

Privacy Statement

This Privacy Statement describes the processing of personal data related to the Annual General Meeting of Digital Workforce Services Plc.

Updated 3/16/2023

1. Registrar and contact details

Name: Digital Workforce Services Corporation
Address: Mechelininkatu 1, 00180 Helsinki
Business ID: 2704792-5
Name of the person: Karri Lehtonen
Contact information: karri.lehtonen@digitalworkforce.com

2. Name of the registry

Register of Digital Workforce Services Plc's Annual General Meeting.

3. Purpose and legal grounds for the processing of personal data

The purpose of the processing of personal data is to enable the general meeting of the registrar to be conducted in accordance with the law.

Personal data will only be processed for purposes necessary for the organization of the general meeting, such as verifying the identity of the registrant and verifying eligibility, compiling the list of participants, voting list and ballot papers, organizing voting and managing preliminary questions and requests to speak.

Innovatics Oy is the technical implementer of the registration system and advance voting for the Annual General Meeting. The shareholder list is maintained by Euroclear Finland Oy.

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

4. Personal data to be processed

The personal data processed includes the name, personal identity number and / or business ID of the shareholder and his / her potential representative, address, contact information, number of shares and votes, voting information, method of identification, basis of representation, date of registration, and any additional information about the assistant, power of attorney, preliminary questions . In addition, the time of arrival and departure of the meeting will be recorded. In addition, log information on registration and voting and the user's IP address are stored for the technical maintenance and monitoring of the service.

The register contains the list of shareholders on the record date compiled by Euroclear Finland for the Annual General Meeting, which contains e.g. the shareholder's name, personal identification number, address and number of shares.

The register contains a temporary list of shareholders compiled by Euroclear Finland for the Annual General Meeting, which contains information on nominee-registered shareholders registered for the Annual General Meeting and their number of shares.

5. Regular sources of information

As a rule, personal data is collected from the person himself or herself or his or her representative when registering for the Annual General Meeting. When registering via e-mail, post or telephone, the registrar or Innovatics Oy enters the registrant's personal data and advance votes into the register.

Based on the personal information provided in connection with the registration, Innovatics Oy retrieves the number of shares from the shareholder list compiled by Euroclear Finland Oy on the record date of the meeting.

Innovatics Oy enters the voting instructions of the nominee-registered shareholders represented by the account operators at the Annual General Meeting.

6. Disclosure of personal data

On the basis of the information in the register, a list of participants and voting summaries will be drawn up and attached to the minutes of the meeting.

In accordance with the Companies Act, a list of shareholders is kept at the Annual General Meeting, which includes the name of the shareholders, the municipality and the number of shares and votes in accordance with the record date of the meeting. The list also contains the information of nominee-registered shareholders who have temporarily registered for the shareholders' list for the Annual General Meeting.

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

The information in the register may be shared with those third parties who participate in the organization of the general meeting and need the information in the register in their own activities. The information will not be disclosed for commercial purposes.

Text messages to registrants will be sent via the Swiss service. Otherwise, personal data will not be transferred or transferred outside the EU or the European Economic Area.

8. Registry Security Basics

Physical material is stored in a locked room that can only be accessed by authorized persons.

Electronic material is stored in a data center that meets the requirements for the processing of personal data. The communication connection from the user's browser to the server is encrypted. Access to the register is limited to a limited number of employees of the registrar and subcontractors who need and process the information in order to hold a general meeting.

9. Retention and deletion of personal data

Innovatics Oy retains personal data for a maximum of one year after the end of the Annual General Meeting.

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

The minutes of the Annual General Meeting and the attached list of votes are kept permanently. It includes the names of the shareholders who attended the Annual General Meeting, the names of any proxies and assistants, the number of shares and votes, and the numbers of the ballots.

Other information shall be destroyed when it is no longer necessary for the drawing up of the report or for verifying its accuracy.

10. Rights of the data subject

The data subject has the right to know the data stored about him in the register. The data subject has the right to request the correction, deletion or supplementation of his data. Any requests shall be addressed in writing to the contact person mentioned in point 1 above.

The data subject has the right to lodge a complaint with the Data Protection Officer if he or she has any remarks in connection with the processing. Instructions for this can be found on the Data Protection Commission's website at <https://tietosuoja.fi/>