



## DATA PROTECTION STATEMENT – RAPALA VMC OYJ ANNUAL GENERAL MEETING 2023

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Data Controller and contact details of the Data Controller
- Rapala VMC Oyj** (business ID: 1016238-8)  
Mäkelänkatu 87  
00610 Helsinki  
Finland
- [privacy@rapalavmc.com](mailto:privacy@rapalavmc.com)
- 2  
The purpose for processing the personal data
- Personal data is processed only for the organization and documentation of the Annual General Meeting, including the processing of any necessary registrations relating thereto. Personal data is processed, for example, in order to verify a person's identity, shareholdings and his/her right to attend the Annual General Meeting on 29 March 2023.
- Participation in the Annual General Meeting requires that the requested personal data is provided.
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Legal basis for the processing
- The processing of personal data is based on statutory obligations of the Data Controller in accordance with e.g. the Limited Liability Companies Act and Securities Markets Act.
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Contents of the register
- The following personal data are collected and processed as necessary in connection with the Annual General Meeting:
- Name
  - Identity number and/or business ID
  - Contact details
  - Date of registration
  - Log data on registration and voting
  - Book-entry account number
  - Number of shares and votes
  - Advance votes and voting instructions
  - Possible information about proxy representative, assistant, and power of attorney
  - Questions and counterproposals
- 5  
Retention period of personal data
- The personal data entered in or attached to the minutes of the Annual General Meeting shall be retained, in accordance with the Limited Liability Companies Act until further notice.
- Otherwise, personal data will be retained for as long as is necessary for the purposes mentioned in this Data Protection Statement, but no longer than one (1) year after the end of the Annual General Meeting.
- Additionally, as the case may require, the Data Controller may have to extend personal data retention on the grounds of establishment, exercise or defense of legal claims.
- The retention periods mentioned here do not affect the retention of similar personal data for purposes other than those mentioned in this Data Protection Statement, for example as part of a shareholder register.

6 Regular sources of information	<p>Certain arrangements relating to the Annual General Meeting such as electronic voting are carried out by Euroclear Finland Oy, to whom the collection and other processing of personal data has also been partly outsourced.</p> <p>Personal data is collected mainly from the person himself/herself (or his/her representative, assistant, or custodian) by Euroclear Finland Oy. Information on the ownership of the shares is collected from the shareholder register maintained by Euroclear Finland Oy.</p>
7 Recipients of personal data	<p>A shareholder register, including the names, municipality, and the number of shares and votes of the shareholders, will be displayed at the Annual General Meeting.</p> <p>Personal data is not regularly transferred to parties other than Euroclear Finland Oy and other service providers acting on behalf of the Data Controller in order to organize and document the Annual General Meeting.</p> <p>Further, the stipulations of applicable laws, ongoing legal procedures, or legal requests may require us to transfer personal data to authorities or other third parties.</p>
8 Data transfers outside the EU or the EEA	<p>Personal data will not be transferred outside the EU or the EEA by the Data Controller. Data Controller may transfer personal data to trusted third parties which process the data on behalf of the Data Controller. Such third parties may, in limited circumstances, e.g. when providing support functions, provide access to personal data from outside EU/EEA provided that an adequate level of protection will be maintained and appropriate additional safeguards will be taken.</p>
9 Data Security	<p>We apply strict and up-to-date data security means to protect your personal data. We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration and disclosure. Your personal data is protected by physical, organizational and technical means. Data is stored on secure servers, behind firewalls and when we are using our partners to process your personal data, we require them to follow the same rules that we follow. Only authorized persons are allowed to access the data and we keep up different kind of technical measures to protect the data and control the access. All of this is done to reduce any risk of loss, misuse or unauthorized access, disclosure or modification of your personal data in our possession.</p>
10 Rights	<p>A Data subject has the following rights in relation to the processing of their personal data:</p> <ul style="list-style-type: none"><li>- the right to be informed whether their personal data are being processed and, if so, the right to have access to or obtain a copy of the personal data</li><li>- the right to request inaccurate personal data to be rectified and incomplete personal data to be supplemented</li><li>- the right to request the restriction of the processing of personal data or the deletion of personal data</li><li>- lodge a complaint with a supervisory authority, which in Finland is the Office of the Data Protection Ombudsman (<a href="https://tietosuoja.fi">https://tietosuoja.fi</a>).</li></ul> <p>The applicable laws may contain restrictions and other provisions that relate to the above rights.</p> <p>Requests related to the aforementioned rights must be submitted to the Data Controller by contacting the contact person mentioned in section 2.</p>