

## PRIVACY STATEMENT

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

### 1 Controller

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

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

Terveystalo legal  
[AGM@terveystalo.com](mailto:AGM@terveystalo.com)

Data protection officer  
[tietosuoja@terveystalo.com](mailto:tietosuoja@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 and records of Terveystalo's general meetings, as defined in the Finnish Companies Act (624/2006), and to use the information contained therein for statutory purposes. The purpose of the processing of personal data is also to enable and ensure the realization of the rights of the shareholders and their potential proxies at the general meeting.

The legal basis for the processing of personal data is necessity for Terveystalo Plc to comply with its legal obligation, namely its statutory obligation to arrange the annual general meeting. Personal data is processed in order to identify the shareholders, their share ownership and their right to attend the meeting, as well as in order to implement and ensure their rights to register for, participate in and to vote at the meeting, such as in order to draft the list of attendees at the meeting, the list of votes as well as the potential voting tickets, in order to arrange a potential vote as well as to manage potential questions and requests for the right to speak. The processing of personal data is also based on the exercise 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;
- 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; and
- historical information of the shares and information on dividends paid.

For the purposes of general meetings, a shareholder register of shares belonging to the book-entry system maintained by Euroclear Finland Oy on the record date of the general meeting and a temporary shareholder list prepared by Euroclear Finland Oy for purposes of the general meeting are prepared. Further, 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 and their potential proxy representative:

- 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
- Voting information
- Authentication method
- Basis of representation
- Date of registration
- Information on potential aid
- Information on potential power of attorney
- Information on potential preliminary questions
- Any additional information provided in connection with the registration

When participating in the general meeting, the time of arrival and departure of each participant are recorded. For technical maintenance and monitoring of the service, log data on registration and voting, as well as the user's IP address are also recorded by Innovatics Oy.

In addition, the name of a possible assistant of a shareholder is recorded.

Personal data for Terveystalo's shareholder register is recorded from the book-entry system maintained by Euroclear Finland Oy. 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.

When registering via e-mail, mail or telephone, the controller or Innovatics Oy enters the registrant's personal data and possible advance votes into the register. Based on the personal data provided in connection with the registration, Innovatics Oy retrieves the number of shares of the shareholder on the record date from the list of shareholders created by Euroclear Finland Oy. Innovatics Oy enters the voting instructions for nominee registered shareholders represented by account operators at the general meeting into the register.

## **6 Recipients of personal data**

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. Euroclear Finland Oy maintains the shareholder register of Terveystalo Plc. The shareholder register is public in accordance with the Finnish Companies Act. 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 preceding three business days.

At the general meeting, in accordance with the Finnish Companies Act, the shareholder register is made available, which includes the names of shareholders, municipality, and the number of shares and votes according to the record date of the meeting. The list also contains information on nominee registered shareholders who are temporarily registered in the list of shareholders for the General Meeting.

Based on the information in the register, a list of votes and a summary of the votes cast are established and attached to the minutes of the meeting. The list of votes contains information on the name of the shareholder and possible proxy and/or aid, number of the vote ticket (participant number), number of shares by share class, number of votes, basis of representation and means of attendance. 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. The privacy statement of Euroclear Finland Ltd concerning the book-entry register can be found at [https://www.euroclear.com/dam/EFi/Legal/CSDR/Book-entry\\_system\\_privacy\\_notice\\_2023\\_EuroclearFinland.pdf](https://www.euroclear.com/dam/EFi/Legal/CSDR/Book-entry_system_privacy_notice_2023_EuroclearFinland.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 other misconduct, or respond to requests from authorities.

## **7 Transfer of personal 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 of the shareholder and their potential representative and/or aid, basis for representation, information on powers of attorney, number of voting ticket (participant number), number of shares per type, number of votes and channel of participation), for the entire duration of the Company's operation in order to comply with statutory requirements.

Innovatics Oy retains personal data for a maximum of two years from the end of the general meeting.

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

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.

Date: 22 February 2024

**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 material 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 processing 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](mailto:privacy@terveystalo.com)

On matters pertaining to the records of general meetings: [AGM@terveystalo.com](mailto:AGM@terveystalo.com)

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