

PRIVACY POLICY

This privacy policy describes the processing of personal data in connection with the Annual General Meeting 2023 of Kreate Group Plc.

Updated on 21 February 2023

1. Data controller	Kreate Group Plc (hereinafter referred to as "Kreate") Haarakaari 42 FI-04360 Tuusula Business ID: 2601364-3
2. Contact person	Mikko Laine Kreate Group Plc Phone: +358 50 599 9201 Email: mikko.laine@kreate.fi
3. Purpose and legal basis for processing personal data	<p>The purpose of processing personal data is to enable the conduct of the controller's Annual General Meeting in accordance with the law.</p> <p>Personal data is processed only for purposes necessary for the arranging of the Annual General Meeting, such as verifying the identity of the registrant and confirming their right to participate, drawing up the meeting's list of participants, list of votes and possible ballots, organising the voting as well as managing any advance questions and requests to speak.</p> <p>The list of votes and participants will be attached to the minutes of the Annual General Meeting. The list includes the names of shareholders participating in the Annual General Meeting by voting in advance, the names of possible agents as well as the number of shares and votes.</p> <p>Innovatics Ltd operates as the technical service provider for the Annual General Meeting's registration system and possible advance voting. The shareholder register is maintained by Euroclear Finland Oy.</p> <p>The processing of personal data set forth in this privacy policy is necessary for Kreate to fulfil its legal obligations set out in, for example, the Limited Liability Companies Act (624/2006, as amended) and the Securities Markets Act (746/2012, as amended).</p> <p>Providing information is a statutory requirement for attending the Annual General Meeting. Without such information it is not possible, in principle, to exercise the rights attached to the shares.</p> <p>Personal data will not be used for automated decision-making that would have legal or equivalent effects on the data subjects.</p>
4. Personal data to be processed	The personal data to be processed includes:

	<p>The shareholder's and their possible representative's name, personal identity code and/or business ID, address, contact details, number of shares and votes, voting information, method of identification, basis of representation, date of registration and possible information regarding an assistant, power of attorney, advance questions as well as any other additional information provided during registration. The time of arrival and time of departure of the meeting participants are also recorded. For the technical maintenance and monitoring of the service, log data on registration and voting as well as the user's IP address are also recorded.</p> <p>The filing system contains the shareholder register on the date of record created by Euroclear Finland Oy for the Annual General Meeting, which includes the shareholder's name, personal identity code/business ID, address and number of shares, for example.</p> <p>The filing system contains a temporary shareholder register created by Euroclear Finland for the Annual General Meeting, which includes information about the nominee-registered shareholders registered for the Annual General Meeting and their number of shares.</p>
<p>5. Retention and erasure of personal data</p>	<p>Kreate will retain the minutes of the Annual General Meeting and the attached list of votes and participants, which includes the name of the shareholder, the name of the possible agent and information on the number of shares and votes as well as the numbers of the ballots. The minutes and their attachments are retained as long as Kreate operates in order for Kreate to fulfil its statutory obligations.</p> <p>Innovatics Ltd will retain the personal data for a maximum of one year after the end of the Annual General Meeting.</p> <p>Euroclear Finland Oy will retain the personal data for a maximum of four months after the end of the Annual General Meeting.</p> <p>Other information will be disposed of when no longer needed to draft the minutes or to verify their accuracy.</p>
<p>6. Regular sources of data</p>	<p>As a rule, personal data is collected from the persons themselves or their representatives in connection with the registration for the Annual General Meeting. When registering via email, post or phone, the data controller or Innovatics Ltd enters the registrant's personal data and possible advance votes into the filing system.</p> <p>Based on the personal data provided during registration, Innovatics Ltd retrieves the shareholder's number of shares from the shareholder register on the date of record of the meeting created by Euroclear Finland Oy.</p>

	<p>Innovatics Ltd enters into the filing system the voting instructions for the nominee-registered shareholders represented by account management organisations at the Annual General Meeting.</p> <p>When a shareholder grants a power of attorney, the shareholder shall also provide the necessary personal data of the authorised representative.</p>
7. Recipients of personal data	<p>The data in the filing system will be used to compile the meeting's list of participants and voting summaries, which will be attached to the minutes of meeting.</p> <p>In accordance with the Limited Liability Companies Act, the shareholder register, which includes the name, municipality and number of shares and votes of the shareholders according to the date of record of the meeting, is kept available for viewing at the Annual General Meeting. The register also contains the information of the nominee-registered shareholders entered temporarily into the shareholder register for the Annual General Meeting.</p> <p>The requirements of applicable legislation may under certain circumstances also require the disclosure of personal data to the authorities.</p>
8. Data transfers to third parties and outside the EU or EEA	<p>Data from the filing system can be shared with third parties that participate in the arranging of the Annual General Meeting and that need the data in the filing system in their operations. Data is not disclosed for commercial purposes.</p> <p>A Swiss service provider is used for the delivery of text messages sent to registrants. The European Commission has stated that Switzerland ensures adequate protection for personal data (adequacy decision), which enables the transfer of data to the service provider in question. Otherwise, personal data is not disclosed or transferred outside the EU or the European Economic Area.</p>
9. Principles of personal data protection	<p>Kreate has implemented technical and organisational measures to ensure the security of data.</p> <p>Physical material is stored in a locked space to which only the persons entitled to the data have access.</p> <p>Electronic material is stored in a data centre that meets the requirements set for the processing of personal data. The connection from a user's browser to the server is encrypted. Access to the filing system is restricted to a limited number of employees of the data controller and subcontractors, who need and process the data in order to arrange the Annual General Meeting.</p>
10. Rights of the data subject	<p>The data subject has a right to receive information on whether their personal data is being processed. If the data is being processed, the data subject has a right to access the data concerning them. The data subject also has a right to ask for the data to be rectified or erased or for the processing to be restricted within the limitations set out in and in accordance with the</p>

	<p>applicable data protection legislation. However, Kreate may be under a legal obligation to retain certain personal data despite a request of erasure.</p> <p>The requests concerning exercising the rights shall be made to the contact person mentioned in this privacy policy. The request may be presented in free form using the contact details set out in section 2 of this privacy policy.</p> <p>The data subject is also entitled to lodge a complaint with the competent supervisory authority regarding the processing of their personal data, if the data subject considers that data protection legislation has not been complied with in the processing of their personal data. In Finland, the supervisory authority is the Finnish Data Protection Ombudsman (www.tietosuoja.fi/en).</p>
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