

<b>1. Controller</b>	<b>Aspo Plc</b> Keilaranta 17 C, P.O. Box 70 02151 Espoo, Finland Tel. +358 9 5211
<b>2. Contact person</b>	Markus Riikonen / Aspo Plc Keilaranta 17 C, P.O. Box 70 02151 Espoo, Finland markus.riikonen@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 General Meeting of Aspo Plc to be held on April 17, 2026. The personal data is collected for the purpose of arranging the Annual General Meeting as well as to enable shareholders of Aspo Plc to register for and vote in advance in the Annual General Meeting. A webcast of the Annual General 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.</p> <p>The technical implementation of the registration system, General Meeting hall bookkeeping and possible advance voting and/or possible voting during the General Meeting is carried out by Innovatics Oy. The list of shareholders is maintained by Euroclear Finland Oy. Inderes Oyj is responsible for the General Meeting service in its entirety. In addition, other service providers are used when needed.</p> <p>Personal data is mainly collected from the shareholder themselves or from their representative in connection with the registration to the General Meeting. When registering via e-mail or mail, the controller or Innovatics Oy enters the registrant's personal data and advance votes into the register.</p> <p>Based on the personal data provided in connection with the registration, Innovatics Oy retrieves the number of shares of the shareholder on the record date from the list of shareholders created by Euroclear Finland.</p> <p>Innovatics Oy enters the voting instructions for nominee registered shareholders</p>

	<p>represented by account operators at the General Meeting into the register.</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 General Meeting. Furthermore, the data is used for other purposes related to the organising of the Annual General 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 General Meeting in the Limited Liability Companies Act and other legislation. The processing of personal data in connection with and relating to following the General Meeting through webcast is based on Aspo Plc’s legitimate interest in making the General Meeting available via webcast (online).</p>
<p><b>4. Personal data to be processed and data sources</b></p>	<p>The personal data are obtained from each shareholder registering to the Annual General Meeting and/or from a party acting on their behalf.</p> <p>The following information may 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>• date of birth /personal identity code 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>• any additional information provided in connection with the registration.</li> </ul>

	<p>When participating in the General Meeting, the time of arrival and departure of each participant are recorded. 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.</p> <p>Participation in the Annual General Meeting requires that the requested personal data is provided.</p>
<b>5. Storage of personal data</b>	<p>The personal data shall be stored as long as necessary to execute the Annual General 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 General Meeting for three months after the end of the Annual General Meeting. The personal data of individuals participating via webcast will be deleted after the General Meeting has ended.</p> <p>The minutes of the General Meeting and the list of votes attached thereto are stored permanently. It includes the names of shareholders who participated in the General Meeting, the names of potential proxies and aids, the number of shares and votes, and the numbers of the voting tickets.</p> <p>Innovatics Oy stores personal data for a maximum of two years after the end of the General Meeting.</p> <p>Euroclear Finland Oy stores personal data for a maximum of four months after the end of the General 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>
<b>6. Recipients of data and the transfer of data outside the EU or the EEA</b>	<p>The personal data is disclosed to third parties that participate in organising the Annual General Meeting and require access to the data in their operations or that otherwise act for and on behalf of Aspo Plc.</p>

	<p>The personal data is transferred to the technical service provider Innovatics Oy for and on behalf of Aspo Plc. In addition, 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 an individual follows the Annual General Meeting through 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:markus.riikonen@aspo.com">markus.riikonen@aspo.com</a> or in writing to Aspo Plc, Keilaranta 17 C, P.O. Box 70, 02151 Espoo 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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