



## Privacy Policy

---

This is a privacy policy to meet the obligation outlined in article 13 of the General Data Protection Regulation ((EU) 2016/679) to provide information to shareholders as data subjects.

### Controller

eQ Plc (1625441-9) (hereinafter eQ)  
Address: Aleksanterinkatu 19 A, 5. floor, FI-00100 Helsinki  
Telephone: +358 (0)9 6817 8777  
Website: [www.eQ.fi](http://www.eQ.fi)  
Contact person: Risk and compliance department  
E-mail: [eQCompliance\(at\)eQ.fi](mailto:eQCompliance(at)eQ.fi)

### Name of register

eQ Plc's shareholder register

### Purpose of and lawful basis for processing personal data

eQ processes personal data in its shareholder register for the purpose of maintaining a list of shareholders and for the purpose of managing registrations for general meetings. The processing of personal data is based on eQ's legal obligation to keep a register of shares and their owners and to keep a record of shareholders who registered for general meetings. eQ does not use personal data for automated decision-making.

### Sources of personal data

eQ obtains the data on its shareholder register directly from the shareholders.

### Transfer and disclosure of personal data

eQ's shareholder register is maintained and managed by Euroclear Finland Oy. The information on the shareholder register is public as set out in the Companies Act (*Osakeyhtiölaki 624/2006*). In addition, public data on the shareholder register is disclosed to Eurolandcom Ab, which maintains the owner register on eQ's website. eQ does not disclose data pertaining to general meeting registrations.

### Transfer of personal data outside of the EU

eQ does not transfer data on its shareholder register outside of the EU. Information on eQ's hundred largest

shareholders is however publicly available on eQ's website.

### Storing of personal data

eQ stores data concerning registrations for general meetings on the shareholder register for 15 months from the date of the previous general meeting. As required by law, Euroclear Finland Oy permanently stores history data on eQ's shareholder register it maintains.

### Shareholder rights

The shareholder has the right to:

- access the personal data stored concerning him or her;
- rectify any inaccurate personal data concerning him or her;
- request the erasure of and have erased personal data concerning him or her;
- restrict the processing of personal data concerning him or her;
- object to the processing of personal data concerning him or her;
- transfer the personal data concerning him or her from one system to another; and
- prohibit the use of personal data concerning him or her in direct marketing and in certain other situations specified in the General Data Protection Regulation.

The shareholder may send a free-form request relating to the exercising of his or her rights to eQ at the address given at the top of this privacy policy. If the shareholder requests access to personal data concerning him or her, eQ will submit a copy of the personal data saved in the register either in written or electronic format, or specify a location where the data saved in the register is available to view without undue delay and, in any case, within one month from reception of the request. eQ may as necessary extend this period by a maximum of two months if the complexity and number of requests so requires. The shareholder will be notified in such cases.

The shareholder also has the right to lodge a complaint with a supervisory authority, especially in that EU member state in which she or he has permanent residence or employment, or where the alleged breach of the

General Data Protection Regulation has occurred. In Finland, the supervisory authority is the Data Protection Ombudsman.