

# PRIVACY POLICY

NoHo Partners Plc

March 2023

1. Controller	NoHo Partners Plc Business ID: 1952494-7
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2. Contact person	Saara Lindberg Business Controller NoHo Partners Plc
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3. The purposes and grounds of processing personal data	<p>The personal data of shareholders and the persons authorised by them is processed for arranging NoHo Partners Plc's Annual General Meeting on 19 April 2023, i.e. registration of participants, organisation of advance voting, providing information to the participants, verifying their identity and right to participate as well as other meeting arrangements. The personal data is also used to print the list of participants (including the list of votes). Personal data may also be used for the execution of other 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 list of participants (including the list of votes) will be appended to the minutes of the Annual General Meeting, and it will detail the names of all the participating shareholders, any agents, the number of shares and votes as well as the number of voting slips. 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 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>Yhtiökokouksen ilmoittautumisjärjestelmän ja mahdollisen ennakkoäänestyksen teknisenä toteuttajana toimii Innovatics Oy. Osakasluetteloä ylläpitää Euroclear Finland Oy.</p> <p>NoHo Partners Plc and Innovatics Ltd will not use or utilise the personal data for any purpose other than the purposes required for arranging the Annual General Meeting.</p> <p>The personal data will not be used for automated decision-making that would have legal or equivalent implications for data subjects.</p>
4. Collected personal data	The personal information collected of the shareholder or his/her representative includes name, personal identity code or Business ID, phone number, contact information, number of shares and votes, voting data, method of identification, grounds of representation, registration date and information about a possible

	<p>assistant, proxy, advance questions as well as other information provided in connection to the registration.</p> <p>Innovatics Ltd and Inderes Oy are the technical partners for the practical arrangements and registration for the Annual General Meeting. The shareholders' register is maintained by Euroclear Finland Ltd.</p> <p>The data connection from the user's browser to Innovatics Ltd's server is 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>5. Regular data sources</p>	<p>When a person registers on the Internet, they enter their information themselves. When registering otherwise than on the Internet, the participant provides the information required for participation to NoHo Partners Plc or Innovatics Ltd., and NoHo Partners Plc or Innovatics Ltd. records the personal data of the registered person in the registration system. 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 Ltd 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 agent. Innovatics Ltd enters the voting instructions of nominee registered shareholders represented in the Annual General Meeting by custodian banks.</p>
<p>6. Regular disclosure of the data and transfer of data outside the EU or the European Economic Area</p>	<p>As a rule, personal data will not be disclosed to third parties or transferred outside the EU and/or the European Economic Area by NoHo Partners Plc. Innovatics Oy sends confirmation SMS messages to the registered participants via a Swiss service. Some of NoHo Partners Plc's service providers may operate outside the EU or the European Economic Area, in which case NoHo Partners Plc ensures the adequate level of protection of personal data by means of the model contract clauses of the European Commission.</p>
<p>7. Principles of personal data protection and storage of personal data</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>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> <p>A. Manual materials: Appropriate measures will be taken to protect manual materials and only authorised persons have access to them. All manual materials will be 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 encrypted. Only authorised persons have access to the stored data. All Innovatics Ltd's electronic materials will be destroyed within one year of the Annual General Meeting.</p> <p>Euroclear Finland stores personal information for no longer than four months after the Annual General Meeting.</p> <p>The storage period of personal data may also be extended if this is necessary for the establishment, exercise or defence of a legal claim.</p> <p>NoHo Partners Plc will store the minutes of the Annual General Meeting, which include the list of participants (including the list of votes) (including the following information: the name of the shareholder and any agent, the number of shares</p>

	and votes), throughout the company's operations and also thereafter for at least ten years after the end of the last financial year in order to comply with legal obligations.
8. Right to access personal data and execution of this right	A shareholder and an agent have the right to access their own personal data in the data file or obtain confirmation that their data is not stored in the data file or processed at all. A person who wishes to access their own personal data is requested to send a written request concerning this with the details required for searching for the information to NoHo Partners Plc, Hatanpään valtatie 1 B, FI-33100 Tampere, Finland, or <a href="mailto:gdpr@noho.fi">gdpr@noho.fi</a> . 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.
9. Correction of data and execution of corrections	A shareholder and an agent 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, and it must provide 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 <a href="mailto:gdpr@noho.fi">gdpr@noho.fi</a> .
10. 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 <a href="mailto:gdpr@noho.fi">gdpr@noho.fi</a>.</p> <p>The data subject can also always complain to the Data Protection Ombudsman about the processing of personal data. For further information, see <a href="http://www.tietosuoja.fi">www.tietosuoja.fi</a>.</p>