PRIVACY STATEMENT - AGM 2021



## 1. Data controller and contact person

**Caverion Corporation** 

Business identity code: 2534127-4, Domicile: Helsinki

Katriina Anttinen

Torpantie 2, 01650 Vantaa

email: agm@caverion.com or katriina.anttinen@caverion.com

## 2. Purpose and legal basis for processing personal data

The personal data of shareholders and proxy representatives are processed for the purpose of collecting registrations for the General Meeting and for the purpose of ascertaining a registrant's identity and that they have the right to participate in the General Meeting. Personal data are also processed for printing the list of participants and voting list and for arranging voting. Additionally, the personal data may also be processed for other purposes related to arranging the General Meeting and the webcast event following the General Meeting.

A list of participants will be annexed to the minutes of the General Meeting. The list includes the names of the shareholders participated in the meeting, the names of possible proxy representatives, the amounts of shares and votes and the numbers of ballots.

When a shareholder registers for the General Meeting on the website, Euroclear Finland Oy takes care of the technical implementation of data collection. For more information about the data processing carried out by Euroclear Finland Oy, please visit the Euroclear Finland Oy's website.

Pursuant to the Data Protection Regulation (2016/679), the primary legal basis for the processing of personal data is the data controller's legal obligation to hold a shareholders' meeting in accordance with the Limited Liability Companies Act (624/2006), which also includes the obligation to draw up the minutes of the General Meeting as well as the list of votes. Further, in accordance with the Data Protection Regulation, the processing of personal data is also necessary for the purposes of the legitimate interests of the controller.

Personal data will not be used for automated decision-making that would have legal or equivalent effects on the data subjects.



#### 3. Collected personal data

When a shareholder registers for the General Meeting on the website, personal information such as address, business identification code, telephone number, email address and book-entry account number, as well as the name and the personal identification number of a possible proxy representative are collected.

Euroclear Finland Oy takes care of the technical implementation of data collection. The connection from the user's browser to the server of Euroclear Finland Oy is encrypted with SSL technology. When registering for the meeting by other means, the controller or Euroclear Finland Oy enters the personal data into the system maintained by Euroclear Finland Oy as specified in item 4.

The book-entry account number is used solely in registration taking place in Euroclear Finland Oy's system and is not disclosed to the company. The company has the opportunity to get the voting particulars of a single shareholder in order to be able to ascertain the correctness of potential voting results.

#### 4. Regular sources of information

When signing-up on the internet, shareholders enter information about themselves into the registration system. When signing-up in any other manner, shareholders declare their name, personal ID/date of birth or business ID and address, as well as other information required for participation, such as their e-mail address, to the data controller or Euroclear Finland Oy. The recipient of the information enters the shareholder's data in the register maintained by Euroclear Finland Oy. The data of the person registering is compared to the company's shareholder register maintained by Euroclear Finland Oy and the system picks out the ownership data of the person registering from the shareholder register. When giving proxy, the shareholder also inputs the required personal data with regard to the proxy representative.

#### 5. Regular disclosures of personal data

Personal data will be disclosed to Euroclear Finland Oy that acts as the technical service provider and maintainer of the Annual General Meeting registration and advance voting system.

The following information on the shareholder's registration and shareholding is available at Euroclear Finland Oy's premises at Urho Kekkosen katu 5 C, Helsinki:

- name and address or home municipality of the owner
- date of birth



- details on ownership (number of shares by share type)
- information on any joint owners
- information of temporary registration to the Annual General Meeting
- information about a possible customer restriction

# 6. Personal data transfer outside the EU or the European Economic Area

No information is handed over to third parties or transferred outside EU or European Economic Area by Caverion Corporation. Some of Caverion Corporation's service providers may, in limited cases, offer certain support services in connection to which the data may be accessed also from outside the European Economic Area. In these situations, Caverion Corporation ensures an adequate level of protection for personal data through standard contractual clauses prepared by the European Commission or other transfer mechanisms allowed by the General Data Protection Regulation.

# 7. Principles of the protection of the data file/register

<u>Manual register</u>; The list of attendees mentioned above in section 2 is stored as an appendix to the minutes of the meeting. Data concerning those registered by means other than the Internet is held by the person mentioned above in section 1 until the General Meeting, after which it is disposed of.

<u>Electronic data</u>; Euroclear Finland Oy is responsible for the technical maintenance of the register. The connection from a user's browser to the server of Euroclear Finland Oy is encrypted with SSL-technology. Technical data protection is used in the registration system, by means of which the entered information remains unchanged and is available only for persons authorized to receive such information. Data protection technology includes, inter alia, communication encryption, monitoring of message integrity and user identification. Only certain persons have access to the data stored in the registration system. The data is protected by user ID and password.

# 8. Retention and deletion of personal data

Euroclear Finland Oy retains personal data stored in the registration system for 4 months from the end of the Annual General Meeting.

A list of participants will be annexed to the minutes of the Annual General Meeting. The list of participants includes the name of the shareholder, number of the ballot and details on ownership (number of shares and votes). The minutes and



its annexes will be stored throughout the operational life of the company in order to comply with the company's statutory obligations or minimum 10 years after the end of the financial year.

## 9. Data subject's rights

Regardless of secrecy provisions, a shareholder is entitled to access, after having supplied sufficient search criteria, all data concerning himself or herself in the data file, or to receive a confirmation from the data controller that the data file does not contain any personal data concerning the shareholder.

The data controller shall, without undue delay, on its own initiative or at a shareholder's request, rectify, erase or supplement personal data contained in the personal data file, provided that such data is erroneous, unnecessary, incomplete or obsolete for the purposes of the processing the data. The data controller shall also prevent the dissemination of such data, if this could compromise the protection of privacy of the shareholder or his or her rights. If the data controller refuses a shareholder's request concerning rectification of an error, a written certificate to this effect shall be issued by the data controller. The certificate must also mention the reasons for the refusal.

The controller wishes that requests for updates regarding the collected data would be made before the expiration of the General Meeting registration deadline, 10 a.m. EET on 17 March 2021.

A shareholder has the right to object, in relation to his or her particular personal situation, to the processing of the shareholder's personal data by the controller, provided that the processing of the data is based on the legitimate interest of the registrar. If the data subject objects to the processing, the controller may no longer process the personal data, unless the controller can demonstrate that the processing is justified.

In certain situations, further specified in article 18 of the Data Protection Regulation, a shareholder has the right to request the controller to restrict the processing of his or her personal data. A shareholder may request the restriction of the processing of his or her personal data, for example, when a shareholder has objected to the processing of his or her personal data and is awaiting verification as to whether the interests of the controller override the interests of the shareholder. If processing is restricted, the controller may store the data, but in principle may not process it otherwise.

Above described requests, which must be sufficiently detailed, shall be sent to the contact person of the data controller specified in item 1.

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In the event the data subjects have concerns or remarks regarding the processing activities described in this privacy statement, they have the right to lodge a complaint with a data protection supervisory authority. More information www.tietosuoja.fi/en.