

# Privacy statement

## Puulo Plc's Annual General Meeting 2024

The privacy statement for the 2024 Annual General Meeting (the "Privacy Statement") describes what personal data is collected about you as Puulo Plc's ("Puulo") shareholder or shareholder's representative for the purpose of arranging the 2024 Annual General Meeting, how the personal data is processed and to whom the personal data is shared. This Privacy Statement also describes your rights when your personal data is processed.

Personal data are be processed in accordance with the EU General Data Protection Regulation (Regulation (EU) 2016/679, as amended), the Finnish Data Protection Act (1050/2018, as amended) and other applicable data protection legislation.

### 1. Controller and contact information

Puulo Plc, business ID: 2726573-8  
Pakkalankuja 6, 01510 Vantaa, Finland

Contact person:  
Ville Ranta  
ville.ranta@puulo.fi

### 2. Name of the register

Puulo Plc's register of general meetings.

### 3. The purpose and legal basis for processing personal data

The purpose of processing personal data is to enable the controller to organize and conduct the General Meeting in accordance with the law.

Personal data are processed only for the purposes necessary for the organization of the General Meeting, such as to verify the identity of the registrant and their right to participate, prepare a list of participants, a list of votes, possible ballots and the minutes of the General Meeting, organize any voting, and manage possible questions and requests to address the General Meeting.

The technical implementation of the registration system and advance voting as well as possible voting during the General Meeting and General Meeting hall bookkeeping is carried out by Innovatics Oy. The shareholders' register is maintained by Euroclear Finland Oy. Inderes Oyj is responsible for the General Meeting service in its entirety. In addition, other service are used if needed.

Processing of personal data is based on the legal obligations of the controller.

#### **4. Processed personal data**

Personal data is processed only to the extent necessary for the purposes set out above.

The personal data processed include the shareholder's and their possible proxy representative's name, personal identity number and/or business ID, address, contact details, number of shares and votes, voting information, authentication method, basis of representation, date of registration, and possible information on assistant, power of attorney, preliminary questions, and any additional information provided in connection with the registration. When participating in the General Meeting, the time of arrival and departure of each participant are also recorded. For technical maintenance and monitoring of the service, log data on registration and voting, as well as the user's IP address are recorded.

The register contains the shareholders' register of the record date created by Euroclear Finland Oy for the General Meeting, containing, e.g., the shareholder's name, personal identity number/business ID, address, and number of shares.

The register contains a temporary shareholders' register created by Euroclear Finland Oy for the General Meeting, containing information on nominee-registered shareholders registered for the General Meeting and their number of shares.

#### **5. Regular sources of data**

Personal data is mainly collected from the shareholders themselves or from their representatives in connection with the registration for the General Meeting. When registering via e-mail or regular mail, the controller or Innovatics Oy enters the registrant's personal data and possible advance votes into the register.

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 shareholders' register created by Euroclear Finland.

Innovatics Oy enters the voting instructions of nominee-registered shareholders represented by account operators at the General Meeting into the register.

#### **6. Disclosures and transfers of personal data**

Based on the information in the register, a list of votes and a summary of the votes cast are established and attached to the minutes of the General Meeting. The list of votes contains the name of the shareholder and possible proxy representative and/or assistant, the ballot number (participant number), number of shares by share class, number of votes, basis of representation and means of attendance.

At the General Meeting, a shareholders' register is available in accordance with the Finnish Companies Act, which includes the names of shareholders, their municipality and the number of shares and votes according to the record date of the General Meeting. The list also contains information on nominee-registered shareholders who are temporarily registered in the

shareholders' register for the General Meeting.

## **7. Transfer of data to third parties and outside the EU or the European Economic Area**

In principle, personal data is not disclosed to third parties. However, Puuilo may disclose personal data to its group companies or if Puuilo is required to do so on the basis of a legal obligation or an order of an authority. In addition, the data contained in the register may be shared with third parties involved in organizing the General Meeting who need the registered data in their operations. Data is not disclosed for commercial purposes.

Personal data is not transferred or disclosed outside the EU or the European Economic Area, unless required for the organization of the General Meeting.

## **8. Basis for register protection**

Physical material is stored in a locked room accessible only to persons entitled to the data.

Electronic material is stored in a data room that meets the requirements for the processing of personal data. The connection from the user's browser to the server is encrypted. Access to the register is limited to the employees of the controller and subcontractors who need and process data to organize the General Meeting.

## **9. Storage and deletion of personal data**

Personal data will be stored until the purposes set out in this Privacy Statement have been fulfilled and as long as required under applicable legislation.

Innovatics Oy stores personal data for a maximum of two years after the end of the General Meeting.

Euroclear Finland Oy stores personal data for a maximum of four months after the end of the General Meeting.

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 possible proxy representatives and assistants, the number of shares and votes, and ballot numbers. Other data is destroyed when it is no longer necessary to draw up the minutes or to verify its accuracy.

Appropriate technical and organizational measures are being used to protect the personal data from loss, misuse, unauthorized access, disclosure, alteration and destruction.

## **10. Rights of the data subject**

Data subjects have the right to know the data stored about them in the register. The data subject has the right to request rectification, deletion or complementing of their data. Any request shall be addressed in writing to the contact person mentioned in Section 1 above.

The data subject has the right to lodge a complaint with the Data Protection Ombudsman if they have objections to the processing of personal data. The instructions are found on the website of the Data Protection Ombudsman at <https://tietosuoja.fi/en/home>.

## **11. Changes**

This Privacy Policy may be updated, for example, if required by changes in applicable legislation. Depending on the significance of the update, Puuilo will notify the change by email or other means it deems appropriate.