

# PRIVACY POLICY – RELAIS GROUP PLC ANNUAL GENERAL MEETING

Privacy Policy – Relais Group Plc Annual General Meeting 26 March 2020

This Privacy Policy (“Policy”) covers the processing of personal data in connection with registration for Relais Group Plc’s (“Relais”) General Meeting.

## 1. Data Controller

The primary data controller of the personal data processed in accordance with this Policy is:

Relais Group Plc, business-ID 2566730-3

Address: Tähtäinkuja 2, 01530 Vantaa, FINLAND

Tel: + 358 50 553 4094

Data Protection Officer: Pekka Raatikainen

If you have any questions concerning your personal data processed under this Policy, you may contact us at [pekka.raatikainen@relais.fi](mailto:pekka.raatikainen@relais.fi).

## 2. Personal Data Processed

Relais processes the following personal data on the participants of the event:

- Name (full name)
- Social security number
- Phone number
- Email
- Address

The information is primarily collected directly from the participants themselves. On the basis of the social security number provided by the user, the system will compare the supplied data with the shareholder register held by Euroclear Oy and extract details of the registrant’s holding from the shareholder register. When authorising a proxy, the shareholder will also enter the proxy’s required personal details.

The book-entry account number will only be used within Euroclear Finland Oy's system during identification and will not be supplied to the company. The company has the right to receive voting details pertaining to individual shareholders in order to ensure the accuracy of the voting results.

### **3. Legal basis and purposes of the processing**

The purpose of processing the above mentioned personal data is to enable Relais Group Plc's shareholders to register for the General Meeting online. Personal data will be collected to enable the identification of shareholders, so that shareholders can register for the meeting and Relais Group Plc can identify the registration and the shareholder's holding. Shareholders may also use the same online service to authorise a proxy.

The processing of personal data described in this Policy is primarily based on Relais' statutory obligations to hold a General Meeting and to verify the identity of participants, and secondarily on Relais' legitimate interests in organising and correctly holding a General Meeting. The data will not be used for any marketing-related purposes.

### **4. Data retention periods**

The personal data collected to enable registration for the General Meeting will be retained for a period of one (1) year after the meeting.

### **5. Regular data disclosures and data transfers outside the EU or the European Economic Area**

Euroclear Finland Oy is the technical implementer of online registration for Relais' General Meeting, which means that Euroclear Finland Oy has access to any personal data provided via the service. The above mentioned data supplied during registration will also be compared to the Relais shareholder register maintained by Euroclear Finland Oy, meaning that Euroclear Finland Oy will receive personal data.

Relais has signed the appropriate agreements with Euroclear Finland Oy regarding the disclosure of data.

Relais does not use any other service providers or subcontractors in the processing of personal data related to registration for the General Meeting. Relais will not disclose or transfer the personal data collected in connection with registration for the General Meeting outside of the EU or EEA.

## **6. Filing system protection principles**

Relais has implemented the appropriate technical and organisational data protection mechanisms required by law in order to prevent the unlawful access, processing, deletion and alteration of personal data, as well as other security risks. Relais' own data processing systems are protected by firewalls and other technical safeguards. The data stored in the system can only be accessed by certain predefined employees of the controller who are authorised to use the information.

Euroclear Finland Oy is responsible for the technical maintenance of the General Meeting registration database. The data connection between the user's browser and Euroclear Finland Oy's server is SSL encrypted. The system can only be accessed by predefined persons using their username and password.

## **7. Data subject rights**

The applicable legislation guarantees several rights to data subjects in relation to their personal data processed. Relais respects these rights and is committed to fulfilling them. These data subject rights have been listed below. All questions and queries concerning the use of these rights must be sent to [pekka.raatikainen@relais.fi](mailto:pekka.raatikainen@relais.fi). Please note nevertheless that the use of some rights may require that certain legal additional requirements are fulfilled. In addition Relais may have to ask certain additional information on the person who made the request, so that we can verify that you are the person who you claim to be.

- i. The data subject has the right to request access from the data controller to the data subject's personal data and the right to receive a copy of such data;
- ii. The data subject has the right to transfer the personal data from one system to another in cases where the processing was based on consent and has been done by automated means;
- iii. The data subject has the right to request that incorrect, inadequate or outdated data on the data subject is corrected, completed or deleted;
- iv. The data subject has the right to request restriction of processing in certain situations, e.g. where Relais no longer needs the data, but the data subject does not want the data to be deleted and wants its processing to be restricted instead;
- v. The data subject has the right to object the processing of the data subject's personal data on grounds relating to his or her particular situation, e.g. where processing was based on the data controller's legitimate interest and the data controller cannot present compelling grounds for the processing overriding the data subject's interests;
- vi. The data subject has the right to obtain erasure of the data subject's personal data from the data controller under certain situations (the so-called "right to be forgotten"), e.g. where personal data is no longer needed for the purposes it was collected or where the processing was based on consent and consent has been withdrawn;
- vii. The data subject has the right to withdraw his or her consent given for the processing at any time; and
- viii. The data subject has the right to lodge a complaint to the supervisory authority, which in Finland is the Office of the Data Protection Ombudsman (see tietosuoja.fi).

Include the following information to your query:

- Information, which enables us to identify you (such as e.g. full name, email or other equivalent)
- In what role are you contacting us (= Relais Group Plc's Annual General Meeting 2020 participant)
- What above mentioned legal right you wish to make use of.