



DATA PROTECTION STATEMENT – RAPALA VMC CORPORATION ANNUAL GENERAL MEETING 2024

1. Data Controller and contact details of the Data Controller	<p>Rapala VMC Corporation (business ID: 1016238-8)</p> <p>Mäkelänkatu 87 00610 Helsinki Finland</p>
2. Contact person in matters concerning the register	<p>privacy@rapalavmc.com</p>
3. The purpose for processing the personal data	<p>Personal data is processed only for the organization and documentation of the Annual General Meeting, including the processing of any necessary registrations relating thereto. Personal data is processed, for example, in order to verify a person's identity, shareholdings and his/her right to attend the Annual General Meeting.</p> <p>Participation in the Annual General Meeting requires that the requested personal data is provided.</p> <p>The technical implementation of the registration system for the general meeting, the advance voting and possible voting during the meeting as well as the management of the attendance records is carried out by Innovatics Ltd. The shareholder register is maintained by Euroclear Finland Oy. Inderes Oyj is responsible for the overall general meeting service. Additionally, other service providers may be used as needed.</p>
4. Legal basis for the processing	<p>Pursuant to the General Data Protection Regulation (EU 2016/679), the processing of personal data is based on statutory obligations of the Data Controller in accordance with the Limited Liability Companies Act (624/2006) and Securities Markets Act (746/2012).</p>
5. Contents of the register	<p>The following personal data are collected and processed as necessary in connection with the Annual General Meeting:</p> <ul style="list-style-type: none">• Name• Identity number and/or business ID• Contact details• Date of registration• Log data on registration and voting• Book-entry account number• Number of shares and votes• Advance votes and voting instructions• Possible information about proxy representative, assistant, and power of attorney• Questions and counterproposals <p>The time participants arrive to the meeting and depart it will also be recorded. Log data of registration and voting and the user's IP address will also be recorded for the purposes of the technical maintenance and monitoring of Innovatics Ltd's service.</p> <p>The register contains the list of shareholders at the record date created by Euroclear Finland Oy for the general meeting, which includes, among other things, the shareholder's name, personal/business ID number, address and the number of shares.</p> <p>The register contains a temporary list of shareholders at the record date created by Euroclear Finland Oy for the general meeting, which includes information on nominee-registered shareholders who have registered for the meeting and the number of their shares.</p> <p>In order to verify the correctness of voting results, the company has access to an individual shareholder's voting information.</p>
6. Retention period of personal data	<p>The personal data entered in or attached to the minutes of the Annual General Meeting shall be retained throughout the operational life of the company and for 10 years from the end of the financial year once the company's operations have been terminated in order to comply with the company's statutory obligations (chapter 2, section 10 of the Accounting Act (1336/1997)). All other data will be deleted, when they are no longer necessary for documenting the Annual General Meeting's minutes or checking for their accuracy.</p>



Otherwise, personal data will be retained for as long as is necessary for the purposes mentioned in this Data Protection Statement, but no longer than two (2) years after the end of the Annual General Meeting.

Additionally, as the case may require, the Data Controller may have to extend personal data retention on the grounds of establishment, exercise or defense of legal claims.

Euroclear Finland Oy stores the personal data for a maximum of four (4) months after the closing of the general meeting.

The retention periods mentioned here do not affect the retention of similar personal data for purposes other than those mentioned in this Data Protection Statement, for example as part of a shareholder register.

7. Regular sources of information

Personal data is primarily collected from the individual themselves or their representative during registration for the general meeting. When registering online, a shareholder enters information about himself or herself into the registration system. When registering in any other manner, the Data Controller or Innovatics Ltd inputs the registrant's personal information and any advance votes into the register.

Based on the personal information provided in connection with the registration, Innovatics Ltd retrieves the shareholder's share quantity from the shareholder register created by Euroclear Finland Oy for the record date of the meeting.

Innovatics Oy inputs the voting instructions for nominee-registered shareholders represented by custodian entities at the general meeting into the register.

8. Recipients of personal data

A shareholder register, including the names, municipality, and the number of shares and votes of the shareholders, will be displayed at the Annual General Meeting.

Personal data is not regularly transferred to parties other than Innovatics Ltd, Inderes Oyj, Euroclear Finland Oy and other service providers acting on behalf of the Data Controller in order to organize and document the Annual General Meeting.

Further, the stipulations of applicable laws, ongoing legal procedures, or legal requests may require us to transfer personal data to authorities or other third parties.

9. Data transfers outside the EU or the EEA

The information in the register may be shared with third parties involved in organizing the general meeting who require the data for their own operations. The information will not be disclosed for commercial purposes.

Text messages to individuals registered with Finnish phone numbers are sent through a Finnish service. For foreign numbers, text messages are sent through a Swiss service.

If shareholders are offered the right to use their speaking rights remotely during the general meeting, the speaking rights are facilitated through a U.S.-based service.¹ In this case, the service provider processes the IP address and name of the shareholder using the speaking rights remotely.

Otherwise, personal data will not be disclosed or transferred outside the EU or the European Economic Area.

10. Data Security

We apply strict and up-to-date data security means to protect your personal data. We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. Your personal data is protected by physical, organizational, and technical means. Data is stored on secure servers, behind firewalls and when we are using our partners to process your personal data, we require them to follow the same rules that we follow. Only authorized persons are allowed to access the data and we keep up different kind of technical measures to protect the data and control the access. All of this is done to reduce any risk of loss, misuse or unauthorized access, disclosure, or modification of your personal data in our possession.

11. Rights

A Data subject has the following rights in relation to the processing of their personal data:

- the right to be informed whether their personal data are being processed and, if so, the right to have access to or obtain a copy of the personal data

¹ Read more about Daily's application of GDPR and security at: <https://www.daily.co/security/gdpr/> and <https://www.daily.co/products/security-at-daily/>



- the right to request inaccurate personal data to be rectified and incomplete personal data to be supplemented
- the right to request the restriction of the processing of personal data or the deletion of personal data
- lodge a complaint with a supervisory authority, which in Finland is the Office of the Data Protection Ombudsman (<https://tietosuoja.fi>).

The applicable laws may contain restrictions and other provisions that relate to the above rights.

Requests related to the aforementioned rights must be submitted to the Data Controller by contacting the contact person mentioned in section 2.