

# Privacy Notice – Annual General Meeting 2023

## 1. Data Controller and its Contact Details

Multitude SE  
Business ID: 1950969-1  
Postal address: Ratamestarinkatu 11 A, 00520 Helsinki, Finland  
Telephone number: +358 9 4245 2356

## 2. Contact Details of the Data Protection Officer

In case of questions related to the processing of personal data and situations related to the exercise of the data subjects' rights, the data subjects should contact the data controller. The data subjects can use their rights by sending an e-mail message to [dpo@multitude.com](mailto:dpo@multitude.com).

## 3. Purposes of and Legal Basis for Processing Personal Data

The data subjects whose personal data will be processed under this notice are the shareholders of the data controller as well as representatives of, or proxy representatives authorised by, such shareholders.

The processing of personal data is based on data controller's legal obligation to arrange the Annual General Meeting and carry out the related duties and on data controller's legitimate interest, e.g., to comply with the Finnish Corporate Governance Code, provided in case of legitimate interest that the interests or the fundamental rights and freedoms of the data subject are not overriding.

The processing activities carried out for such purposes include, for instance, processing related to (i) registration for the General Meeting, (ii) participation in the General Meeting at the meeting venue or by voting in advance, (iii) verifying the shareholder's/representative's identity and the right to attend the General Meeting, and (iv) preparing the list of participants and list of votes as well as advance voting.

Personal data will not be used for automated decision-making that would have legal or equivalent effects on the data subjects.

## 4. Collected Personal Data

Data subjects' personal data that can be processed include, inter alia, the following:

- Name
- Contact details (such as address, phone number and e-mail address)
- Personal identification number or date of birth
- Information related to proxies
- Number of shares and voting rights
- Number of book-entry account

## 5. Safeguarding Measures related to the Personal Data

Personal data is protected by appropriate technical, organisational and administrative security measures and is available only for persons authorised to access the data. The list of participants and list of votes referred to above will be retained as a part of the minutes of the meeting in the data controller's corporate records.

## 6. Retention Time of the Personal Data

Personal data is actively processed until the end of the Annual General Meeting and will be retained thereafter for a period as required under applicable regulation, including without limitation the Finnish Limited Liability Companies Act.

Computershare AB, who arranges the registration and advance voting for the meeting, will retain the data for 5 years after the end of the Annual General Meeting.

The list of participants and list of votes as well as the result of the advance voting will be enclosed to the minutes of the Annual General Meeting, and the minutes together with such appendices will be retained by the data controller for the duration of the data controller's operation and a period of at least 10 years from the end of

the last financial period as required under applicable regulation.

Any other data in the data controller's records will be retained for 5 years after the end of the Annual General Meeting.

## **7. Regular Sources of Data**

The data are mostly collected from the data subjects themselves or their representatives. Shareholders' personal data is also obtained from the shareholders' register maintained by Euroclear Finland Oy.

If the data subject refuses to provide such personal data, which is required to be provided based on legal obligation, he/she may not be able to participate in the Annual General Meeting and use his/her rights in the meeting.

## **8. Regular Disclosures of Data and Categories of Recipients**

The data controller does not, as a rule, disclose any personal data to third parties other than services providers who provide services to the data controller in connection with the Annual General Meeting, such as law firms, advisors or technical service providers working on the data controllers' behalf in connection with the meeting, including without limitation Computershare AB, who arranges the registration and advance voting for the meeting.

The data controller may also transfer personal data to such service providers, who processes personal data on behalf of the data controller, in accordance with applicable data protection legislation and the instructions of the data controller.

If you wish to have further information on the above-mentioned recipients of your personal data, please contact the data controller.

Personal data can also be disclosed to authorities, if the data controller has a legal obligation to do so.

## **9. Transfer of Data outside the EU or the EEA**

Personal data is not transferred outside the European Union or the European Economic Area. Some of the data controller's service providers may, in limited cases, offer certain support services in connection to which the data may be accessed also from outside the European Economic Area. In these situations, the data controller ensures an adequate level of protection for personal data through standard contractual clauses prepared by the European Commission or other transfer mechanisms allowed under the General Data Protection Regulation.

## **10. Rights of the Data Subjects**

Any requests under this Section 10 must contain sufficient details in order for the data controller to be able to comply with the request and must be delivered by email to the address indicated in Section 2 above.

### Right of the Data Subject to Access the Data

The data subjects have a right of access to their data and a right to receive confirmation from the data controller that no information concerning the data subject is included in the data file, in each case after having supplied sufficient search criteria. The request for access or confirmation must be made in accordance with the instructions given in this privacy notice.

The right of access can be refused on the grounds set out in law. Exercising the right of access is generally free of charge.

### Right of the Data Subject to Request Rectification, Erasure or Restriction of Processing of Personal Data

If the data subjects become aware of or observe an error in the data, they must rectify, erase or supplement any data contained in the register that conflicts with the purpose of the register or is incorrect, unnecessary, incomplete or outdated on their own initiative and without undue delay if they are able to do so on their own.

If the data subjects cannot rectify the data on their own, they must request rectification in accordance with Section 10 in this privacy notice.

If the data controller refuses a data subject's request to rectify an error, the data controller must provide the

data subject with a written statement which includes the reasons for the refusal.

#### Right of the Data Subject to Object to Processing of Personal Data

The data subjects have the right to object to processing of their personal data by the data controller on grounds related to their particular situation, if the processing is based on the data controller's legitimate interest.

The data subjects can make their objection in accordance with Section 10 of this privacy notice. When presenting their request, the data subjects must specify the particular situation based on which they are objecting to processing. The data controller can refuse to comply with the objection on the grounds set out in law.

#### Right of the Data Subject to Obtain Restriction of Processing

On certain grounds, as further specified in Article 18 of the General Data Protection Regulation, a data subject has the right to request the data controller to restrict the processing of his/her personal data. The request must be made in accordance with Section 10 of this privacy notice.

A data subject may request such restriction, e.g., when he/she is waiting for the data controller's response to a request for the rectification or erasure of the data or when the data subject has objected to the processing of his/her personal data and is awaiting verification as to whether the interests of the controller override the interests of the data subject.

If processing is restricted, the data controller may store the data but in principle may not process it otherwise.

#### Right of the Data Subject to Lodge a Complaint with a Supervisory Authority

The data subject has the right to lodge a complaint with the competent supervisory authority if the data controller has not complied with the data protection regulations applicable to its operations. Further information is available at [www.tietosuoja.fi/en](http://www.tietosuoja.fi/en).