

## Privacy notice – Subscription List Register

1. Data controller	Aktia Alexander Corporate Finance Oy Pohjoisesplanadi 37 A, 00100 Helsinki Puh. 010 292 5810
2. Contact person in matters involving the register	Antti Nummela Phone: +358 10 292 5810info@alexander.fi
3. Name of register	Subscription list register of Aktia Alexander Corporate Finance Oy
4. Purpose and basis of processing personal data	<p>Aktia Alexander Corporate Finance Oy ("<b>Alexander</b>") stores and processes register data for management of subscription lists and for registering subscribed securities to book-entry accounts of the subscribers. Alexander does not use the data for other purposes.</p> <p>The processing of personal data is based on the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract, compliance with a legal obligation to which the controller is subject, data subject's consent or legitimate interests pursued by the controller or by a third party.</p> <p>The provisions of the General Data Protection Regulation (2016/679) are applied to all processing of personal data as the general legislation on the matter. Applicable provisions of law are included also in the Act on Electronic Communications Services (917/2014).</p>
5. Processed data contents	<p>The register can contain the following information:</p> <ul style="list-style-type: none"> <li>• name</li> <li>• personal ID</li> <li>• address</li> <li>• phone number</li> <li>• email</li> <li>• book-entry account number, portfolio number and account management organization</li> <li>• bank account and bank</li> <li>• subscription and allocation information</li> <li>• person's ownership and voting right share in the subscribing company</li> </ul>

	<ul style="list-style-type: none"> <li>• person's position in the subscribing company</li> <li>• customer classification</li> <li>• marketing permission given in the connection with the transaction</li> <li>• one other identifier</li> </ul>	2/4
<b>6.</b> Regular sources of data	Data subjects themselves. The register data is received directly from the customers of initial public offering and other capital markets transaction subscription forms.	
<b>7.</b> Regular disclosure of data	<p>Alexander does not primarily disclose any information to third parties, except to the company issuing the shares or other parties of the share issue, such as e.g. a potential other organizer of the transaction, or an issuer agent named for the share issue in order to register the securities to the book-entry account of the subscribers.</p> <p>For the purposes stated in this privacy policy, the personal data may be disclosed, when necessary, and to selected third parties, such as third-party service providers. We take care of the agreements required by data protection regulation with the parties we use to process personal data.</p> <p>Data can be disclosed based on applicable legislation to authorities, such as tax and police authorities for e.g. taxation and other purposes related to reporting to authorities.</p>	
<b>8.</b> Transfer of data to countries outside the EU or EEA	Customer data is stored on servers located in the European Economic Area (EEA). No data is transferred to parties outside the EEA.	
<b>9.</b> Retention period	<p>Alexander or such personal data processor, to which Alexander has transferred processing duties of the personal data, retain register data in accordance with the applicable legislation only as long as storage of the data is required for the purpose of the personal data processing. When Alexander does not require the personal data any longer for the processing purposes, the data is deleted from the IT systems and other files of Alexander and the personal data processor or will be permanently anonymised.</p> <p>The aforementioned does not, however, apply to such personal data that is subject to mandatory retention period that Alexander is obligated to follow under the law. According to Act on Preventing Money Laundering and Terrorist Financing (444/2017) identifying data shall be retained in a reliable manner for a period of five years after the end of the permanent customer relationship. .</p>	
<b>10.</b> Your rights	The General Data Protection Regulation provides the data subject with several rights based on which the data subject can in many situation himself/herself decide on the processing of his/her personal data. The data subject may	

use the following rights with regard to Alexander to the extent Alexander acts as the controller to the personal data of the data subject in question.

- (i) **Right of access:** The data subject has the right to obtain a confirmation from the controller on whether the controller processes personal data concerning the data subject and the right to access such data. The data controller may ask the data subject to specify his/her access request, amongst others, with regard to the details of the data to be delivered.
- (ii) **Right to rectification:** The data subject has the right to obtain from the controller the rectification of inaccurate personal data concerning him/her processed by the controller, or to have incomplete personal data processed by the controller to be completed.
- (iii) **Right to be forgotten:** The data subject has the right to obtain from controller the erasure of personal data related to him/her and the controller has the obligation to erase such data in case there is no longer a legal ground for the processing of such data or, where the legal or contractual obligation binding the controller related to the storing of the personal data has ended or, where the data subject has withdrawn his/her consent to the processing of his/her personal data.
- (iv) **Restriction of processing:** In certain cases, where so prescribed by law, the data subject may have the right to obtain from the controller restriction of processing of his/her personal data.
- (v) **Right to data portability:** The data subject has the right to receive the personal data that he or she has provided to the controller in a structured, commonly used, and machine-readable format and, if desired, transmit that data to another controller. The right to data portability applies on the processing of the personal data based on consent or a contract.
- (vi) **Right to object to processing of his/her personal data:** In certain cases, the data subject may have the right to object to processing of personal data concerning him or her. The right to object is applicable in such situations in particular where the processing of personal data is based on the controller's legitimate interest. In such situations the controller has to follow the data subject's request, unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

	<p>All access or rectification requests should be addressed to the contact person defined in Section 2 of this privacy notice. Requests for deletion or transmission of the data or objection of processing of data should be addressed to the contact person defined in Section 2 of this privacy notice.</p> <p>Alexander will take measures based on the data subject's request without delay, and provide the data subject with the information concerning the measures related to the use of the data subject's rights primarily within one month from receiving the data subject's request.</p> <p>In addition, the data subject has the right to lodge a complaint with the supervisory authority on the processing of the personal data by the controller. The complaint shall be made to the competent supervisory authority, in Finland to the Data Protection Ombudsman, in accordance with its instructions.</p>
<p><b>11. Data security</b></p>	<p>We take commercially reasonable physical and technical measures to protect the personal data of the data subjects. For example, our IT systems use SSL-encryption and our servers are equipped with tools designed for prevention of denial of service attacks and viruses. All servers used by us are protected by passwords. Access to the personal data has been restricted to the individuals that have a right to access the data in question. Passwords are changed on a regular basis.</p> <p>If you believe that your personal data has been compromised, contact immediately the contact person defined in Section 2 above.</p>
<p><b>12. Amendments to the privacy statement</b></p>	<p>This privacy statement may be updated from time to time. The time of the most recent changes made to the statement can be found by referring to the "Last Updated" date on top of this page. We encourage you to familiarize yourself with the privacy statement regularly for any amendments. If we materially change the ways in which we use and disclose personal data, we will inform of it separately.</p>