

## Privacy statement

This privacy statement describes the processing of personal data related to Lumo Kodit plc's General Meeting.

### 1. Controller and contact information

Lumo Kodit plc  
Mannerheimintie 168a, 00301 Helsinki  
0116336-2  
Pia Pynnä [tietosuoja@lumo.fi](mailto:tietosuoja@lumo.fi)

### 2. Name of the register

Lumo Kodit 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 execution of the controller's General Meeting in accordance with the law, to allow shareholders to register and participate in the annual general meeting and the webcast and to verify the identity and participation rights of each registrant.

Personal data is processed solely for purposes necessary for organizing the general meeting, such as verifying the identity and participation rights of the registrant, preparing the list of participants, the voting list, and possible voting tickets, organizing the voting, and managing any questions and requests to be heard.

The technical implementation of the registration system, General Meeting hall bookkeeping and possible advance voting and/or possible voting during the General Meeting is carried out by Innovatics Oy. The list of shareholders is maintained by Euroclear Finland Oy. Inderes Oyj is responsible for the General Meeting service in its entirety. Inderes Oyj stores log data generated from the use of the registration website and may use it for technical monitoring of the system, ensuring operational reliability, and usage statistics (read more here: [https://ir1.innovatics.fi/tiedostot/Innovatics\\_Oskari\\_Tietosuojaseloste\\_2023-02-20.pdf](https://ir1.innovatics.fi/tiedostot/Innovatics_Oskari_Tietosuojaseloste_2023-02-20.pdf)).

The processing of personal data is based on the controller's statutory obligation. The controller has a statutory obligation under the Limited Liability Companies Act (624/2006) to hold a general meeting, which also includes the obligation to prepare the minutes of the general meeting and the voting list. Additionally, the processing of personal data is necessary to fulfill the legitimate interests of the controller, such as enabling the webcast intended for shareholders.

### 4. Processed personal data

The processed personal data include the shareholder's and their possible proxy'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 aid, 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 recorded. For technical maintenance and monitoring of the service, log data on registration and voting, as well as the user's IP address are also recorded.

The register includes the record date shareholder register created by Euroclear Finland for the general meeting, which contains, among other things, the shareholder's name, personal/business ID, address, and number of shares. The register also includes the temporary shareholder register created by Euroclear Finland for the general meeting, which contains information about the nominee-registered shareholders who have registered for the general meeting and their number of shares.

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

Personal data is mainly collected from the shareholder themselves or from their representative in connection with the registration to the General Meeting. When registering via e-mail, mail or telephone, the controller or Innovatics Oy enters the registrant's personal data and 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 list of shareholders created by Euroclear Finland.

Innovatics Oy enters the voting instructions for 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 meeting. The list of votes contains information on the name of the shareholder and possible proxy and/or aid, number of the vote ticket (participant number), number of shares by share class, number of votes, basis of representation and means of attendance.

At the general meeting, in accordance with the Limited Liability Companies Act, the shareholder register is made available, which includes the names of shareholders, municipality, and the number of shares and votes according to the record date of the meeting. The list also contains information on nominee registered shareholders who are temporarily registered in the list of shareholders for the General Meeting.

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

The data contained in the register may be shared with third parties involved in organising the General Meeting who need the registered data in their operations. Data is not disclosed for commercial purposes. Innovatics Oy is responsible for the technical implementation of the registration system for the general meeting, as well as any advance voting and/or voting during the meeting and the minutes. Euroclear Finland Oy maintains the shareholder register. Inderes Oyj provides the technical execution of the general meeting.

For recipients with Finnish phone numbers, text messages are sent via a Finnish service provider Softera Oy. For those with foreign numbers, text messages are sent using a Swiss service. Otherwise, personal data is not transferred or disclosed outside the EU or the European Economic Area.

## **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 organise the General Meeting.

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

Personal data is retained for as long as its processing is necessary for the purposes for which the personal data was collected.

Lumo stores the personal data related to the general meeting for a year after the end of the meeting. Innovatics Oy stores personal data for a maximum of one year 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 in the Lumo document systems. It includes the names of shareholders who participated in the General Meeting, the names of potential proxies and aids, the number of shares and votes, and the numbers of the voting tickets.

Other data is destroyed when it is no longer necessary to draw up the minutes or to verify their accuracy.

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

The data subject has 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/>