

## DESCRIPTION OF THE PERSONAL DATA FILE General Meeting of Orthex Oyj

### **Controller and contact details**

Orthex Oyj, Suomalaihentie 7, 02270 Espoo Puh: +358 (0)19 329 61 Y-tunnus: 2727990-2

Contact person: Saara Mäkelä, saara.makela@orthexgroup.com

This description of the personal data file and data protection is available on the Company's website at: <https://investors.orthexgroup.com/extraordinary-general-meeting/>

### **The purpose of processing the personal data**

The personal data of shareholders and proxy representatives are processed for the purpose of collecting registrations and advance votes for the Extraordinary General Meeting of Orthex Oyj and for the purpose of ascertaining the registrants' right to participate in the Extraordinary General Meeting. Personal data are also processed for printing the list of represented shareholders and list of advance votes. In addition, the personal data may also be processed for other purposes related to arranging the Extraordinary General Meeting. A list of represented shareholders will be annexed to the minutes of the Extraordinary General Meeting. The list includes the names of the shareholders represented in the meeting, the names of possible proxy representatives and assistants, the amounts of shares and votes and the numbers of ballots. A list of shareholders, including the shareholders' names, addresses and the amounts of shares and votes, will also be displayed in the Extraordinary General Meeting. The processing of personal data is based on the legal obligation to organize an Annual or Extraordinary General Meeting.

### **Content of the register**

Only such personal information that is necessary for the purposes set forth above is being processed. Such information includes name, personal identity number, address, phone number, e-mail address, number of book-entry account, number of shares and votes as well as information on the possible assistant and/or authorized representative. If a Finnish directly registered shareholder registers and votes in advance on Internet, Euroclear Finland Ltd operates as the technical service provider for the collection of personal data. The number of the book-entry account is used only for the identification in the system of Euroclear Finland Ltd and it is not disclosed to the Company.

### **Regular sources of information**

When registering and voting in advance via Internet, the shareholder enters the data regarding himself / herself. Based on the personal identity number submitted, the system compares the data given with the shareholders' DESCRIPTION OF THE PERSONAL DATA FILE register of Orthex Oyj maintained by Euroclear Finland Ltd and extracts the ownership information from the shareholders' register. When making the electronic authorization, the shareholder shall also enter the necessary personal data of the proxy representative.

### **Regular disclosures of data and data transfers to countries outside the European Union or the European Economic Area**

Personal data is not regularly transferred to third parties or countries outside the European Union or the European Economic Area. However, the controller may use third parties, such as Euroclear Finland Ltd and Euroclear Sweden AB, to help processing the data in which connection data may be also transferred outside the EU or the European Economic Area. In such case it is ensured by contractual arrangements that personal data is processed in a secure manner and in accordance with the existing data protection legislation. Additionally, if necessary and within the limits allowed by the legislation, personal data may be disclosed to the authorities.

## **The principles of how the register is secured**

Manual register shall be stored in an area with restricted access. Euroclear Finland Ltd is responsible for the maintenance of the electronic register and the online registration and advance voting site. The connection from a user's browser to the server of Euroclear Finland Ltd is encrypted with SSL-technology. Only certain designated persons have access to the system by a user identification and password.

## **Retention period for personal data**

The data is kept only as long as it is necessary for the purposes set out in this statement or in accordance with the retention periods set forth in legislation.

## **Data subject rights**

The data subject has a right of access to the data on him/her in the personal data file, or the right to receive a notice that said file contains no such data. The data subject has also a right to ask for the data to be rectified or deleted within the limitations set out in and according to applicable data protection legislation; Further, the data subject may request restriction of processing within the limitations set out in and according to applicable data protection legislation. Questions and requests shall be made to Saara Mäkelä. Please see the contact information above. The data subject is upon its discretion entitled to file a complaint with a supervisory authority regarding the processing of the personal data by the controller.

June 8<sup>th</sup> 2021