

Data protection memorandum

Draft date: May 24, 2018

Finda Oy, shareholder register

1. Controller and contact information

Finda Oy
Logomo Byrå
Köydenpunojankatu 14
20100 Turku
Phone 044 011 0011
Email: seppo.haapasalo@finda.fi

2. Register name

Finda Oy: shareholder register

3. The purpose and legal basis of the processing of personal

data is the upkeep of Finda Oy's shareholder register.

The processing of personal data is necessary to comply with the legal responsibilities of the controller. In the processing of personal data, the controller complies with the applicable legislation, such as the Limited Liability Companies Act and regulatory provisions.

Finda Oy only processes the personal identification number of registered persons in situations, where unambiguous identification is important in carrying out tasks required by the limited Liability Companies Act or other legislation, or to fulfill the rights and duties of data subjects or the controller.

4. Data contents of the register

In the context of the register, the following data related to a shareholder of Finda Oy may be processed:

The shareholder's name, personal identification number, or other identification number, contact information, municipality of residence, citizenship, language, and demographic information (wage earner, retired, etc.), the number of shares, information that is the basis of book entries, as well as the party registered with the central securities depository, who manages the securities account where the shares are recorded, and information regarding trusteeships.

5. Regular data sources

- Data collected from the data subject, themselves
- Data reported to Finda Oy by Euroclear Finland Oy
- Personal data may also be collected and updated with data from the authorities or third parties, within the scope of applicable laws and for the purposes described in this memorandum. Names, addresses, mobile phone numbers, and death notices may be received from the Population Register Centre, as well as from other authorities and companies that provide update services.

6. Regular disclosures of data and their recipients

Finda Oy may disclose data from the shareholder register for direct marketing or market and opinion research, in case the data subject has not prohibited this type of disclosure.

7. Transmission of data outside of the EU or EEA

If the controller transmits personal data outside the EU or EEA, it complies with the requirements of the Data Protection Regulation, for example, by following the template agreements published by the EU commission.

8. Retention period of personal data

The retention period ends at the time that share ownership ends.

9. Principles of the register's protection

Physical material will be kept in locked storage areas. Data stored on data processing equipment is stored in systems that are protected by firewalls, passwords, and other technological methods. Finda Oy restricts use rights to systems containing personal data and supervises their use. The data processors are committed to an obligation of confidentiality.

10. Rights of data subjects

The data subject has rights to their own personal data in accordance with the Data Protection Regulation; the right to:

- access to their own personal data
- ask the controller to rectify deficient or erroneous personal data
- object to or restrict the processing of personal data, as well as to object to automatic decision-making
- request the controller to erase personal data, unless the controller can present a legal basis for the processing of personal data, despite the request.

Requests associated with these rights must be made by contacting one's own account operator or controller.

If the data subject considers their legal rights violated, they may file a complaint with the Data Protection Supervisor: Office of the Data Protection Ombudsman, PL 800, 00521 Helsinki, tietosuoja@om.fi.