

# Privacy Statement

## Musti Group Plc's Annual General Meeting 2025

This privacy statement for the 2025 Annual General Meeting of Musti Group Plc (the "Privacy Statement") describes how personal data is processed in relation to the 2025 Annual General Meeting of Musti Group Plc ("Musti Group").

Personal data is processed in accordance with the EU General Data Protection Regulation (Regulation (EU) 2016/679, as amended), the Finnish Data Protection Act (1050/2018, as amended) and other applicable data protection legislation.

## 1. Data controller and contact information

Musti Group Plc, business ID: 2659161-1 Mäkitorpantie 3 B, 00620 Helsinki, Finland

Contact person: Hannu Harjula privacy@mustigroup.com

## 2. The purpose and legal basis for processing personal data

The purpose of processing personal data is to enable the data controller to organize and conduct the General Meeting in accordance with the law.

Personal data is processed only for the purposes necessary for the organization of the General Meeting, such as to verify the identity of the registrant and their right to participate, prepare a list of participants, a list of votes, possible ballots and the minutes of the General Meeting, organize any voting, and manage possible questions and requests to address the meeting. The processing of personal data described in this Privacy Statement is based on Musti Group's legal obligations related to the organization of the General Meeting, in particular the obligations under the Finnish Companies Act (624/2006, as amended), as well as other legal obligations under applicable legislation, such as the Securities Market Act (756/2012, as amended).

The technical implementation of the registration system and advance voting as well as possible voting during the General Meeting and General Meeting bookkeeping is carried out by Innovatics Oy. The shareholders' register is maintained by Euroclear Finland Oy. Inderes Oyj shall provide the technical implementation of the General Meeting.

# 3. Processed personal data

Personal data is processed only to the extent necessary for the purposes set out above.

The processed personal data include the shareholder's and their possible proxy representative's name, personal identity 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 legal adviser, power of attorney, preliminary questions, 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 also recorded. For technical maintenance and monitoring of General Meeting service, log data on registration and voting, as well as the user's IP address are recorded.

The register contains a shareholders' register of the record date created by Euroclear Finland Oy for the General Meeting, containing, e.g. the shareholder's name, personal identity number / business ID, address, and number of shares.

The register contains a temporary shareholders' register of the record date created by Euroclear Finland Oy for the General Meeting, containing, e.g. name, personal identity number / business ID, address, and number of shares of a nominee-registered shareholder registered for the General Meeting.

The processing of personal data does not involve automated decision-making.

# 4. Regular sources of data

Personal data is mainly collected from the shareholder themselves or from their representatives in connection with the registration for the General Meeting. When registering via e-mail or regular mail, the data controller or Innovatics Oy enters the registrant's personal data and possible advance votes into the register.

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 from the shareholders' register created by Euroclear Finland.

Innovatics Oy enters the voting instructions of nominee-registered shareholders represented by custodians at the General Meeting into the register.

#### 5. Disclosures and transfers of personal data

Based on the information in the register, a list of votes and a summary of the votes cast are established and attached to the minutes of the General Meeting. The list of votes contains the name of the shareholder and possible proxy representative and/or assistant, the ballot number (participant number), number of shares by share class, number of votes, basis of representation and means of attendance.

Personal data may be disclosed to the participants of the Annual General Meeting, as well as to other shareholders and third parties in accordance with applicable law. At the General Meeting, a shareholders' register is available in accordance with the Finnish Companies Act, which includes the names of shareholders, their municipality and the number of shares and votes according to the record date of the General Meeting. The list also contains information on nominee-registered shareholders who are temporarily registered in the shareholders' register for the General Meeting.



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

In principle, personal data is not disclosed to third parties. However, Musti Group may disclose personal data to its group companies or if Musti Group is required to do so on the basis of a legal obligation or an order of an authority. In addition, the data contained in the register may be shared with third parties involved in organizing the General Meeting who need the personal data in their operations. Such third parties include the technical implementers of the General Meeting (Innovatics Oy and Inderes Oyj) as well as the maintainer of the shareholders' register (Euroclear Finland Oy). Data is not disclosed for commercial purposes.

In principle, personal data is not transferred or disclosed outside the EU or the European Economic Area ("EEA"). However, if personal data is transferred outside the EU or EEA, for example in situations where a third-party service provider or its parent company is located outside the EU or EEA, transfers are subject to the conditions set out in data protection legislation, such as the European Commission's model contractual clauses, Commission adequacy decisions or other transfer mechanisms specified in the GDPR.

#### 7. Basis for register 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 the register is limited to the employees of the controller and subcontractors who need and process data to organize the General Meeting.

# 8. Storage and deletion of personal data

The personal data will be stored until the purposes set out in this Privacy Statement have been fulfilled or as long as required under applicable legislation.

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.

Inderes Oyj stores personal data for a maximum of two years after the end of the General Meeting.

The minutes of the General Meeting and the list of votes attached thereto are stored permanently. The minutes of the General Meeting include the names of shareholders who participated in the General Meeting, the names of possible proxy representatives and assistants, the number of shares and votes, and the ballot numbers. Other data is destroyed when such data is no longer necessary to draw up the minutes or to verify their accuracy.

Appropriate technical and organizational measures are implemented to protect the personal data from loss, misuse, unauthorized access, disclosure, alteration and destruction.



## 9. Rights of the data subject

Data subjects have the right to obtain information on the processing of personal data and to have access to their personal data. Data subjects have the right to request the rectification of their data as well as the right the right to request restriction of processing within the limits of and in accordance with applicable data protection legislation. Any requests shall be addressed in writing to the contact person mentioned in Section 1 above.

Data subjects have the right to lodge a complaint with the competent supervisory authority if they have objections to the processing of personal data. In Finland, the supervisory authority is the Data Protection Ombudsman and the instructions for lodging a complaint can be found on the website of the Data Protection Ombudsman at <u>https://tietosuoja.fi/en/home</u>.

#### 10. Changes

This Privacy Statement may be updated, for example, if required by changes in applicable legislation. Depending on the significance of the update, Musti Group will provide notification about the updates by email or other means it deems appropriate.