

7.3.2023

Privacy Statement for The Annual General Meeting of Netum Group Plc

Controller

Netum Group Oyj
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Yliopistonkatu 58 B
33100 Tampere

Contact details of controller's contact person

Pekka Levänen
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Contact details of Data protection officer

Mirella Miettinen
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Purpose for processing of personal data

The purpose for processing personal data is to enable shareholders of Netum Group Plc ("Netum") to register for, vote in advance and participate online in the Annual General Meeting. The personal data is also processed to verify the person's identity, shareholding and their right to attend and vote in advance in the meeting. The technical provider of the meeting system including registration and remote meeting platform is Euroclear Finland Ltd ("Euroclear Finland"). Shareholders may also use the same system to authorise a proxy representative.

Legal basis for processing of personal data

The processing of personal data described in this Policy is primarily based on Netum's statutory obligations to hold an Annual General Meeting and to verify the identity of participants, and secondarily on Netum's legitimate interests in organising and correctly holding an Annual General Meeting. The data will not be used for any other purposes.

Data subjects and content of the register

Netum processes the following personal data on the meeting participants and shareholders, who participate in advanced voting:

- Name (full name)
- Social security number
- Phone number
- Email

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- Address
- Book-entry account number
- Number of shares and votes held
- Voting details
- User access details for using remote meeting platform
- Time details regarding joining and leaving the meeting
- Recording of the meeting
 - o presentations (organisers only)
 - o chat channel (question from participants)

Regular sources of information

Data is primarily collected directly from the participants of the meeting themselves. Based on the personal identity number provided by the system user, the meeting system will compare the supplied data with the shareholder register held by Euroclear Finland and extract details of the registrant's holding from the shareholder register. The book-entry account number will only be used within Euroclear Finland's system during identification and will not be supplied to Netum. When authorising a proxy representative, the shareholder will also enter the required personal details of them to the meeting system. Netum has the right to receive voting details pertaining to individual shareholders in order to ensure the accuracy of the voting results.

Retention and deletion of personal data

Netum stores personal data only as long as it is necessary for the purposes of the use of data or as long as required by applicable legislation. Euroclear Finland shall retain the personal data for four (4) months from the end of the Annual General Meeting

Data disclosures and data transfers outside the EU or the European Economic Area

Euroclear Finland is the technical provider of the meeting system for The Annual General Meeting of Netum, which means that Euroclear Finland has access to personal data provided via the system. The data supplied during registration will also be compared to the Netum shareholder register maintained by Euroclear Finland. Netum has signed the appropriate agreements with Euroclear Finland regarding the disclosure of data. Netum will not disclose or transfer the personal data collected in connection with registration for the General Meeting outside of the EU or EEA. In case any personal data is transferred outside the European Union or the European Economic Area as part of the production process of the meeting system, the transfer takes place as permitted by applicable legislation. In such case, personal data is transferred by using the EU Commission Standard Contractual Clauses or another permitted transfer mechanism under the data protection regulation.

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Regular disclosures of personal data to third parties

Data is not regularly disclosed.

Profiling and decision-making

The data contained in the register will not be used for profiling or automated decision-making.

Data subjects' rights

Data subjects have the following rights according to the applicable data protection legislation:

- Data subject is entitled to obtain information on the personal data concerning them which Netum is processing and obtain a copy of such personal data
- Data subject is also entitled to request for the rectification, removal or supplementing of their personal data.

Data subjects who wish to exercise their rights as referred to above are asked to make the request to this effect to Netum at tietosuoja@netum.fi.

Netum is entitled to decline requests on statutory grounds. Netum shall inform the data subject of such a decline including the grounds for the decline

Right to lodge a complaint with the local data protection authority

Data subject has the right to lodge a complaint to the supervisory authority, which in Finland is the Office of the Data Protection Ombudsman (please see tietosuoja.fi).

Security measures

Netum has implemented the appropriate technical and organisational data protection mechanisms required by law in order to prevent the unlawful access, processing, deletion and alteration of personal data, as well as other security risks. Similar level mechanisms are also required from Netum's Data Processors.