
<p><b>6. Recipients of data and the transfer of data outside the EU or the EEA</b></p>	<p>The personal data is disclosed to third parties that participate in organising the Annual Shareholders’ Meeting and require access to the data in their</p>

	<p>operations or that otherwise act for and on behalf of Aspo Plc.</p> <p>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.</p> <p>When a shareholder 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.</p> <p>Otherwise than specifically stated above, personal data will not be transferred outside of the EU or the EEA.</p>
<b>7. Data Subject’s rights</b>	<p>Each Data Subject has the following rights subject to the applicable data protection laws:</p> <ul style="list-style-type: none"><li>(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;</li><li>(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.</li></ul> <p>Data Subject’s wishing to use their rights shall present the request personally to the Aspo Plc’s contact person by email to: <a href="mailto:johanna.ahtiainen@aspo.com">johanna.ahtiainen@aspo.com</a> or in writing to Aspo Plc, P.O. Box 499, 00101 Helsinki, Finland.</p>

	<p>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 (<a href="http://www.tietosuoja.fi">www.tietosuoja.fi</a>).</p>
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