

Privacy Policy

This Privacy Policy describes the processing of personal data related to Lamor Corporation Plc's Annual General Meeting.

Updated 13 March 2023.

1. Data controller and contact person

Lamor Corporation Plc
Business ID: 2038517-1
Address: Rihkamatori 2, 06100 Porvoo, Finland

Contact person named by the data controller:
Elina Keihänen
Tel: +358 20 765 0100
Email: ir@lamor.com

2. Name of the register

Lamor Corporation Plc's Annual General Meeting register.

3. The purpose and legal basis for the processing of personal data

The purpose of the processing of personal data is to enable the conduct of the controller's Annual General Meeting in compliance with the applicable law.

Personal data will be processed only for the purposes necessary for organizing the Annual General Meeting, such as verifying the identity of the registrant and the right to participate, drawing up the meeting's list of participants, the list of votes and ballots, organising the voting and managing questions asked in writing and requests to speak at the meeting.

Innovatics Ltd is responsible for the technical implementation of the registration, meeting attendance recording and voting of the Annual General Meeting. The list of shareholders is maintained by Euroclear Finland Oy.

The processing of personal data is based on the controller's legal obligations.

4. Personal data processed

The personal data processed includes the shareholder's or his representative's name, personal identity code and/or business ID, address, contact information, number of shares and votes, voting records, method of identification, basis of representation, date of registration, any information on a proxy and power of attorney, advance questions and any other additional information given during the registration. In addition, the time of arrival and time of departure from the meeting will be recorded for those attending the meeting. For technical maintenance and monitoring of the service, log data of registration, oral or written questions, and voting, as well as the user's IP address are also stored.

The register contains a list of shareholders on the record date, compiled by Euroclear Finland. The list includes, for example, each shareholder's name, personal identity code or business ID, address and the number of shares held.

The register also contains a temporary list of shareholders, compiled by Euroclear Finland. The list includes information on the holders of nominee-registered shares who have registered for the Annual General Meeting and the number of shares held by them.

5. Regular sources of information

As a rule, personal data is collected from the person himself or herself or from his or her representative when registering for the Annual General Meeting. When registering by e-mail, mail or telephone, the controller or Innovatics Ltd enters the personal data and advance votes of the registrant to the register.

On the basis of the personal data provided in connection with the registration, Innovatics Ltd shall search the number of shareholder's shares from the list of shareholders on the record date of the Annual General Meeting formed by Euroclear Finland Oy.

Innovatics Ltd shall enter the voting instructions of the holders of nominee-registered shares represented in the Annual General Meeting by account management organisations to the register.

6. Disclosures of the personal data

A list of participants of the Annual General Meeting and the summaries of the voting shall be formed on the basis of the information in the register. This list and summary shall be attached to the minutes of the Annual General Meeting.

In accordance with the Finnish Companies Act, the shareholders' register, containing shareholders' names, municipalities and the numbers of shares and votes in accordance with the record date of the Annual General Meeting, shall be available in the Annual General Meeting. The register will also contain the information of shares of holders of nominee-registered shares who have temporarily registered into the shareholders' register for the Annual General Meeting.

7. Disclosure of data to third parties and outside the EU or the European Economic Area

Information may be disclosed to those third parties who will participate in arranging the Annual General Meeting and who need the information for that purpose. The data is not disclosed for commercial purposes.

Text messages to registrants are sent via a Swiss service.

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 no information is transferred outside the EU or the European Economic Area.

8. Principles of the protection of the register

Non-digital data is kept in a locked space and is available only for authorised persons.

Digital data is stored in a data center that meets the requirements set for processing personal data. Data connection between the user's browser and the server is encrypted. Access to the data is limited to those employees of the data controller and its subcontractors who need and process the information for arranging the Annual General Meeting.

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/>

9. Retention and erasure of personal data

Innovatics Ltd shall store the personal data for up to one year after the end of the Annual General Meeting.

Euroclear Finland Oy shall store the personal data for up to four months after the end of the General Meeting.

The General Meeting's minutes and the list of votes appended to the minutes shall be retained permanently. They contain the names of the shareholders who participated in the General Meeting along with the names of any proxies and assistants, their number of shares and votes and their ballot numbers.

Other data shall be erased when it is no longer necessary for the purpose of drawing up the minutes of the meeting or verifying the accuracy of the information contained therein.

10. Data subject's rights

Data subjects have the right to be informed of what data has been recorded in the register concerning them. Data subjects have the right to request the rectification, erasure, restriction or supplementation of their personal data. Any requests shall be addressed in writing to the contact person referred to in paragraph 1 above.

Data subjects have the right to lodge a complaint with the Data Protection Ombudsman if they have any grievances pertaining to the processing of data. Instructions for this can be found on the Data Protection Ombudsman's website at <https://tietosuoja.fi/en/home>.