

PRIVACY POLICY

Processing of personal data relating to the Extraordinary General Meeting of Relais Group Plc on 8 September 2020

Date of drafting: 14/08/2020

1. Controller	Name Relais Group Plc
	Contact information (address, telephone) Tähtäinkuja 2, FI-01530 Vantaa + 358 50 553 4094 info@relais.fi
2. Person responsible for register-related matters and/or contact person	Name Pekka Raatikainen
	Contact information (address, telephone, e-mail) Tähtäinkuja 2, FI-01530 Vantaa + 358 50 553 4094 pekka.raatikainen@relais.fi
3. Purpose of processing of personal data / purpose of register	<p>The purpose of processing of personal data is:</p> <p>Registration of Relais Group Plc's shareholders to the Extraordinary General Meeting of Relais Group Plc and participation in and exercise of voting rights at the Extraordinary General Meeting.</p> <p>The registrations are entered in a general meeting system maintained by Euroclear Finland Ltd.</p> <p>The Company will not disclose the data for direct marketing purposes.</p>
4. Information content of the register	<p>The following information is collected on a shareholder: name, personal identity code, address, telephone number, e-mail address, number of book-entry account, number of shares and votes, voting data.</p> <p>The following data is collected on a person representing and authorised by the shareholder: name, e-mail address and information on whom the representative/authorised person represents.</p> <p>If a shareholder registers through the Internet, Euroclear Finland Ltd will act as the technical provider of the collection of personal data. The connection from the user's browser to Euroclear Finland Ltd's server is SSL encrypted.</p> <p>The number of the book-entry account is only used for identification in Euroclear Finland Ltd's system and will not be disclosed to the Company.</p>

5. Grounds for processing	Under the Finnish Limited Liability Companies Act, the Controller must maintain a list of the shareholders participating in the General Meeting and of persons authorised to represent shareholders at the General Meeting.
6. Regular sources of information	When registering through the Internet, the person themselves enters their personal data. The data is also submitted personally when registering by e-mail or mail. On the basis of the personal identity code given, the system compares the given data with the shareholders' register of the Company, maintained by Euroclear Finland Ltd, and extracts the ownership data on the registering person from the shareholders' register. When providing authorisation, the person shall also enter the required personal data on the authorised person. In order to verify the correctness of voting results, the Company shall be granted access to the voting data of an individual shareholder.
7. Regular disclosures of data and transfer of data outside the EU or EEA	No information is disclosed to third parties or transferred outside the EU or EEA. The processor of personal data is Euroclear Finland Ltd.
8. Storage of personal data	The Controller shall keep the minutes of the General Meeting with an appended list of participants for the period required by legislation at each time and for no less than 10 years.
9. Principles of protecting the register	<p>A. Manual material (place of storage and protection). Manual material is stored in premises with restricted access only by specified persons.</p> <p>B. Data stored in the system (principles of the right to use the register and control of use and physical protection of equipment). Euroclear Finland Ltd is responsible for the technical maintenance of the register. The connection from the user's browser to Euroclear Finland Ltd's server is encrypted. Only specified persons have access to the system with user names and passwords.</p>
10. Data subject's rights and their exercise	<p>A data subject has, after having provided the necessary search criteria, the right to know what personal data on them is stored in the register or that there is no data on them in the register.</p> <p>A data subject has the right to request the Controller to rectify inaccurate and erroneous data, to erase data and to restrict the processing of the data.</p> <p>A data subject wishing to exercise their right shall make a request to that effect to the person responsible for the Controller's register by a personally signed or similarly verified document. The requests shall be addressed to Pekka Raatikainen (contact information above in section 2).</p>
11. Right to lodge a complaint with a supervisory authority	A data subject has the right to lodge a complaint with the Data Protection Ombudsman if they find that their rights under the Data Protection Regulation have been breached in the processing of the personal data.

