

## Data protection report, shareholders' register

### 1 Controller and register's contact person

The data controller is Lehto Group Plc, Voimatie 6 B, 90440 Kempele, Finland. The contact person of the register is Markus Kouhi, address: Äyritie 12 B, 01510 Vantaa, Finland, [markus.kouhi@lehto.fi](mailto:markus.kouhi@lehto.fi).

### 2 Name of register, purpose of processing data and description of register's principles of protection

The name of the register is Shareholders' Register and its purpose is to enable shareholders of Lehto Group Plc (hereinafter the "Company") to register for the Annual General Meeting. The Company is obliged to confirm the identity of a person registering for the meeting, to connect the identity to a shareholding and this way confirm the shareholder's right to take part in the Annual General Meeting. The information is not used for direct marketing, tele-shopping, market research or public opinion polling purposes.

Euroclear Finland Oy is in charge of the technical implementation of the service. The data connection between the user's browser and the Euroclear Finland Oy's server is SSL-encrypted and the materials are not stored manually.

### 3 Register's data content

The Company uses the data in the register solely for the performance of the Annual General Meeting and the required measures pertaining to it. The information collected of the enrollee for the register includes:

- name;
- identity number or Business ID;
- contact information (address, phone number and e-mail address);
- securities account number;
- number of shares and votes; and
- voting information

The securities account number is used solely for identification which takes place in the Euroclear Finland Oy's system. It shall not be disclosed to the Company. The Company has the possibility to receive the voting information of an individual shareholder in order to verify the validity of the voting result.

### 4 Regular sources of information

The information is received mainly from the enrollee. When a person registers herself or himself via the Internet, she or he is requested to enter personal information. Based on the identity number or Business ID, the system is capable to compare the given information with the Company's shareholders' register held by Euroclear Finland Oy and thus identify the ownership information of the person. In cases where the person authorises a third party to act as her or his representative, the requested personal information must be entered also for the authorised person. If a person registers herself or himself via telephone or letter, the Company shall enter the received information into the system maintained by Euroclear Finland Oy.

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**Visiting address:**

Lehto Group Plc  
Voimatie 6 B  
90440 Kempele

**Electronic invoicing address:**

EDI ID: 003722354432  
Operator: Ropo Capital  
Intermediator ID: 003714377140

**Invoicing address:**

Lehto Group Plc  
PL 172  
70080 Ropo

**Phone:**

+358 207 600 900

**Business ID:**

2235443-2

**E-mail:**

firstname.lastname@lehto.fi

**Internet:**

www.lehto.fi

#### 5 Regular disclosure of data or transfer of data outside the EU or EEA

The information is not regularly disclosed to any third parties or transferred outside the EU or the EEA.

#### 6 Inspection right and right to demand rectification

The enrollee has the right to request to see her or his information and to have the mistakes corrected. Everyone has the right to request a correction of mistaken information in the register. Certain mistakes the Company shall correct in collaboration with Euroclear Finland Oy. The Company cannot correct erroneous information received from the asset manager of a nominee shareholder.

We kindly ask you to make all correction requests as detailed as possible and to address them to the contact person of the register whose details you can find above in Section 1.

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