

# Privacy statement concerning VMP's General Meeting register

## 1 Controller

VMP Plc  
Business ID: 2854570-7  
P.O. Box 901, 20101 Turku  
[www.vmpgroup.fi](http://www.vmpgroup.fi)

## 2 Contact details of the person responsible for data protection

Attorney Otto Michelsen  
c/o Varamiespalvelu-Group Oy  
Tel. 09 4242 1559  
Email: [tietosuoja@vmp.fi](mailto:tietosuoja@vmp.fi)

## 3. Register name

VMP Plc's Extraordinary Meeting register 2019

## 3 Privacy statement description

This privacy statement in accordance with Articles 13 and 14 of the General Data Protection Regulation (679/2016/EU) describes how the controller processes the personal data of *the persons who have notified of their attendance at VMP Plc's Extraordinary General Meeting, to be held on August 22, 2019.*

The group of data subjects consists of VMP Plc's shareholders and persons they have authorized, who can be either private individuals or representatives of organizational shareholders. Similarly, personal data can be gathered from any assistants to the aforementioned individuals.

In accordance with this privacy statement, VMP Plc may outsource processing of personal data to service providers or subcontractors, in which case VMP Plc will ensure through adequate contractual obligations that personal data is handled appropriately and in a legally compliant manner.

## 4 Personal data to be processed

When a shareholder registers to attend the General Meeting via the internet, Euroclear Finland Ltd is responsible for technical implementation of the data collection. The data connection between the user's browser and Euroclear Finland Ltd's server is SLL encrypted. Through this service, the following personal identification data may be gathered:

- Name
- Personal identification number

- Address
- Phone number
- Email address
- Book-entry account number
- Data subject's position (for example, authorized representative, shareholder, assistants) and authorizations
- Number of shares and votes held
- Time and method of registration
- Other possible information self-reported by the data subject

The book-entry account number is only used for identification within Euroclear Finland Ltd's system, and it is not disclosed to the controller. As the controller, VMP Plc may receive the voting information of an individual shareholder in order to review the validity of the voting result.

The aforementioned personal identification data, with the exception of the book-entry account number, must be provided when registering by mail. The data is retained in Euroclear Finland Ltd's system.

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

When registering online, a person submits information personally on themselves. Based on the personal identification number provided, the registration system compares provided information with VMP Plc's shareholder register maintained by Euroclear Finland Ltd and retrieves the person's ownership information from the shareholder register. When authorizing another person, the registering person provides the necessary personal data on the authorized person, as well.

In case a person registers by mail, a VMP Plc employee reviews the registering person's ownership information from the shareholder register and saves the data required for registration in a system maintained by Euroclear Finland Ltd.

## **6 Purpose and legal basis for the processing of personal data**

Personal data is gathered when a person registers their attendance at VMP Plc's General Meeting in 2019. Euroclear Finland Ltd is responsible for the technical implementation of the registration service. Personal information is requested so that the person's identity and their right to attend the General Meeting can be verified.

The data is used for gathering information on attendance at the General Meeting and for verifying the registering person's identity and their eligibility to attend the General Meeting. The data is also used to draft the attendee list, voting register and voting ballots, and for the handling of a potential voting itself. Attached to the General Meeting's minutes will be an attendee list based on this register that consists of persons who will attend the General Meeting.

The attendee list contains no other data apart from the names of shareholders, possible authorized representatives and assistants, along with the number of shares and votes they hold.

Use of the register ends after the General Meeting. The processing of personal data has been outsourced to Euroclear Finland Ltd. If a shareholder registers by mail, the data from the mail registration is entered into a system maintained by Euroclear Finland Ltd. The data connection between the user's browser and Euroclear Finland Ltd's server is SSL encrypted.

VMP Plc's legal obligations form the primary basis for the processing of the personal data of the data subjects, as specified in the obligations regarding the organization of a General Meeting in the Finnish Limited Liability Companies Act (624/2006, as amended) and other applicable legislation. Disclosure of data is necessary in order to comply with statutory obligations.

## **7 Disclosure and transfer of personal data**

Personal data will not be disclosed or moved outside of the European Union or the European Economic Area, nor to international organizations.

VMP Plc may be obligated to disclose personal data to service providers it employs, such as to those providing IT and legal advice services.

VMP Plc will not disclose a data subject's personal information to third parties for use in direct marketing, market research or for similar purposes.

VMP Plc may be obligated, in an emergency or other unexpected situation, to disclose a data subject's personal data in order to protect human life, health and property. In addition, VMP Plc may be obligated to disclose data subject's personal data in case VMP Plc is party to legal proceedings or to proceedings in other arbitration bodies.

In case VMP Plc is party to a merger, asset deal or other corporate transaction, it may be obligated to disclose a data subject's personal data to third parties.

Disclosure of data to third parties takes place primarily through electronic data connections, but data can also be disclosed by other means, such as via telephone or mail.

## **8 Protection of personal data**

VMP Plc processes personal data in a way that aims to ensure that it is appropriately secured, including protection from unauthorized handling, accidental loss, destruction or damage.

### **A. Manual material**

1. Manual documents relating to registration (manual material) is held in a locked space at VMP Plc's head office, where access to the register is held only by individuals working at VMP Group who are involved in arranging the General Meeting and who are bound to an obligation to maintain secrecy;

2. For required parts, the manual material is transferred by individuals involved in arranging the General Meeting to an electronic database regulated by principles specified below in part B; and

## B. Electronically processed data

1. Euroclear Finland Ltd is responsible for the technical implementation of data collection and for maintaining the register.
2. Data traffic between the user's browser and Euroclear Finland Ltd's server is encrypted (SSL). The website employs technical data protection, which ensures that entered data remains unaltered and is available only to those authorized to access it.

## 9 Retention period of personal data

The data subject's personal data is stored only for as long as it is necessary for the implementation of the purposes specified in this privacy statement.

The minutes and attendee list of the General Meeting and other material related to the General Meeting is retained permanently.

VMP Plc's shareholder list is updated continuously.

## 10 Rights of the data subject

The data subject has the following rights guaranteed by data protection legislation:

- The data subject has the right to request the data controller for access to their personal data and the right to request for the said data to be corrected. The request for correcting personal data must be specified in such a way that any error in the personal data can be observed and corrected easily.
- The data subject has the right to request the removal of personal data pursuant to and within the limits of data protection legislation.
- The data subject has the right to request the restriction of the processing of personal data and to object to the processing of personal data pursuant to and within the limits of data protection legislation.
- The data subject has the right to data portability or the right to receive their personal data in a structured and commonly used format and transfer them to another controller pursuant to and within the limits of data protection legislation.
- The data subject has the right to file a complaint with the local data protection authority (in Finland, [the Data Protection Ombudsman](#)) or another data protection authority in the European Union or the European Economic Area, if the data subject sees that the statutory rights related to the processing of their personal data have been breached.

The data subject may address requests to exercise their above-mentioned rights to the contact person in charge of data protection. The request shall be submitted in writing or electronically. The data subject's identity shall be verified before information is disclosed.

The request shall be responded to within a reasonable time period, no later than one (1) month from request's submission and the verification of the data subject's identity.

## **9 Changes to the privacy statement**

The controller continuously develops its business operations and, therefore, reserves the right to change this privacy statement by notifying about it in its services and on its website at <https://www.vmpgroup.fi/en/>. Changes may also be based on legislative changes. The controller recommends customers to check the content of the privacy statement regularly and from time to time.

This privacy statement has been published on July 31, 2019.