

## **PRIVACY NOTICE**

### **1. REGISTERS RELATED TO FONDIA PLC'S MARKET ABUSE REGULATION AND RELATED PARTY MATTERS**

Registers related to Fondia Plc's market abuse regulation and related party matters:

1. list of Persons Discharging Managerial Responsibilities (PDMR) and their Closely Associated Persons and Undertakings (PCAs) under Market Abuse Regulation (EU No 596/2014);
2. PDMR's and PCA's transactions;
3. IAS 24 Related parties register;
4. IAS 24 Transactions Related parties' transactions;
5. Project specific insider registers; and
6. List of persons acting in the information core of Fondia Plc

### **2. DATA CONTROLLER**

Fondia Plc (business ID 0706964-1) ("**Fondia**")

P.O. Box 4, 00101 Helsinki

phone +358 20 7205 400

email: [privacy@fondia.com](mailto:privacy@fondia.com)

Inquiries related to management / related party transactions may also be addressed to:  
[insiders@fondia.com](mailto:insiders@fondia.com)

### **3. PURPOSE OF DATA PROCESSING AND LEGAL BASIS OF PROCESSING**

- a. Required by the Market Abuse Regulation (EU No 596/2014)
  - maintaining the company's insider list;
  - maintaining a list of executives subject to the disclosure obligation and persons and entities closely associated with them; as well as
  - monitoring and reporting transactions of the company's shares and other financial instruments by the company's executives subject to disclosure obligation and persons and entities closely associated with them, as well as publishing register information.
- b. Required by obligations by Limited Liability Companies Act, Accounting regulation including the Finnish Accounting legislation and International Accounting Standard 24 ("IAS 24") as well as the Finnish Corporate Governance Code.
  - maintaining the company's list of related parties;

- maintaining a list of executives and their related parties subject to the disclosure obligation under IAS 24; as well as
- monitoring and reporting transactions of the company's shares and other financial instruments by the company's executives and their related parties subject to disclosure obligation under IAS 24.

#### **4. PERSONAL DATA PROCESSED**

The information collected and processed is enclosed as Appendix 1.

#### **5. REGULAR SOURCES OF INFORMATION**

Company, the data subjects themselves and their authorized parties, book-entry system, Financial Supervision Authority, other public databases.

#### **6. REGULAR DISCLOSURE OF PERSONAL DATA AND TRANSFER OF DATA OUTSIDE THE EUROPEAN UNION OR THE EEA**

The company is obliged by law to disclose the information in the insider register to the competent authorities upon request.

The company is obliged by law to disclose to the competent authorities the information on transactions in the company's shares reported by the executives subject to disclosure obligation and persons closely associated with them, and to publish the transactions reported by them, and keep the information visible on the company's website. The information published on the website does not include social security numbers and home addresses.

The data is stored and maintained in a cloud-based service provided by InsiderLog AB. InsiderLog applies appropriate technical and organizational security measures to maintain integrity and confidentiality of the data. Only people whose work-related tasks require them to process the personal data can access the data.

Personal data is not transferred outside the EU/EEA.

#### **7. STORAGE TIME**

Data is stored five years after it is drawn up or updated and IAS 24 data is stored ten years after each financial year after which they will be permanently erased.

#### **8. DATA SUBJECTS' RIGHTS**

As a data subject, you have the following rights:

- The right to inspect the data concerning yourself.
- The right to demand the rectification or deletion of inaccurate data.
- The right to object the processing or ask for the restriction of your data.
- The right to complain of the processing of personal data to the supervisory authority, which is the Office of the Data Protections Ombudsman in Finland.

Information is collected and processed from:	<b>Under Market Abuse Regulation (EU No 596/2014)</b>  Person with access to the inside information to a single project (project-specific)	<b>Under Market Abuse Regulation (EU No 596/2014)</b>  Person Discharging Managerial Responsibilities (“PDMR”) subject to disclosure obligation and Persons and undertakings Closely Associated with them (“PCAs”)	<b>Under International Accounting Standard 24 (IAS 24)</b>  Person identified as related parties	Person acting in the informative core
First name, last name (as well as birth name)	x	x	x	x
Identity number / date of birth	x	x	x	x
Home address and personal phone numbers (direct and mobile)	x	x	x	x
Workplace phone numbers (direct and mobile)	x	x		x
The name and address of the issuer	x	x	x	x
Grounds for including in the list	x	x	x	x
Starting and ending date of the ground for inclusion in the list	x	x	x	x

Information on the transaction on which the notification is based (instrument information, nature, time and place of the transaction, price and volume, aggregated information		x		
<b>Natural persons</b> Family members and other closely associated persons such as spouse or children and their identity number / date of birth and starting and ending date of the ground for inclusion in the list		x	x	
<b>Legal persons</b> Control and related information such as company name, business ID, contact person, basis of control and basis of influence, starting and ending date of the ground for inclusion in the list		x	x	
Subject and parties of the related party transactions			x	
Other possible information necessary for the purposes of use of the registers	x	x	x	x