

## PRIVACY STATEMENT

This privacy statement describes the processing of personal data related to Robit Plc's General Meeting.

Updated on 21 February 2024

### 1. Controller and contact information

**Register controller:**

Robit Plc  
0825627-0  
Vikkiniityntie 9  
33880 Lempäälä  
Finland

**Contact person:**

Violetta Silver  
c/o Robit Plc  
Tel. +358 45 202 0252  
Email: [violetta.silver@robitgroup.com](mailto:violetta.silver@robitgroup.com)

### 2. Name of the register

Robit Plc's register of general meetings.

### 3. The purpose and legal basis for processing personal data

The purpose of processing personal data is to enable carrying out the General Meeting of the controller in accordance with the law.

Personal data are processed only for the purposes necessary for the organisation of the General Meeting, such as to verify the identity of the registrant and their right to participate, preparing a list of participants, a list of votes and possible voting tickets, organizing any voting, and manage possible preliminary questions and requests to be heard.

The technical implementation of the registration system, General Meeting hall bookkeeping and possible advance voting and/or possible voting during the General Meeting is carried out by Innovatics Oy. The list of shareholders is maintained by Euroclear Finland Oy. Inderes Oyj is responsible for the General Meeting service in its entirety. In addition, other service providers are used when needed.

The legal basis for the processing of personal data is in particular the compliance with the legal obligations to which Robit is subject, based on the Finnish Companies Act (624/2006) and other legislation. Personal data may also be processed on the basis of legitimate interest of Robit or a third party, in which cases the legitimate interest is in particular justified purposes related to the business of Robit, such as administrative activities, ensuring of physical security, protection of property, investigation of misuse, as well as potential merger and acquisition activities.

The provision of personal data as specified in this Data Protection Notice is necessary in order for Robit to fulfil its legal obligations. Should the data subject not provide his/her personal data to Robit as described in this Data Protection Notice, the sending and handling of the shareholder's registration is not possible, which means that the data subject cannot participate in the Annual General Meeting.

#### **4. Processed personal data**

The processed personal data includes the shareholder's and their possible proxy's name, personal identity number and/or business ID, address, contact details, number of shares and votes, voting information, authentication method, basis of representation, date of registration, and possible information on aid, power of attorney, preliminary questions, and any additional information provided in connection with the registration. When participating in the General Meeting, the time of arrival and departure of each participant are recorded. For technical maintenance and monitoring of the service, log data on registration and voting, as well as the user's IP address are also recorded.

The register contains the list of shareholders on the record date created by Euroclear Finland for the General Meeting, containing, e.g., the shareholder's name, personal identity number/business ID, address, and number of shares.

The register contains a temporary list of shareholders created by Euroclear Finland for the General Meeting, containing information on nominee registered shareholders registered for the General Meeting and their number of shares.

#### **5. Regular sources of data**

Personal data is mainly collected from the shareholder themselves or from their representative in connection with the registration to the General Meeting. When registering via e-mail, mail or telephone, the controller or Innovatics Ltd enters the registrant's personal data and possible advance votes into the register.

Based on the personal data provided in connection with the registration, Innovatics Ltd retrieves the number of shares of the shareholder on the record date from the list of shareholders created by Euroclear Finland.

Innovatics Ltd enters the voting instructions for nominee registered shareholders represented by account operators at the General Meeting into the register.

## **6. Disclosures and transfers of personal data**

The list of votes contains information on the name of the shareholder and possible proxy and/or aid, number of the vote ticket (participant number), number of shares by share class, number of votes, basis of representation and means of attendance.

In accordance with the Limited Liability Companies Act, a list of shareholders is displayed at the General Meeting containing the names of the shareholders, the municipality and the number of shares and votes on the record date of the meeting. The list also contains information on nominee registered shareholders who are temporarily registered in the list of shareholders for the General Meeting.

## **7. Transfer of data to third parties and outside the EU or the European Economic Area**

Robit may disclose personal data to competent authorities when required to do so under the applicable laws, to prepare for legal proceedings or to defend a claim within the limits permitted or required by the applicable laws from time to time. If Robit reorganizes its business, personal data may be disclosed to the purchaser candidates and their representatives in accordance with the applicable law from time to time.

The data contained in the register may be shared with third parties involved in organizing the General Meeting who need the registered data in their operations. Data is not disclosed for commercial purposes.

Text messages to Finnish phone numbers will be sent to those registered in Finnish through the service. Text messages for those with international numbers, text messages are sent using a Swiss service.

Otherwise, personal data is not transferred or disclosed outside the EU or the European Economic Area.

## **8. Basis for register protection**

Physical material is stored in a locked room accessible only to persons entitled to the data.

Electronic material is stored in a data room that meets the requirements for the processing of personal data. The connection from the user's browser to the server is encrypted. Access to the register is limited to the employees of the controller and subcontractors who need and process data to organise the General Meeting.

## **9. Storage and deletion of personal data**

Innovatics Ltd stores personal data for a maximum of two years after the end of the General Meeting.

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

The minutes of the General Meeting and the list of votes attached thereto are stored permanently. It includes the names of shareholders who participated in the General Meeting, the names of potential proxies and aids, the number of shares and votes, and the numbers of the voting tickets.

Other data is destroyed when it is no longer necessary to draw up the minutes or to verify their accuracy.

## 10. Rights of the data subject

The data subject may use the rights related to the processing of his/her personal data specified below with regard to Robit. The exercise of the rights is a personal right of the data subject and requires identification.

- Right of access: The data subject has the right to obtain a confirmation from Robit on whether Robit processes personal data concerning the data subject, as well as the right to access such data. Robit may request the data subject to specify his/her request, amongst others, with regard to the details of the data to be delivered.
- Right to rectification: The data subject has the right to obtain from Robit the rectification of inaccurate personal data concerning him/her processed by Robit, and to have incomplete personal data processed by Robit to be completed.
- Right to be forgotten: The data subject has the right to obtain from Robit the erasure of personal data related to him/her. Robit has the obligation to erase such data in case there is no longer a legal ground for the processing of such data and the legal obligation binding Robit related to the storing of the personal data has terminated.
- Restriction of processing: In certain cases, prescribed by law, the data subject has the right to obtain from Robit restriction of processing of his/her personal data.
- Right to object to processing of personal data: In certain cases, the data subject may have the right to object to processing of his/her personal data. The right to object is applicable in such situations in particular where the processing of personal data is based on the controller's legitimate interest. In such situations, Robit has to comply with the data subject's request, unless Robit demonstrates compelling legitimate grounds for the processing, which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

The requests shall be directed to the contact person mentioned in Section 1 above.

The data subject has the right to lodge a complaint with the Data Protection Ombudsman if they have objections to the processing of personal data. The instructions are found on the website of the Data Protection Ombudsman at <https://tietosuoja.fi/>.