

Privacy of our Register of the Shareholders and Annual General Meeting

23 February 2022

Controller and contact for register matters

Betolar Plc, 43300 Kannonkoski, Finland

Contact@betolar.com

(later referred to as "we")

Purpose and legal basis for the processing of personal data

The purpose of the processing is based on the law (Limited Liability Companies Act) and our legitimate interest. Section 15 of chapter 3 of the Limited Liability Companies Act requires a list of shareholders to be maintained. The purpose of processing personal data is also 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 the participants, as well as other meeting arrangements related to the general meeting. Further, 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. Information is also used to prepare and implement various Company events and travel arrangements.

What data do we process and where do we get it from?

We process the following personal data of shareholders or representatives of the shareholders as applicable:

- name;
- contact information;
- dates of birth;
- information of bank account and 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 meetings, including information of impartiality, representative of a shareholder, special needs and voting data;
- information on electronic enrollment to different events and special needs for them;
- log data gathered where digital registration is utilized; and
- passport copies, should the Act on Detecting and Preventing Money Laundering and Terrorist Financing so requires

Personal data is collected from the data subject him-/herself, your authorized representative (where applicable) and from Euroclear Finland Oy.

To whom do we disclose data and do we transfer data outside the EU or EEA?

We do not transfer the personal data of the register to third parties.

We use an external service provider, Euroclear Finland Oy for technical fulfillment and maintenance of register concerning list of shareholders and processing of personal data. We have outsourced our IT management partly to an external service provider, to whose managed and protected servers the personal data is saved.

We do not transfer personal data outside of European Union or European Economic Area.

Principles of safeguarding personal data

Personal data shall be processed confidentially and all persons engaged in processing activities are bound by confidentiality obligation. Only those employees, whose work tasks require processing of personal data, are entitled to use systems containing the personal data of this register. The information is collected into databases that are protected by firewalls, passwords and other technical measures. Betolar employs data security measures to protect the personal data of viruses and malware. The security measures are updated regularly. Each user has a personal username and password to the system, based on which the logins to the system may be tracked. The databases and the backup copies of them are stored in locked premises and can be accessed only by certain pre-designated persons.

For how long do we retain personal data?

Personal data included in the list of shareholders are retained for ten (10) years from the end 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.

Rights of the data subject

You have the right to review your personal data stored in the shareholder and annual general meeting register and require any erroneous, outdated or illegal data to be rectified or corrected. We may also proactively or as per request of the data subject to complete, correct or delete incomplete, inaccurate or outdated personal data.

You have a right to object or request restricting the processing of your data and lodge a complaint with a supervisory authority responsible for processing personal data. The supervisory authority in Finland is the Finnish Dataombudsman (tietosuojaja(at)om.fi).

For specific personal reasons, you have a right to object processing concerning yourself, when processing the data is based on legitimate interest. In connection with your claim, you should identify the specific circumstance on which your objection is based.