

Harvia Plc Data Protection Notice – Annual General Meeting

This Data Protection Notice describes the processing of personal data related to Harvia Plc's General Meeting.

1. Controller and contact information

Register Controller:

Harvia Plc (“Harvia”)
P.O. Box 12
(Teollisuustie 1–7)
FI-40951 Muurame
Business ID: 2612169-5

Contact Person:

Ari Vesterinen
CFO
+358 405 050 440
ari.vesterinen@harvia.com

2. Name of the register

Harvia Plc's register of general meetings

3. 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.

4. Processed personal data

The processed personal data include the shareholder's and their possible proxy'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 aid, 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 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 register contains the list of shareholders on the record date created by Euroclear Finland 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 list of shareholders created by Euroclear Finland for the General Meeting, containing information on nominee registered shareholders registered for the General Meeting and their number of shares.

5. Regular sources of data

Personal data is mainly collected from the shareholder themselves or from their representative in connection with the registration to the General Meeting. When registering via e-mail, mail or telephone, the controller or Innovatics Oy enters the registrant's personal data and 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 list of shareholders created by Euroclear Finland.

Innovatics Oy enters the voting instructions for nominee registered shareholders represented by account operators at the General Meeting into the register.

6. 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 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.

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

The data contained in the register may be shared with third parties involved in organising the General Meeting who need the registered data in their operations. 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.

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.

8. 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 organise the General Meeting.

9. 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 General Meeting, the names of potential proxies and aids, 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.

10. Rights of the data subject

The data subject may use the rights related to the processing of his/her personal data specified below with regard to Harvia. The exercise of the rights is a personal right of the data subject and requires identification.

- Right of access: The data subject has the right to obtain a confirmation from Harvia on whether Harvia processes personal data concerning the data subject, as well as the right to access such data. Harvia may request the data subject to specify his/her request, amongst others, with regard to the details of the data to be delivered.
- Right to rectification: The data subject has the right to obtain from Harvia the rectification of inaccurate personal data concerning him/her processed by Harvia, and to have incomplete personal data processed by Harvia to be completed.

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/>

- Right to be forgotten: The data subject has the right to obtain from Harvia the erasure of personal data related to him/her. Harvia has the obligation to erase such data in case there is no longer a legal ground for the processing of such data and the legal obligation binding Harvia related to the storing of the personal data has terminated.
- Restriction of processing: In certain cases prescribed by law, the data subject has the right to obtain from Harvia restriction of processing of his/her personal data.
- Right to object to processing of personal data: In certain cases, the data subject may have the right to object to processing of his/her personal data. The right to object is applicable in such situations in particular where the processing of personal data is based on the controller's legitimate interest. In such situations, Harvia has to comply with the data subject's request, unless Harvia demonstrates compelling legitimate grounds for the processing, which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

The requests shall be directed 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/>