

PRIVACY STATEMENT

This privacy statement describes the processing of personal data in connection with Terveystalo Plc's shareholder register and the records of general meetings.

1 Controller

Terveystalo Plc (hereafter "Terveystalo" or the "Company")
Jaakonkatu 3 A, 00100 Helsinki, Finland
AGM@terveystalo.com

2 Person responsible for issues relating to the registers and / or contact person:

Terveystalo Legal
AGM@terveystalo.com

Data Protection Officer
privacy@terveystalo.com

3 Names of the registers

Terveystalo Plc's shareholder register and records of Terveystalo Plc's general meetings

4 Purpose and the legal basis for processing of personal data

The purpose of the processing of personal data is to maintain the shareholder register, as defined in the Finnish Companies Act (624/2006), and records of Terveystalo's general meetings and to use the information contained therein for regulatory purposes. Shares in Terveystalo are in the form of book-entry securities in the book-entry system maintained by Euroclear Finland Oy. The maintenance of the book-entry register is regulated by the Finnish Act on the Book-Entry System and Settlement Activities (348/2017). The privacy statement of Euroclear Finland Ltd concerning the book-entry register can be found at https://www.euroclear.com/dam/EFi/Legal/CSDR/Arvo-osuusrekisteri_eng1.pdf.

The processing of personal data is also based on the implementation of so-called legitimate interests. Such processing is necessary, for instance, when clarifying the contact details required to contact a shareholder in order for them to exercise their rights and obligations, or in order to provide information about matters pertaining to general meetings.

5 Collected personal data and information sources

The following personal data shall be recorded in the shareholder register in the book-entry system:

- Name of the shareholder or nominee shareholder
- Personal identity code or another unique identifier

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- Contact, payment and taxation details
- Number of shares by share class
- Name of the central security depository in whose book-entry account the shares are registered
- Historical information of the shares and information on dividends paid

For the purposes of general meetings, a shareholder register of shares belonging to a book-entry system on the record date of the general meeting and a list of shareholders, their assistants, and proxy representatives registered and participated in the general meeting are maintained. The registers related to the general meeting contain the following personal data of the shareholder:

- Name
- Personal identity code/Business ID
- Contact information (address, telephone number, email address)
- Number of the book-entry account
- Number of shares and votes
- Votes on the agenda items

In addition, the following personal information is recorded of any possible assistant and proxy representative of a shareholder: name, personal identity code or date of birth, contact details (address, telephone number, email address).

Personal data for Terveystalo's shareholder register is recorded from the book-entry system. Personal data for the lists of general meetings is obtained from the shareholder register. In addition, personal data is collected mainly from the shareholders themselves or the persons acting on their behalf or on their account upon registering, participating, voting or otherwise using shareholders' rights in the general meeting. Similarly, data concerning the assistant or the proxy representative of a shareholder is collected mainly from themselves.

6 Recipients of personal data

The following information regarding the shareholder, provided by Euroclear Finland Ltd, can be obtained from the shareholder register of Terveystalo: name, address or domicile, date of birth, nationality, shareholding information, amount of waiting lists included, reason for being listed in a waiting list and information of possible joint owners of the shares. A temporary shareholder register drafted for the general meeting is, in accordance with the rules of Euroclear Finland Ltd, public for the date of the general meeting and for the following three business days. A list of attendees to the general meeting may, in accordance with the Finnish Companies Act, be disclosed as a part of the general meeting material of Terveystalo.

In principle, Terveystalo does not disclose personal data to any third party other than Euroclear Finland Ltd. Euroclear Finland Ltd is the technical implementor of the registration and voting system for the general meeting. Euroclear may disclose data from the shareholder registers for direct marketing purposes and for marketing surveys and opinion polls, unless such disclosure has been forbidden by the data subject (for further information, please see https://www.euroclear.com/dam/EFi/Legal/CSDR/Arvo-osuusrekisteri_eng1.pdf).

Personal data may also be disclosed where disclosure is necessary to safeguard the rights of the controller, data subject or others, investigate fraud or respond to requests from authorities.

7 Transfer of data outside the EU or the European Economic Area

Personal data may be transferred outside the European Union or the European Economic Area as permitted by applicable legislation. In such case, personal data is transferred by using the EU Commission Standard Contractual Clauses or another permitted transfer mechanism under the data protection regulation.

8 Storage periods of personal data

Terveystalo stores personal data only as long as it is necessary for the purposes of the use of personal data or as long as required by the storage periods based on the applicable law.

Terveystalo stores the minutes of the general meeting, including the list of the attendees and votes (name and number of shares and votes), for the entire duration of the Company's operation in order to comply with statutory requirements.

Personal data pertaining to the book-entry register is retained indefinitely.

9 Protection of personal data

Terveystalo applies appropriate physical, technical, and administrative protection measures to protect data from misuse. These measures include, among others, controlling and filtering network traffic, using encryption techniques and safe data centers, appropriate access control, controlled granting of access rights and supervision of their use, instructing staff participating in personal data processing, and risk management related to the planning, implementation, and maintenance of our services. Terveystalo chooses its subcontractors carefully and uses agreements and other arrangements to ensure that they also process data in compliance with the law and good data protection practices.

10 Rights of the data subjects

Right of access

Data subjects have the right to obtain information on the processing of personal data and access data concerning themselves.

Right to rectification

Data subjects have the right to request the rectification of erroneous or incomplete data.

Right to erasure

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Data subjects have the right to request the erasure of their personal data. Requests for erasure are implemented within the limits permitted by the law.

Right to object or restrict processing

The data subjects have, in certain situations, the right to object to the processing of their personal data on grounds relating to their particular situation.

Data subjects have the right to request restricting the processing of their personal data if the data subject contests the accuracy of personal data. In such cases, the processing of the personal data is restricted for the duration of the investigation.

Right to data portability

Data subjects have the right to request their data to be transmitted from one system to another if such data has been provided by the data subjects themselves and if the processing of the personal data is based on consent or an agreement.

Right not to be subject to an automated decision-making

Data subjects have the right not to be subject to decisions based solely on automated processing of personal data, such as profiling, that have legal effects or similar effects on them. However, there are exceptions to this prohibition.

Right to lodge a complaint with a supervisory authority

A data subject has the right to lodge a complaint with the supervisory authority (in Finland Data Protection Ombudsman) if the data subject is of the opinion that data protection legislation has been infringed during the procession of personal data.

Requests pertaining to the rights of the data subjects can be made by contacting the following:

on matters pertaining to the shareholder register: privacy@terveystalo.com

on matters pertaining to the records of general meetings: AGM@terveystalo.com

If the request concerns information contained in the book-entry system maintained by Euroclear Finland Ltd, Euroclear Finland Ltd must be contacted in order to make such a request.