

Privacy statement for shareholder register

Updated 31 December 2025

Controller:	Luotea plc Business ID: 1680140-0
Contact details in matters concerning the register:	Name: Luotea plc Business ID: 1680140-0 Postal and street address: Kutomotie 2, FI-00380 Helsinki, Finland Telephone: +358 (0)10 590 2000 Email: tietosuoja@luotea.com
Name of the register:	Luotea Plc shareholder register
Legal basis for the processing of personal data:	The legal basis for the processing of personal data is the fulfillment of Luotea's statutory obligations (chapter 3, section 15 of the Limited Liability Companies Act).
Purpose of the processing of personal data:	The purpose of the processing of personal data is to maintain Luotea plc's list of shareholders.
Data subject categories:	Luotea plc shareholders
Data content of the register:	<p>The list of shareholders contains the following data:</p> <ul style="list-style-type: none">• shareholder (or nominee registration custodian) name• personal identification number, business ID or a similar identifier• contact, payment and taxation details• the number of shares by share class• the party of the central securities depository that manages the book-entry account the shares have been entered into <p>For the purposes of a temporary entry according to chapter 5, section 6 a of the Limited Liability Companies Act, the following data are stored in the list of shareholders:</p> <ul style="list-style-type: none">• name and address of the shareholder• the number of shares to be included in the list of shareholders by share class• personal identification number or another similar identifying factor according to the regulations of the central securities depository
Regular sources of data:	The data are retrieved directly from the data subject. Book-entry account operators authorized by Euroclear Finland Oy enter the data in the book-entry system maintained by Euroclear Finland Oy.
Regular disclosure and transfer of data:	Luotea's shares belong to the book-entry system, and its shareholder register is available for view to everyone at the office of the central securities depository, Euroclear Finland Oy. Everyone has the right to have a copy of all, or part of the shareholder register, against a fee.

The disclosure of information does not, however, concern the identification part of the personal identification number, payment or tax related information or information on the trading account into which the shares provided by the shareholder for sale have been entered.

If Digital and Population Data Services Agency has ordered a restriction on the disclosure of shareholder data (so-called security ban) pursuant to section 36 of the Act on the Population Information System and the certificate services of the Population Register Centre (661/2009) and Luotea has been notified of such restriction, then a home town, address and other information registered into the shareholder register can only be disclosed to the authorities. The contact address entered into Luotea's shareholder register of such shareholders may also be disclosed to non-authorities.

Luotea uses an external service provider, Euroclear Finland Oy, for the technical implementation and maintenance of the shareholder register and for the processing of personal data. Personal data will therefore be transferred to an external service provider to the extent necessary to implement the use of services. Luotea ensures the implementation of data protection by entering into a data processing agreement with the service provider processing personal data. In accordance with the data processing agreement, the service provider processes personal data only to the extent necessary to provide the services.

Transfer of data outside the EU or EEA: Personal data are deemed to be transferred outside the EU/EEC in connection with the provision of information technology services when the information can be accessed from EU/EEC. An agreement based on EU standard contractual clauses has been made with the service provider regarding the transfer.

Principles of register protection: Euroclear Finland Oy is responsible for the technological maintenance and performance of the register. The register is protected by technological measures to ensure that the entered data remains unchanged and accessible only to authorized people.

Data retention period: The data in the shareholder register is retained as long as there has not been any change in the shareholder information due to the change of ownership, after which the shareholder register is updated to reflect up-to-date owner information. Information related to the payments is stored in the register in accordance with the Accounting Act and the Advance Payment Act.

Rights of the data subject: *Right of inspection and right to request rectification or erasure of personal data*
Data subjects have the right to inspect their personal data entered in the register. In addition, data subjects have the right to request the rectification of inaccurate data and erasure of data. Inspection, rectification and/or erasure requests must be submitted in writing by using the above contact details.

Other rights

According to the General Data Protection Regulation data subjects have the right to object to or request a restriction on the processing of their personal data and to lodge a complaint regarding the processing of their personal data to the data protection supervisor.