

# Privacy Notice for Personal Data Register of the Shareholders of Fondia Plc

## 1 Controller

Name: Fondia Plc ("Fondia" or "we")

0706964-1

P.O. Box 4, 00101 Helsinki

Tel: 020 7205 400

## 2 Contact person for register matters

privacy@fondia.com

## 3 Name of register

Fondia's personal data register of the shareholders

## 4 The basis for and purpose of the processing of personal data

The purpose of the processing is based on the law (Limited Liability Companies Act) and the legitimate interest of Fondia. Section 15 of the Limited Liability Companies Act requires a list of shareholders to be maintained. The purpose of processing personal data is to ensure the rights of the shareholder's under the Limited Liability Companies Act, including payment of dividends, payment of capital loans and communications.

In addition, the purpose of the processing of personal data is to facilitate the general meeting of shareholders, which means that personal data is processed for registration, providing of information, verifying the identity and participation of participants, as well as other meeting arrangements related to the general meeting. In addition, the information is used to prepare the voting list of the general meeting and to print ballot papers, to arrange the actual voting and to fulfill the other rights and obligations set forth in the Limited Liability Companies Act and the Articles of Association of Fondia. Information is also used to prepare and implement various Company events and travel arrangements.

## 5 The data content of the register and the groups of the data subjects

The register includes the following personal data of shareholders or representatives of the shareholders:

- name;
- contact information;
- occupation;
- dates of birth;

- information of bank account and book-entry account;
- number of shares by their category and the differences in the rights they create, lien encumbering a share or other equivalent right, current value of the shares;
- the amount of subordinated loans and their interest;
- information concerning enrolment and participation in shareholders meeting, including information of impartiality, representative of a shareholder, special needs and voting data;
- information on electronic enrolment to different events and special needs for them;
- family relationships, spouse and inheritors (articles of association, consent clauses), dates of birth;
- passport copies if the Act on Detecting and Preventing Money Laundering and Terrorist Financing so requires; and
- other possible information necessary for the purpose of use of the register.

Personal data is collected from the data subject him-/herself.

## **6 Regular disclosing and transferring of the data outside EU or EEA**

Fondia does not disclose the data of the register to third parties.

Fondia uses an external service provider for technical fulfillment and maintenance of register concerning list of shareholders and processing of personal data. Fondia has outsourced its IT management partly to external service provider, to which managed and protected servers the personal data is saved.

Due to technical processing of personal data some part of the data may be located physically on servers or devices of external subcontractors, from where it is processed by a technical connection. Personal data is not transferred outside EU or EEA, unless it is necessary for providing the service technically. Even in such situations, Fondia ensures the adequate level of data protection as required by laws and regulations by using EU Commission's standard clauses or the Privacy Shield system.

## **7 The principles concerning the protection of the register and the retention periods**

Only those persons, who on behalf of their working duties are entitled to process shareholder data, are entitled to use a system containing the personal data of the register. Each user has a personal username and password to the system. The information is collected into databases that are protected by firewalls, passwords and other technical measures. The databases and the backup copies of them are stored in locked premises and can be accessed only by certain pre-designated persons.

Personal data included in the list of shareholders are retained for 10 years from the termination of share ownership.

Personal data recorded in or attached to minutes of the shareholders' meeting shall be retained as part of the minutes, as required by the Limited Liability Company Act.

Other data shall be destroyed when they are no longer necessary for drawing up the minutes or ensuring the correctness of the data thereof.

## **8 What are your rights as a data subject?**

The data subject has the right to inspect the personal data concerning himself, which is stored in personal data register and right to require rectification or deletion of inaccurate, outdated or illegal data.

According to the General Data Protection Regulation, the data subject also has a right to object or request restricting the processing and lodge a complaint with a supervisory authority responsible for processing personal data.

For specific personal reasons, the data subject also has a right to object processing concerning himself, when processing the data is based on legitimate interest. In connection to the claim, the data subject should identify the specific situation on which his objection is based. Company can refuse to act on such request only on the basis of the law.