

PRIVACY POLICY - THE RECIPIENTS OF INVESTOR RELEASES

1 GENERAL

The purpose of this Privacy Policy is to provide the information required by the EU General Data Protection Regulation 2016/679 on how PHM Group collects, stores and otherwise processes personal data of the recipients of PHM Group's stock exchange and press releases.

2 DATA CONTROLLER AND CONTACT DETAILS

In accordance with this Privacy Policy, the data controller is PHM Group Holding Oy (Business ID: 3123811-8), hereinafter "PHM Group" or "we".

The contact person of the data controller is Hanna Montonen.

Address: c/o PHM Group Services Oy (3125932-2), Takomotie 1-3, 00380 Helsinki

Email: hanna.montonen@phmgroup.com

3 PURPOSES AND LEGAL BASES FOR PROCESSING PERSONAL DATA AND CATEGORIES OF PERSONAL DATA PROCESSED

Depending on your relationship with us, we may send you investor releases either as part of our investor relations activities or when you have subscribed to receive our investor releases. The main purpose for processing personal data is the provision of investor releases.

We can only process personal data on legal basis defined in data protection legislation. The legal bases for processing are the legitimate interest of PHM Group or the consent of the data subject.

The table below defines purpose and legal bases for processing and categories of personal data processed in more detail.

| Purpose for processing | Legal basis | Categories of personal data |
|------------------------|--|--|
| Investor relations | Legitimate interests of the controller | <ul style="list-style-type: none">• Forename and surname;• information that the person is our investor or represents our investor; and• email address. |
| Independent recipients | Consent of the data subject | <ul style="list-style-type: none">• Forename and surname; and• email address. |

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| <p>Using other than strictly necessary cookies and other tracking technologies to:</p> <ul style="list-style-type: none"> • Provide and develop investor release | <p>Consent of the data subject (other than strictly necessary cookies)</p> <p>Legitimate interests of the controller (processing of data used for analytics)</p> | <ul style="list-style-type: none"> • Monitoring the provision of investor releases; and • investor release opening rates. |
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4 SOURCES AND UPDATING OF PERSONAL DATA

Personal data on investors is collected from investors themselves or through an entity represented by the investor. Independent recipients submit personal data to us when signing up to our investor release. The above listed personal data is strictly necessary in order to provide the investor releases.

5 RECIPIENTS OF PERSONAL DATA

We may disclose your personal data to the extent permitted and obligated by existing legislation, including in connection with business transactions, and with selected partners to provide a service, unless you object the disclosure of your personal data.

We may use the following service providers in processing your personal data:

- Oy Suomen Tietotoimisto – Finska Notisbyrån Ab ("STT"))
- Google
- Hotjar

In addition, data can be transferred to other service providers through cookies. Please see our Cookies Policy for more information: <https://phmgroup.com/cookie-policy/>

We enter into a data processing agreement with every service provider who processes personal data on our behalf. In accordance with the data protection agreement, each service provider processes personal data only to the extent necessary for the provision of that service.

If PHM Group is involved in a corporate transaction, personal data may be disclosed to third parties in relation to such transaction in accordance with the applicable data protection laws.

6 PERSONAL DATA TRANSFERS OUTSIDE THE EU/EEA

In principle, we do not transfer personal data outside the European Union or European Economic Area. However, we use cookies that may transfer data outside the European

Union or European Economic Area. Please see our Cookies Policy for more information: <https://phmgroup.com/cookie-policy/>

7 **PERSONAL DATA RETENTION AND SECURITY OF PROCESSING**

Personal data is stored in information system in which the necessary and appropriate technical and organisational measures have been taken to ensure the security of processing and to monitor the use of personal data. Access to data is limited to persons for whom it is necessary, in order to fulfil their duties, and only to the extent necessary to the performance of those duties.

Processing does not include automated decision making.

The personal data of the investor release recipients will be retained until the investor's representative changes, the recipient objects to the processing of his/her personal data or withdraws the consent.

8 **RIGHTS OF THE DATA SUBJECT**

You can always withdraw your investor release subscription via the link in the investor release. In addition, if you wish to exercise any other rights of data subject, you may contact us informally at the address mentioned in section 2.

As a data subject you have the following rights:

| Rights of the data subject | |
|---|--|
| Right of access | You have the right to receive information from us whether or not we are processing your personal data and what personal data is being processed. |
| Right to rectification | You have the right to request that inaccurate or incomplete personal data relating to you be rectified or completed. |
| Right to erasure | You may have the right to request the erasure of your personal data in certain cases. |
| Right to restriction of processing | You may request the restriction of the processing of your personal data in certain cases. |
| Right to object | You may have the right to object to the processing of your personal data in certain cases. |

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| | If your personal data is processed for direct marketing, you always have the right to object to the processing of your personal data. |
| Right to data portability | To the extent that we process your personal data on the basis of your consent or a contract and the processing is carried out by automated means, you have the right to obtain the personal data relating to yourself that you have provided to us in a structured, commonly used and machine-readable form, and the right to transmit this data to another controller. |
| Right to withdraw consent | You have the right at any time to withdraw your consent to the processing of personal data. Withdrawal of consent has no effect on the lawfulness of processing carried out prior to withdrawal. |
| Right to lodge a complaint with a supervisory authority | You have the right to lodge a complaint with the competent supervisory authority, if you consider that your personal data has been processed in violation of applicable data protection laws. In Finland, the supervisory authority is the Office of the Data Protection Ombudsman. |

In order to have more detailed information of the above mention rights, please see the website of the Office of the Data Protection Ombudsman through the following link: <https://tietosuoja.fi/en/what-rights-do-data-subjects-have-in-different-situations>.