

March 12, 2025

Privacy notice

This Privacy Notice describes the processing of personal data related to Suominen Corporation's ("Suominen") Annual General Meeting to be held on April 25, 2025.

1. Data controller and contact person

Suominen Corporation
Keilaranta 13 A, 02150 Espoo, Finland
Business ID: 1680141-9

Contact person:

Anni Luoma
anni.luoma@suominencorp.com
+358 10 214 300

2. Purpose and legal basis for processing personal data

The purpose of processing personal data is to enable carrying out the Annual General Meeting of the data controller in accordance with and as required by law.

Personal data is processed for the purposes necessary for the organization of the Annual General Meeting, including without limitation, to enable shareholders to register to the meeting, to verify a registrant's identity and his/her right to participate in the meeting, to prepare a list of participants, list of votes and possible voting tickets, and to organize any voting. The processing of personal data is primarily based on the statutory obligations of the data controller, such as compliance with the obligations set forth in the Finnish Limited Liability Companies Act (624/2006) and other legislation applicable to Suominen.

The technical implementation of the registration system, meeting hall bookkeeping and advance voting and possible voting during the Annual General Meeting is carried out by Innovatics Oy. The list of shareholders is maintained by Euroclear Finland Ltd.

Participation in the Annual General Meeting requires the provision of personal data as described in this privacy notice.

3. Types of personal data processed

The processed personal data include:

- name,
- date of birth,



- personal identification number and/or business ID,
- address,
- contact details,
- number of shares and votes and voting information,
- authentication method,
- basis of representation,
- date of registration,
- possible proxy representative's name and personal identification number / date of birth, and
- information on potential assistant (such as name and date of birth) and any additional information provided in connection with the registration to the Annual General Meeting.

When participating in the Annual General Meeting, the time of arrival and departure of each participant are recorded. For technical maintenance and monitoring of the service, log data on registration and voting, as well as the user's IP address are also recorded.

In addition, the processed personal data contain the list of shareholders on the record date of the Annual General Meeting created by Euroclear Finland Ltd, which includes, without limitation, shareholder's name, personal identity number/business ID, address, and number of shares. Furthermore, the processed personal data contain a temporary list of shareholders created by Euroclear Finland Ltd for the Annual General Meeting, containing information on nominee registered shareholders registered for the General Meeting and their number of shares.

4. Regular sources of data

Personal data is mainly collected from the shareholder or from the shareholder's representative or assistant in connection with the registration to the Annual General Meeting. When registering via email, mail or telephone, the data controller or Innovatics Oy collects the registrant's personal data and advance votes.

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 of the Annual General Meeting from the list of shareholders maintained by Euroclear Finland Ltd.

In addition, Innovatics Oy collects the voting instructions for nominee registered shareholders represented by account operators at the Annual General Meeting.

5. Disclosures and transfers of personal data

Based on the personal data, a list of votes and a summary of the votes cast are established and attached to the minutes of the Annual General Meeting. The list of votes contains the name of the shareholder and possible proxy representative and/or assistant, number of the



voting ticket (participant number), number of shares by share class, number of votes, basis of representation and means of attendance.

In accordance with the Finnish Limited Liability Companies Act, the shareholders' register is made available at the Annual General Meeting. The shareholders' register includes names of the shareholders, their municipality, and the number of shares and votes on the record date of the Annual General Meeting. It also contains information on nominee registered shareholders who are temporarily registered in the shareholders' register for the Annual General Meeting.

6. Transfers of personal data to third parties and outside the EU or the European Economic Area

Personal data may be made available to third parties who participate in the arranging of the Annual General Meeting and need the information for this purpose in their own operations or otherwise to act on behalf of Suominen. Personal data is not disclosed for commercial purposes.

Personal data is transferred on behalf of and for the account of Suominen to the technical service provider Innovatics Oy and to Euroclear Finland Oy, which maintains the registration system. Additionally, other service providers may be used if necessary. Euroclear Finland Oy employs external service providers for the maintenance of its systems, which may operate outside the EU or the European Economic Area. The security and appropriateness of personal data processing are ensured through agreements that incorporate the applicable standard contractual clauses of the European Commission under the General Data Protection Regulation, as well as other appropriate and legal safeguards.

Furthermore, Suominen may disclose personal data to competent authorities when required by law, in preparation for legal proceedings, or to defend against legal claims, within the limits set by the applicable legislation or as mandated by law. If Suominen restructures its business, personal data may be disclosed to prospective buyers or their representatives in compliance with the applicable legislation.

For registrants with Finnish phone numbers, text messages are sent via service provided by Softera Oy. For those with international numbers, text messages are sent using a Swiss service. In situations other than those mentioned above, personal data is not transferred or disclosed outside the EU or the European Economic Area.

Further information on the transfers or disclosures of personal data and the applicable transfer bases is provided by the contact person mentioned in section 1.



7. Retention and deletion of personal data

Personal data is retained only for as long as necessary to organize the Annual General Meeting and to comply with the retention periods prescribed by law.

Innovatics Oy stores personal data for a maximum of two years after the Annual General Meeting. Euroclear Finland Ltd stores personal data for a maximum of four months after the Annual General Meeting.

The minutes of the Annual General Meeting and the list of votes attached thereto are stored throughout the operational life of the company in order to comply with the company's statutory obligations. The list includes the names of shareholders who participated in the Annual General Meeting, the names of potential proxy representatives and assistants, basis of representation, the number of shares and votes, and the numbers of the voting tickets.

Other personal data is destroyed when it is no longer necessary for drawing up the meeting minutes or to verify the correctness of the data contained therein.

8. Rights of the data subject

The data subject may use the rights related to the processing of their personal data specified below with regard to Suominen by contacting the contact person mentioned in section 1. The exercise of the rights is a personal right of the data subject and requires identification.

- Right of access: The data subject has the right to get a confirmation from Suominen on whether Suominen processes personal data concerning the data subject, as well as the right to access such data. Suominen may request the data subject to specify their request, amongst others, with regard to the details of the data to be delivered.
- Right to rectification: The data subject has the right to have Suominen rectify inaccurate personal data concerning them processed by Suominen, and to have incomplete personal data processed by Suominen to be completed.
- Right to be forgotten: The data subject has the right to have Suominen erase personal data related to them. Suominen has the obligation to erase such data if there is no longer a legal ground for processing such data and the legal obligation binding Suominen related to the storing of the personal data has terminated.
- Right to restriction of processing: In certain cases prescribed by law, the data subject may have the right to have Suominen restrict the processing of their personal data.
- Right to object to processing of personal data: In certain cases, the data subject may have the right to object to the processing of their personal data. The right to object is applicable to such situations in particular where the processing of personal data is based on the controller's legitimate interest. In such situations, Suominen has to comply with the data subject's request, unless Suominen demonstrates compelling legitimate grounds for the processing that override the interests, rights and



freedoms of the data subject or the personal data is needed for the establishment, exercise or defence of legal claims.

In case there is an objection to the processing of the personal data, the data subject has the right to lodge a complaint with the Data Protection Ombudsman. The instructions can be found on the website of the Data Protection Ombudsman at <https://tietosuoja.fi/en/home>.

