

Privacy Policy

This privacy policy describes the processing of personal data relating to the Annual General Meeting of Relais Group Plc.

Updated on 22.3.2022

1. Controller and contact information

Name: Relais Group Plc

Address: Mannerheimintie 105, 00280 Helsinki, Finland

Business ID: 2566730-3

Name of person: Pekka Raatikainen

Contact information: +358 50 553 4094

2. Name of the register

General Meeting register of Relais Group Plc

3. Purpose of and legal grounds for processing personal data

The purpose of processing personal data is to make it possible to organise the meeting of the Controller in accordance with law.

Personal data is only processed for purposes necessary for organising the General Meeting, such as for verifying the identity and right to participate of a person registering for the meeting, for drawing up the list of participants, the list of votes and the voting tickets for the meeting, for organising voting and for managing advance questions and requests to speak.

Innovatics Ltd acts as the technical provider of the registration system and advance voting at the General Meeting. The shareholder register is maintained by Euroclear Finland Ltd.

The processing of personal data is based on the Controller's legal obligations.

4. Processed personal data

The processed personal data includes the following data of the shareholder and of any person representing the shareholder: name, personal identity code and/or business ID, address and contact information, the number of shares and votes, voting data, method of identification, grounds for representation, date of registration, and any data on an assistant, a proxy, advance questions and any other additional data submitted in connection with registration. The time of arrival at and of leaving the meeting are also stored of the participants to the meeting. For the purpose of technical maintenance and monitoring of the service, log entries on registration and voting as well as the user's IP address are also stored.

The register contains a shareholder register of the record date compiled by Euroclear Finland, which contains, inter alia, the name, personal identity code/business ID, address and number of votes of the shareholder.

The register includes a temporary shareholder register compiled by Euroclear Finland for the General Meeting, which contains data on nominee-registered shareholders registered for the General Meeting and the number of their shares.

5. Regular sources of personal data

Personal data is as a rule collected from the persons themselves or their representatives in connection with registering for the General Meeting. When registering by email, mail or by telephone, the Controller or Innovatics Ltd enters the personal data and advance votes of the registering person in the register.

On the basis of the personal data submitted in connection with registration, Innovatics Ltd retrieves the number of shares of the shareholder from the shareholder register of the record date of the meeting compiled by Euroclear Finland Ltd.

Innovatics Ltd enters in the register voting instructions for nominee-registered shareholders represented by account management organisations.

6. Disclosure of personal data

On the basis of the registered data is compiled the list of participants in the meeting and summaries of voting, which are appended to the minutes of the meeting.

In accordance with the Limited Liability Companies Act, a shareholder register which contains the name, municipality of residence and number of shares and votes of shareholders on the record date of the meeting is available at the General Meeting. The register also contains data on the nominee-registered shareholders who are temporarily registered in the shareholder register for the purpose of the General Meeting.

7. Transfer of personal data to third parties and outside the European Union or European Economic Area

Registered data may be shared with third parties participating in organising the General Meeting who need the registered data for carrying out their activities. No data is disclosed for commercial purposes.

Text messages to registered persons are sent via a Swiss service. Otherwise no personal data is submitted or transferred outside the European Union or European Economic Area.

8. Principles of protecting the register

Physical material is stored in locked premises with access only by persons authorised to access the data.

Electronic material is stored in a data centre which meets the requirements for processing personal data. The connection from the user's browser to the server is encrypted. Only a restricted group of the Controller's and subcontractors' personnel who need and process data required for organising the General Meeting have access to the register.

9. Storage and erasure of personal data

Innovatics Ltd stores the personal data for a maximum of one year after the close of the General Meeting.

Euroclear Finland Ltd stores the personal data for a maximum of four months after the close of the General Meeting.

The minutes of the General Meeting and the list of votes appended thereto are stored permanently. It contains the names of the shareholders who participated in the General Meeting, the names of any representatives or assistants, numbers of shares and votes as well as the numbers of voting tickets.

All other information is destroyed when it is no longer needed for drawing up or verifying the minutes.

10. Data subject's rights

A data subject has the right to know what personal data is stored on them in the register. A data subject has the right to request rectification, erasure or supplementation of their data. Any requests shall be addressed in writing to the contact person named above under section 1.

A data subject has the right to lodge a complaint with the Data Protection Ombudsman if they have something to comment regarding the processing. Instructions for lodging a complaint can be found on the Data Protection Ombudsman's website at <https://tietosuoja.fi/>