# SOLWERS

**Privacy Statement** 

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29.3.2022 Public

This Privacy Statement provides information on the processing of your personal data in relation to your registration for and participation in the Annual General Meeting of Solwers Plc.

# 1. Data processing responsible and contact details

Name	Solwers Oyj
Address	Kappelikuja 2 b, 02200 Espoo
Company ID	0720734-6
Responsible person	Olli Kuusi
Contact details	olli.kuusi(at)solwers.fi

# 2. Name of the register

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# 3. The purposes and legal grounds for data processing

The purpose of processing personal data is to enable the data controller to hold the Annual General Meeting following all corporate law requirements.

The personal data is processed solely for the proper execution of the Annual General Meeting, such as to ensure the identity and legitimacy of the participant, to compile the list of participants, voting catalogue and voting tickets, to arrange the voting, to manage the advance questions and request to speaking turns.

The technical arrangements for the register system and advance voting are implemented by Innovatics Oy. The shareholder register is maintained by Solwers Plc.

Personal data is processed on based on legal requirements of the controller.

# 4. Personal data

Relevant personal data includes the name of the shareholder or the representator of the shareholder, personal identification number and/or company identification, address, contact details, number of shares, class of shares, type of ownership of shares, type of identification, representation criteria, registration date and possible information for aide, power of attorney, advance questions and other possibly given information at registration. There will be a recording of the meeting participants' time of arrival and exit. Furthermore, there will be recording of the register log and voting as well as the user's IP address due to the technical requirements of the meeting.

Solwers Plc's Annual General Meeting register includes shareholder list as of the meeting record date, including the shareholder's name, personal identification number/company identification, address, and number of shares.

Solwers Plc Annual General Meeting's register includes temporary list of shareholders which includes information of the nominee registered shareholders and their number of shares.



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# 5. Regular informants

Personal data is collected primarily from the shareholder or the named representative in connection with the registration. Innovatics Oy or the data controller records the registered attendee's personal data and advance votes that has been made via email, postal service, or phone.

Innovatics Oy will get the amount of shares of each participating shareholder from the shareholder list at record date created by Solwers Plc.

Innovatics Oy will feed the register with the voting instructions of the representatives for the nominee registered shareholders.

#### 6. Personal data transmission

The participant list of the meeting and voting summary are formed based on the information of the register and this will be attached to the meeting minutes.

According to legal requirements, the list of shareholders is visible in the Annual General Meeting. This includes shareholders' name, municipality, the number of shares and votes according to the information of the record date. The list also includes nominee registered shareholders' information who have registered to the Annual General Meeting.

# 7. Personal data transmission to the third parties and in EU or outside European economic area

The register information can be shared to third parties who participate in the arrangements of the Annual General Meeting and therefore need the register information. The personal data is never handed over for commercial use.

SMS is delivered through a Swiss service to the registered person. Other than that, no information is handed over or transmitted outside of EU or European economic area.

#### 8. The basis of the register protection

The physical data is stored in a locked space that has access rights for only those who are legitimate.

The electric data is stored in a server space meeting the requirements for personal data processing. The telecommunication connection from user's browser to the server is encrypted. Only limited number of employees of the controller and subcontractors have access to the register who need the information to organise the Annual General Meeting.

#### 9. The storage and removal of personal data

Innovatics Oy stores the personal data maximum one year after the ending of Annual General Meeting.

Solwers Plc stores the personal data maximum four months after the ending of Annual General Meeting.



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The meeting minutes of the Annual General meeting and the attached voting list is stored permanently. It contains the names of the shareholder participants, possible names, number of shares and votes of the proxy or aides and the numbers of the voting tickets.

Other information is destroyed when they are no longer necessary to draw or certify the minutes of the meeting.

# 10. The rights of the registered

A registered person has the right to know what personal data has been stored. A registered person has the right to correct, remove or complete the personal data. Possible requests are sent in written format to the contact person mentioned in paragraph 1.

The registered person has the right to make a complaint to the data protection officer if the person has something to remark concerning the data handling. Instructions can be found from the Office of the Data Protection Ombudsman's internet address https://tietosuoja.fi/en/home