

Privacy statement

This privacy statement describes the processing of personal data related to Solwers Plc's (hereinafter referred to as "**Solwers**"), Annual General Meeting 2025.

1. Controller and contact information

Name	Solwers Plc
Address	Kappelikuja 2 b, 02200 Espoo
Business ID	0720734-6
Contact Person	Toni Santalahti
Contact Details	toni.santalahti(at)solwers.fi

2. The purpose and legal basis for processing personal data

The purpose of processing personal data is to enable carrying out the General Meeting of the controller in accordance with the law.

Personal data are processed only for the purposes necessary for the organisation of the General Meeting, such as to verify the identity of the registrant and their right to participate, preparing a list of participants, a list of votes and possible voting tickets, organizing any voting, and manage possible questions and requests to be heard.

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 Oy. The list of shareholders is maintained by Euroclear Finland Oy. Inderes Oyj is responsible for the General Meeting service in its entirety. In addition, other service providers are used when needed.

Processing of personal data is based on the legal obligations of the controller, particularly the statutory obligation of the data controller under the Limited Liability Companies Act (624/2006) to hold a general meeting, which also includes the obligation to prepare the minutes and voting list of the general meeting. If the data subject does not provide Solwers with their personal data in the manner described in this privacy statement, it will not be possible to submit and process the registration, which means that the data subject cannot participate in the General Meeting.

3. Processed personal data

The processed personal data include the shareholder's and their possible aid's name, the name of possible representative or proxy, personal identification number and/or business ID, address, contact details, number of shares and votes, voting information, authentication method, basis of representation, date of registration, and possible information on aid, power of attorney, and any additional information provided in connection with the registration. When participating in the General Meeting, the time of arrival and departure of each participant are recorded. For technical maintenance and monitoring of the service, log data on registration and voting, as well as the user's IP address are also recorded.

The personal data processed also include the personal data on the list of shareholders on the record date created by Euroclear Finland Oy for the General

Meeting, containing, e.g., the shareholder's name, personal identification number and/or business ID, address, and number of shares.

The personal data processed also include the personal data on a temporary list of shareholders created by Euroclear Finland Oy for the General Meeting, containing information on nominee registered shareholders registered for the General Meeting and their number of shares.

4. Regular sources of data

Personal data is mainly collected from the shareholder themselves or from their representative or aid in connection with the registration to the General Meeting. In addition to the shareholder, personal data may be received also from other sources, such as from comparisons made to Euroclear Finland Oy's register and public sources. When registering via e-mail, mail or telephone, the controller or Innovatics Oy additionally processes the registrant's personal data and possible advance votes.

Based on the personal data provided in connection with the registration, Innovatics Oy retrieves the number of shares of the shareholder on the record date of the General Meeting from the list of shareholders created by Euroclear Finland.

Innovatics Oy additionally processes the voting instructions for nominee registered shareholders represented by account operators at the General Meeting.

5. Disclosures and transfers of personal data

Based on the personal data processed, a list of votes and a summary of the votes cast are established and attached to the minutes of the meeting. The list of votes contains information on the name of the shareholder and possible proxy and/or aid, number of the vote ticket (participant number), number of shares by share class, number of votes, basis of representation and means of attendance.

At the general meeting, in accordance with the Limited Liability Companies Act, the shareholder register is made available, which includes the names of shareholders, municipality, and the number of shares and votes according to the record date of the meeting. The list also contains information on nominee registered shareholders who are temporarily registered in the list of shareholders for the General Meeting.

Since shareholder registers are fundamentally public, anyone can order Solwers' shareholder register or part of it via e-mail or inquire about ownership information by phone from Euroclear Finland Oy. Personal data may also be disclosed to other shareholders and third parties, for example, in connection with participation in the General Meeting or as part of the documentation prepared for the General Meeting.

Solwers also regularly discloses personal data to Euroclear Finland Oy based on legislation for the maintenance of the book-entry system. Solwers discloses personal data to a limited extent within its group, for example, to fulfill statutory reporting obligations.

