

Data Privacy Statement

This Privacy Statement describes the personal data processing related to the 4.4.2023 Annual General Meeting.

Updated 21.2.2023.

1. Data Controller

Name	Consti Plc
Address	Valimotie 16, 00380 Helsinki
Business ID	2203605-5

2. Contact Person

Name	Ismo Heikkilä
Contact details	ismo.heikkila@consti.fi

3. Name of the Register

Consti Plc's Annual General Meeting register.

4. Purpose for the Processing of Personal Data

The purpose of the collection of personal data is to organize and execute the Annual General Meeting according to the law. The information is used for creating a list of participants and a voting list, for arranging advance voting and for managing questions asked in advance.

Innovatics Ltd is the technical service provider of the registration and advance voting system. The shareholders' register is maintained by Euroclear Finland Ltd.

Processing of the personal data is based on Consti Plc's legal obligations.

5. Contents of the Register

Register contains the shareholder's name, personal identification number, contact details, name of a possible assistant or a proxy representative, personal identification number of the possible proxy representative and other additional information given during the registration. Register also contains log information about the registration, participation and voting.

Register contains Euroclear Finland's list of the shareholders at the record date, which contains e.g. the name of the shareholder, business or personal identification number, address and the number of shares.

Register contains Euroclear Finland's temporary list of nominee registered shareholders, which have registered to participate the Annual General Meeting.

6. Sources of the Information

The shareholder enters the information about him or herself and the advance votes are stored in the system when registering to the Annual General Meeting. If using a proxy representative, the representative enters the information about the shareholder and his/her advance votes.

When registering via email or mail, the information is entered by the data controller or Innovatics Ltd.

The registration system retrieves the shareholder's data based on the given personal or business identification number from the shareholders' register on the record date of the Annual General Meeting maintained by Euroclear Finland Ltd.

Innovatics Ltd enters the information about the votes of holders of nominee registered shares.

7. Regular Disclosures of the Personal Data

A list of participants and a voting list will be created based on the information entered to the system, and the said lists will be attached to the minutes of the Annual General Meeting.

The shareholders' register is made available in the Annual General Meeting containing the name, municipality and details on ownership of all shareholders as at the record date of the Annual General Meeting. The register will also contain the information of holders of nominee registered shares who have temporarily registered into the shareholders' register for the Annual General Meeting.

8. Personal Data Transfers to Third Parties and Outside EU or European Economic Area

Information may be made available to such third parties who'll participate in arranging the Annual General Meeting and need the information for such purpose. The data is not handed over to commercial purposes.

Text messages to registrants are sent via a Swiss service. Otherwise no information is transferred outside the EU or the European Economic Area.

9. Protection of the Personal Data

Non-digital data is kept in a locked space and is available only for authorized persons.

Digital data is stored in a data center that meets the requirements for processing personal data. Data connection between the user's browser and the server is encrypted. Access to the system is limited to those employees of the data controller and its subcontractors who need and process the information for arranging the Annual General Meeting.

10. Retention and Deletion of the Personal Data

Innovatics Ltd stores the personal data for a period of one year after the Annual General Meeting. Euroclear Finland stores the data for a maximum of four months.

The list of participants of the Annual General Meeting is stored permanently. It contains the participant's name, names of possible assistants and proxy representatives, number of shares and details related to voting.

All other data is deleted, when they are not required for documenting the Annual General Meeting's minutes or checking for their accuracy.

11. Registrant's Rights

Registrant is allowed to know all data stored by the data controller about him- or herself into the register. Registrant has also a right request to ask for correcting, deleting or appending the data. The request should be appointed to the contact person mentioned in the chapter 2 of this document.

Registrant's can also complain to the Finnish data protection authority (www.tietosuoja.fi), if they feel that their rights are not treated properly.