

## PRIVACY STATEMENT ON THE SHAREHOLDER REGISTER

### 1. Controller

Lehto Group Plc  
Voimatie 6 B  
90440 Kempele  
(hereinafter referred to as the “Controller”)

### 2. Contact person in matters concerning the register

Virpi Virtanen  
tel. +358 207 600 900  
[tietosuoja@lehto.fi](mailto:tietosuoja@lehto.fi)

### 3. General

The Controller may update this privacy statement from time to time, such as due to legislative amendments. The Controller shall take any reasonable measures to inform you of any such changes and their impacts well in advance. The Controller urges you to review this privacy statement whenever you are informed that it has been updated. This privacy statement was last updated on 26 February 2019.

### 4. Data Subject

The shareholder register maintained by the Controller processes personal information on the contact persons of organisations that hold shares in the Controller or shareholders who are natural persons, or the persons authorised by the above parties (“Data Subject”).

### 5. Purpose and legal basis for processing personal data

Personal data in the shareholder register is processed to maintain the shareholder list and to manage registrations and participation in General Meetings. Processing is based on the Controller’s statutory obligation to maintain a list of shares and their holders as well as to keep a record of Data Subjects who register and participate in General Meetings.

### 6. Data included on the register

The shareholder register may contain the following information on the Data Subject: name, personal identification number or other identifier, contact information (address, telephone number and email address), book-entry account number, number of shares and votes, and voting record.

### 7. Recipients of personal data

Euroclear Finland Oy maintains and manages the shareholder register’s shareholder list, registrations to General Meetings and participant lists of General Meetings. This information may also be processed by Euroclear Finland Oy’s subcontractors with whom an agreement on data processing has been made in accordance with the General Data Protection Regulation (2016/679). At present, Euroclear Finland Oy’s subcontractors are Tieto Finland Oy, Capgemini Finland Oy and Tata Consultancy Services Limited. The purpose of data transfer to said subcontractors is the development and upkeep of the Finnish book-entry securities system and clearing systems. Personal data may also be processed by authorised persons in the employ of the Controller in order to fulfil their own obligations based on their employment relationships. Some of the information in the shareholder list is public as required under the Companies Act and is thus available to all interested parties.

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#### **8. Transfer of data outside the EU or the EEA**

Euroclear Finland processes personal data outside the EU and EEA in India using Capgemini Finland Oy, Tieto Finland Oy and Tata Consultancy Services. Processing is based on agreements made between Euroclear Finland Oy and subcontractors, which include the standard clauses under the General Data Protection Regulation.

#### **9. Data sources**

Data is sourced primarily from the Data Subject itself or an entity represented by the Data Subject. Data may also be obtained from the book-entry securities system and, in accordance with the Act on the Book-Entry System and Settlement Activities, from account operators, the book-entry securities system and the authorities. Based on the identity number or Business ID provided by the Data Subject, the Controller is capable of comparing the information entered with the Controller's shareholder register and to pick the ownership information of the shareholder from the register.

#### **10. Personal data retention period**

Data will be stored in the General Meeting system for four months after the date of the General Meeting, after which the data will be deleted. Shareholder list data will be kept for as long as no changes in the shareholder data have occurred due to change in ownership, after which the shareholder list will be updated to correspond to the up-to-date shareholder data. Payment-related data will be stored in the register in accordance with the Accounting Act and Act on Prepayment of Tax. The General Meeting participant list will be kept permanently as an annex to the minutes of the meeting as required by law.

#### **11. Potential risks related to the rights and freedoms of Data Subjects and applicable information security procedures**

The connection between the user's browser and Euroclear Finland Oy's server is SSL encrypted. The electronic databases are protected by passwords and other technical measures, and access is restricted to the personnel whose duties require the use of these systems. The Controller has the possibility to receive the voting information of an individual Data Subject from Euroclear Finland Oy in order to verify the validity of the voting result.

#### **12. Rights of the Data Subject**

The Data Subject has the right to submit a sufficiently itemised request to exercise the rights mentioned below to the Controller by email to tietosuoja@lehto.fi. The Controller may ask the Data Subject to specify its request in more detail and it may verify the Data Subject's identity before handling the request. The Controller may refuse to fulfil a request on the grounds laid down in the General Data Protection Regulation.

##### **a. Right to be informed of the processing of personal data**

The Data Subject has the right to be informed of the processing of their personal data.

##### **b. Right to access personal data and right to correct or supplement data**

Data Subjects are entitled to receive a copy of the personal data about them or otherwise obtain access to their personal data without charge. Data Subjects are entitled to supplement their personal data and to request that the Controller correct inaccurate and incorrect personal data about the Data Subject without undue delay.

##### **c. Right to have data erased**

Data Subjects are entitled to have data about them erased from the register if the data is no longer needed for the original purposes and the data processor no longer has any grounds based on matters such as fulfilling contractual or statutory obligations.

**d. Right to restrict processing**

Data Subjects are entitled to have data processing restricted only to data retention if there are grounds for this in the General Data Protection Regulation.

**e. Right to transfer data**

Data Subjects are entitled to have the data that concerns them and that they have delivered to the Controller transferred from one system to another in cases such as when the legal basis for processing was the Data Subject's consent or agreement and the processing is conducted automatically.

**13. Right to complain to the supervisory authority**

Data Subjects are entitled to file complaints with the supervisory authority if they consider that regulations concerning data protection have not been complied with when personal data about them was processed. In Finland, the supervisory authority is the Data Protection Ombudsman ([www.tietosuoja.fi](http://www.tietosuoja.fi)). Exercising this right shall not prejudice the Data Subject's other means of administrative appeal or legal remedy.

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