

PRIVACY NOTICE

This privacy notice describes the personal data processing related to the General Meeting of Kempower Corporation.

Updated on 18 March 2022

1 **Controller and contact information**

Name: Kempower Corporation
Address: Hennalankatu 71, 15810 Lahti, Finland
Business ID: 2856868-5
Contact person: Pekka Snåre, Data Protection Officer
Contact details: pekka.snare@kempower.com

2 **Name of the register**

The General Meeting register of Kempower Corporation.

3 **The purpose and legal basis of personal data processing**

The purpose of processing personal data is to enable the General Meeting to be held in accordance with law and to organize an Investor Meeting.

Personal data will only be processed for purposes necessary for organizing the General Meeting and the Investor Meeting, such as enabling shareholders to register for the General Meeting and the Investor Meeting, verifying the identity of the shareholders and their right to attend the General Meeting, forming the list of participants in the General Meeting, the list of votes and the voting tickets, to organize a vote, to form resolutions of the General Meeting, to control questions asked in advance and requests to speak, and for possible other purposes related to organizing the General Meeting and the Investor Meeting.

The registration system and advance voting of the General Meeting are technically implemented and maintained by Innovatics Ltd. The shareholders' register is maintained by Euroclear Finland Oy.

The processing of personal data in relation to organizing the General Meeting is based on the fulfilment of the company's statutory obligations. The processing of personal identity code is based on identifying the data subject in order to perform the company's statutory duties provided in the Finnish Limited Liability Companies Act.

The processing of personal data in relation to organizing the Investor Meeting is the company's legitimate interest based on the purposes of use determined above.

4 **Personal data processed**

The personal data processed include the following identifying information of the shareholder and the potential representative of the shareholder, and the participants of Investor Meeting: name, personal identity code and/or business ID, address,

contact details, number of shares and votes, voting information, authentication method, basis of representation, date of registration, and information on potential representatives or assistants, proxy documents, questions asked in advance and other information given during the registration. Log information on registration and voting and the user's IP address are also stored for the technical maintenance and monitoring of the service.

The register contains the shareholders' register of the record date compiled by Euroclear Finland Oy for the General Meeting. This shareholders' register contains, inter alia, the name, personal identity code / business ID, address, and number of shares of the shareholder.

The register contains a temporary shareholders' register compiled by Euroclear Finland Oy for the General Meeting, which contains information on holders of nominee registered shares registered for the General Meeting and their number of shares.

5 Sources of personal data

Personal data is primarily collected from the data subjects themselves or their representatives in connection with the registration for the General Meeting and Investor Meeting. When registering by email or regular mail, the data controller or Innovatics Ltd enters the personal data and advance votes to the system. If the data subject intends to participate in the General Meeting, the provision of personal data is mandatory.

Based on the personal data provided in connection with the registration, Innovatics Ltd retrieves the number of shares of the shareholder from the shareholders' register of the record date of the meeting compiled by Euroclear Finland Oy.

Innovatics Ltd enters the voting instructions of the holders of nominee registered shares represented by account management organizations at the General Meeting to the register.

6 Disclosures of personal data

The list of votes and summaries of voting shall be compiled on the basis of the register's information, and they will be appended to the minutes of the General Meeting. The list of votes will only include the names of the shareholders and their possible representatives as well as the number of shares and votes.

In accordance with the Finnish Limited Liabilities Companies Act, the shareholders' register is available at the General Meeting, and it includes the name, municipality and number of shares and votes of the shareholders. This shareholders' register also contains information on holders of nominee registered shares who have temporarily registered to the shareholders' register due to the General Meeting.

7 Transfers of personal data to third parties and outside the European Union or the European Economic Area

Personal data from the register can be shared to such third parties that participate in the organization of the General Meeting and the Investor Meeting, and who need the information contained in the register for providing their services. Personal data is disclosed to third parties only to the extent it is necessary for processing of information. No personal data is disclosed for commercial purposes.

Personal data may also be required to be shared with competent authorities in accordance with legislation concerning the processing of personal data.

Text messages for registered participants are sent by a service provider located in Switzerland. Such personal data transfers to the service provider shall be made on the basis of Commission's adequacy decision 2000/518/EY. The Commission's decision is available at <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32000D0518&from=EN>. Personal data is not otherwise disclosed or transferred outside the European Union or the European Economic Area.

8 Principles of data security

Tangible material is kept under lock and key in a space to which only separately appointed persons have access.

Electronic material is stored in a data centre that meets the requirements for the processing of personal data. The communication connection from the user's browser to the server is encrypted. Access to the register is restricted to a limited number of employees of the controller and its subcontractors, who need and process personal data in order to organize the General Meeting and the Investor Meeting.

9 Retention of personal data and erasure

The controller stores the personal data entered into the register until the purposes specified in this privacy notice have been fulfilled unless any legislation sets an obligation to store the data longer.

Innovatics Ltd stores personal data for a maximum of one year 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 annexed to it and other material related to the General Meeting will be stored throughout the operational life of the controller in order to comply with statutory obligations. This contains the names of the shareholders and their potential representatives and assistants who participated in the General Meeting, number of shares and votes and the numbers of voting tickets.

Other information shall be destructed when it is no longer needed for drafting the minutes or to ensure the legality of the minutes.

10 Rights of the data subject

The data subject has the right, at any time, to access his/her data contained in the register. The data subject also has the right to request that his/her information is rectified, supplemented, or erased in accordance with and within the limitations placed by applicable data protection legislation. In addition, within the limitations placed by applicable data protection legislation and in accordance with the foregoing, data subjects have the right to request the restriction of processing of personal data and object to the processing of personal data. Potential requests shall be made in writing to the contact person mentioned above in Section 1. Prior to processing the data subject's request, the data subject may be asked to specify his/her request in writing and to verify his/her identity. The controller may also refuse to fulfil the data subject's request on grounds set out in applicable data protection legislation.

Data subjects also have the right to lodge a complaint with the supervisory authority, the Finnish Data Protection Ombudsman, if they have any remarks regarding the processing of personal data. Further information on this can be found on the website of the Office of the Data Protection Ombudsman at <https://tietosuoja.fi/en/home>.