

PRIVACY POLICY

NoHo Partners Plc

Prepared on: ___25 May 2020___

1. Controller	NoHo Partners Plc Business ID: 1952494-7
	Postal address: Hatanpään valtatie 1 B, FI-33100 Tampere, Finland Street address: Verkatehtaankatu 2, FI-33100 Tampere, Finland
2. Person in charge of the register and/or contact person	Sami-Petteri Rajala Business Controller NoHo Partners Plc
	sami-petteri.rajala@noho.fi +358 (0) 40 671 4257 Hatanpään valtatie 1 B, FI-33100 Tampere, Finland
3. Register name	Parties who sign up for NoHo Partners Plc's Annual General Meeting on 16 June 2020.
4. Purposes of the processing of personal data /purpose of use and grounds for the processing and storage of data	<p>The personal data of shareholders and the persons authorised by them are processed for arranging NoHo Partners Plc's Annual General Meeting on 16 June 2020, i.e. registration of participants, arranging advance voting, providing information to participants, verifying their identity and right to participate as well as other meeting arrangements. Furthermore, personal data is used for the printing of the list of participants and the list of votes as well as arranging and implementing voting slips and voting. Personal data may also be used for the execution of the rights and obligations prescribed to the Annual General Meeting in the Limited Liability Companies Act or NoHo Partners Plc's articles of association.</p> <p>The entire shareholders' register of NoHo Partners Plc is available for viewing in the Annual General Meeting, including the names, addresses and number of shares and votes of the shareholders.</p> <p>The list of participants will be added to the minutes of the Annual General Meeting as an appendix. The list will detail the names of all the participating shareholders, any proxy representatives and assistants, the number of shares and votes as well as the number of voting slips, if any. All the information recorded in the minutes of the Annual General Meeting or attached to it will be kept as a part of the minutes as required by the applicable legislation. Other unnecessary information will be destroyed after the Annual General Meeting when they are no longer needed for the preparation of the minutes or the verification of the information contained in it.</p> <p>The processing of personal data is primarily based on NoHo Partners Plc's legal obligations resulting from the obligations of the Limited Liability Companies Act and other applicable legislation regarding the organisation of the Annual General</p>

	<p>Meeting. The provision of information is necessary for the fulfilment of legal obligations, and failing to provide the information may lead to the refusal of the right to participate in the Annual General Meeting.</p> <p>NoHo Partners Plc will not use or utilise the personal data for any purpose other than the purposes required in connection with arranging the Annual General Meeting.</p>
<p>5. Data file content</p>	<p>The following information is collected on the persons registering for the meeting:</p> <ul style="list-style-type: none"> • name, personal identity code, phone number, e-mail address, postal address, name and personal identity code of the proxy representative, if any, name and personal identity code of the assistant, if any, number of shares and votes, voting data. <p>Innovatics Ltd and Inderes Oy are the technical partners for the practical arrangements and registration for the Annual General Meeting. When a participant registers in some other way than on the Internet, the controller will record the personal data of the participant registering for the Annual General Meeting in the registration system provided by Innovatics Ltd.</p> <p>The data connection from the user's browser to Innovatics Ltd's server is SSL-encrypted. NoHo Partners Plc has the opportunity to obtain the voting data of an individual shareholder in order to verify the correctness of the voting results.</p>
<p>6. Categories of data subjects and regular data sources</p>	<p>When a person registers on the Internet, they enter their information themselves. Based on the personal identity code provided, the system compares the information in Innovatics Ltd's Annual General Meeting system with NoHo Partners Plc's shareholders' register which is maintained by Euroclear Finland Oy and picks the ownership data of the registering person from the shareholders' register. When a person grants an authorisation, they also enter the required personal data of the authorised person.</p>
<p>7. Regular disclosure of the data and transfer of data outside the EU or the European Economic Area</p>	<p>In principle, the data will not be disclosed to third parties. The data will not be transferred outside the EU or the European Economic Area or to international organisations.</p>
<p>8. Principles of protecting the data file and confidentiality</p>	<p>NoHo Partners Plc processes personal data in a way seeking to ensure the appropriate safety of personal data, including protection against unauthorised processing and unintentional loss, destruction and damage. At each time, NoHo Partners Plc utilises the technical and organisational measures that are considered as acceptable in the field to ensure this. Only specifically designated persons who participate in the processing of said personal data due to their duties are able to process the personal data. All such persons are subject to secrecy.</p> <p>A. Manual materials: Registration by means other than on the Internet is recorded manually in the electronic system by NoHo Partners Plc and Innovatics Ltd according to the data disclosed by the person registering. All manual materials are destroyed after the annual general meeting.</p> <p>B. Electronically stored data: All the data entered in the system and the database are protected by means of usernames and passwords. The data connection from the user's browser to Innovatics Ltd's server is SSL-encrypted. Only authorised persons have access to the stored data. All electronically stored data are destroyed</p>

	<p>within one year from the annual general meeting.</p> <p>As far as the processing of personal data is outsourced to service providers or other subcontractors in accordance with this Privacy Policy, NoHo Partners Plc ensures, by means of adequate obligations included in the agreements, that personal data is processed as appropriate and legally required.</p>
9. Right to access personal data and execution of this right	<p>A shareholder and a proxy representative have the right to access their own personal data in the data file or obtain a confirmation that their data is not stored in the data file. A person who wishes to access their own personal data is requested to send a written request concerning this to NoHo Partners Plc, Hatanpään valtatie 1 B, FI-33100 Tampere, Finland, or sami-petteri.rajala@noho.fi. The information will be provided either in writing or in electronic format. The identity of the person making the request will be verified before the information is provided.</p>
10. Correction of data and execution of corrections	<p>A shareholder and a proxy representative have the right to request NoHo Partners Plc to correct, delete or supplement any data about them that is incorrect, incomplete, outdated or unnecessary. The correction request must be made in writing, providing sufficient details about the information to be corrected to allow the correction. The controller cannot correct any incorrect information received from the account operator without the account operator's contribution. The written correction request should be sent to NoHo Partners Plc, Hatanpään valtatie 1 B, FI-33100 Tampere, Finland or sami-petteri.rajala@noho.fi.</p>
11. Other rights of the data subject	<p>The data subject also has any other rights prescribed in the privacy legislation applicable at each time, such as the right to, with certain preconditions, transfer their data to another system and to restrict processing or object to the processing as well as to request that the data be deleted insofar as this is not prevented or restricted by mandatory legislation. These requests should, likewise, be made in writing, providing adequate details, and sent to NoHo Partners Plc, Hatanpään valtatie 1 B, FI-33100 Tampere, Finland or sami-petteri.rajala@noho.fi.</p> <p>Moreover, the data subject can always lodge a complaint concerning the processing of personal data with the Data Protection Ombudsman. Further information www.tietosuoja.fi/en.</p>