6. Transfer of data to third parties and outside the EU or the European Economic Area

The processed personal data may be shared with third parties involved in organising the General Meeting who need the personal data in their operations. Solwers uses Euroclear Finland Oy, Innovatics Oy, and Inderes Oy as service

providers to carry out the tasks described in this privacy statement, which include the processing of personal data. In addition, other service providers can be used if necessary. These service providers act as data processors on behalf of and for Solwers. Euroclear Finland Oy uses external service providers for the maintenance of its systems, which may operate outside the EU or the European Economic Area. The security and fairness of the processing of personal data is ensured by contracts that take into account the applicable European Commission model contract clauses under the Data Protection Regulation and by other appropriate and lawful safeguards. Data is not disclosed for commercial purposes.

For recipients with Finnish phone numbers, text messages are sent via a Finnish service provider. For those with foreign numbers, text messages are sent using a Swiss service.

Additionally, Solwers may disclose personal data to competent authorities when required by law, to prepare for legal proceedings, or to defend against a legal claim within the limits set by applicable legislation or as mandated by law. If Solwers reorganises its business, personal data may be disclosed to prospective buyers or their representatives in compliance with applicable legislation.

If it's possible to use the right to speak virtually in the General Meeting, the right to speak will be enabled by a US service provider¹. In this case, the aforementioned service provider processes the IP address and name of the person using the right to speak. Otherwise, personal data is not transferred or disclosed outside the EU or the European Economic Area.

If personal data is transferred outside the EU or the European Economic Area, Solwers ensures an adequate level of data protection. Additional information about the transfer or disclosure of personal data outside the EU or EEA, as well as the applicable transfer grounds, can be obtained from the contact person mentioned in section 1.

7. Basis for protection

Physical material is stored in a locked room accessible only to persons entitled to the data.

Electronic material is stored in a data room that meets the requirements for the processing of personal data. The connection from the user's browser to the server is encrypted. Access to personal data is limited to the employees of the controller and subcontractors who need and process data to organise the General Meeting.

8. Storage and deletion of personal data

Innovatics Oy stores personal data for a maximum of two years after the end of the General Meeting.

Euroclear Finland Oy stores personal data for a maximum of four months after the end of the General Meeting.

The minutes of the General Meeting and the list of votes attached thereto are stored permanently. It includes the names of shareholders who participated in the

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

General Meeting, the names of potential proxies and aids, the grounds for representation, the number of shares and votes, and the numbers of the voting tickets.

Other data is destroyed when it is no longer necessary to draw up the minutes or to verify their accuracy.

9. Rights of the data subject

The data subject may use the rights related to the processing of their personal data specified below with regard to Solwers. The exercise of the rights is a personal right of the data subject and requires verification of the data subject's identity.

- **Right of access:** The data subject has the right to get a confirmation from Solwers on whether Solwers processes personal data concerning the data subject, as well as the right to access such data. Solwers may request the data subject to specify their request, amongst others, with regard to the details of the data to be delivered.
- **Right to rectification:** The data subject has the right to request Solwers rectify inaccurate and incorrect data concerning them, and to have incomplete personal data to be completed.
- **Right to be forgotten:** The data subject has the right to request Solwers erase personal data related to them. Solwers has the obligation to erase such data if there is no longer a legal ground for processing such data and the legal obligation binding Solwers related to the storing of the personal data has terminated.
- **Right to restriction of processing:** In certain cases prescribed by law, the data subject may have the right to have Solwers restrict the processing of their personal data.
- **Right to object to processing of personal data:** In certain cases, the data subject may have the right to object to the processing of their personal data. The right to object is applicable to such situations in particular where the processing of personal data is based on the controller's legitimate interest. In such situations, Solwers has to comply with the data subject's request, unless Solwers demonstrates compelling legitimate grounds for the processing that override the interests, rights and freedoms of the controller or the personal data is needed for the establishment, exercise or defence of legal claims.

Any request shall be addressed in writing to the contact person mentioned in Section 1 above.

The data subject has the right to lodge a complaint with the Data Protection Ombudsman if they have objections to the processing of personal data. The instructions are found on the website of the Data Protection Ombudsman at <https://tietosuoja.fi/>.