

## Privacy statement for general meeting

Date of preparation: 31 December 2025

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| <b>Controller:</b>   | Luotea plc (“ <b>Luotea</b> ”)<br>Business ID: 168014-0   |
| <b>Contact person in matters concerning the processing of personal data:</b> | Name: Luotea plc<br>Postal and street address: Kutomotie 2, 00380 Helsinki<br>Telephone: +358 (0)10 590 2000<br>Email: yhtiokokous@luotea.com   |
| <b>Legal basis for the processing of personal data:</b>                      | The processing of personal data is based on the fulfillment of Luotea's statutory obligation (Limited Liability Companies Act, Chapter 5, Sections 6, 6a and 7) and Luotea's legitimate interest to stream the extraordinary general meeting via video connection.  |
| <b>Purpose of the processing of personal data:</b>                           | The purpose of processing personal data is to hold the General Meeting. Personal data is processed for participant registration, communication, verification of identity and participation rights, as well as other meeting arrangements. In addition, the data is used to prepare the voting list and print ballot papers, organize any votes and advance voting, and fulfill other rights and obligations stipulated in the Limited Liability Companies Act and Luotea's Articles of Association. Participation in the General Meeting requires the provision of personal data as described in this privacy statement.  |
| <b>Data subject categories:</b>  | The shareholders registered for Luotea's general meeting as well as any shareholder having voted in advance.  |
| <b>Categories of personal data:</b>  | <p>The following information will be collected from the registered shareholders and their assistants and proxy representatives as applicable:</p> <ul style="list-style-type: none"><li>• shareholder's name, date of birth, shareholders personal identification number or Business ID</li><li>• address</li><li>• email address</li><li>• telephone number</li><li>• position of the participant (e.g. shareholder, agent)</li><li>• number of shares and votes</li><li>• voting information and possible voting instructions</li><li>• information on registration and participation, such as the time and means of registration, authentication method, the addressee of the notification, power of attorney, preliminary questions, information on any assistant and, if applicable, any specific accessibility or other needs of the participant as well as any additional information provided during registration</li><li>• the time of arrival and departure of each participant; and</li><li>• authentication log data and user's IP address.</li></ul> |

Luotea is entitled to receive the voting data on an individual shareholder to check the correctness of the voting results.

The list of participants and the summary of voting data attached to the minutes of the meeting are formulated based on the data.

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| <b>Regular sources of data:</b>                 | <p>The data is collected from the data subject itself or from their representative in connection with the registration to the general meeting.</p> <p>If the shareholder registers online, Innovatics Ltd is responsible for the technical implementation of the data collection. Based on the personal identity code, the registration system compares the information given with Luotea's shareholder register, maintained by Euroclear Finland Oy, and picks the ownership data of the registering shareholder from the shareholder register.</p> <p>When submitting a power of attorney or attending with an assistant, the necessary personal data must also be provided on such persons.</p>  |
| <b>Regular disclosure and transfer of data:</b> | <p>Personal data is shared to such third parties who are involved in the organization of the general meeting, and who require the data to fulfill their responsibilities. Due to this, some of the data is transferred on external service providers' servers to the extent necessary for delivering the service. The technical implementation of the registration system, general meeting hall bookkeeping and possible advance voting and/or possible voting during the general meeting is carried out by Innovatics Ltd. The list of shareholders is maintained by Euroclear Finland Oy. Inderes Oyj is responsible for the general meeting service in its entirety. Personal data is not disclosed for commercial purposes. Text messages to foreign numbers of persons to be attending the general meeting will be sent by a Swiss service provider. By decision of the European Commission, Switzerland is considered to ensure an adequate level of data protection. Otherwise, no personal data is disclosed or transferred outside the EU/EEC.</p> |
| <b>Principles of register protection:</b>       | <p>Electronic data is stored in a data center that is compliant with the requirements set out for the processing of personal data. Communication from the user's browser to Innovatics Ltd's server is encrypted. Data in physical form is stored in a locked space and can only be accessed by authorized persons.</p>   |
| <b>Data retention period:</b>                   | <p>Personal data recorded in or attached to the minutes of the General Meeting will be retained as part of the minutes in accordance with the requirements of the Finnish Companies Act. Other data will be deleted once it is no longer necessary for preparing the minutes or verifying the accuracy of the information contained therein.</p>  |
| <b>Rights of the data subject:</b>              | <p><i>Right of Access and Right to Request Rectification or Erasure</i></p> <p>The data subject has the right to inspect what information about them has been recorded in the register. In addition, the data subject has the right to request the correction of inaccurate information and the erasure of data. Requests for inspection, rectification, and/or erasure must be submitted in writing to the contact person of the register.</p> <p><i>Other rights</i></p> <p>In accordance with the General Data Protection Regulation (GDPR), the data subject has the right to object to the processing of their data or request the restriction of processing, as well as the right to lodge a complaint regarding the processing of personal data with the Data Protection Ombudsman.</p>  |