

## PRIVACY STATEMENT

**Updated: May 2018**

<p><b>1. Controller</b></p>	<p>Name: Euroclear Finland Oy ("Euroclear Finland")</p> <hr/> <p>Contact information: Postal address: PO Box 1110, FI-00101 HELSINKI Street address: Urho Kekkosen katu 5 C, 00100 HELSINKI Telephone: +358 20 770 6000 (exchange)</p>
<p><b>2. Data protection officer</b></p>	<p>Name:</p> <hr/> <p>Contact information: Telephone: +358 20 770 6000 (exchange) Email: DPO.Finland@euroclear.eu</p>
<p><b>3. Name of the register</b></p>	<p>Book-entry register</p>
<p><b>4. Purpose and legal basis for processing of personal data</b></p>	<p>The keeping of a register is provided for in Chapter 1, Section 3(4) of the Act on the Book-Entry System and Clearing Operations (348/2017).</p> <p>According to Chapter 1, Section 3(4) of the Act on the Book-Entry System and Clearing Operations, a register must be kept of book-entry accounts, the book-entries registered in the book-entry accounts, and the rights and obligations pertaining to book-entry accounts in the Finnish central securities depository. Euroclear Finland Oy has been granted a licence to carry out the tasks of a central securities depository as referred to in the said Act.</p> <p>Tata Consultancy Services Limited, Capgemini Finland Oy and Tieto Finland Oy participate in the development and technical maintenance of the book-entry system.</p>
<p><b>5. Information content of the register</b></p>	<p>The book-entry accounts and lists of the owners of book-entries registered in the accounts form a registered book-entry system.</p> <p>The following information must be entered on a book-entry account:</p> <ol style="list-style-type: none"> <li>1. The account holder, guardian or other holders of rights pertaining to the book-entries registered in the account (name, personal identity code/Business ID or equivalent personal code, date of birth, language,</li> </ol>

	<p>nationality, address, bank account number, country of taxation, municipality of taxation);</p> <ol style="list-style-type: none"> <li>2. the number and type of book-entries registered in the account; and</li> <li>3. the rights and obligations pertaining to the account and the book-entries registered in the account.</li> </ol> <p>The personal data related to the book-entry register are kept indefinitely.</p>
<p><b>6. Regular data sources</b></p>	<p>The personal data is collected in accordance with the Act on the Book-Entry System and Clearing Operations and originate from the account operators, the book-entry system and authorities.</p>
<p><b>7. Regular disclosure of data</b></p>	<p>Owner data generated from the centralised book-entry register are disclosed as follows:</p> <p>According to Chapter 3, Section 17(1) of the Limited Liability Companies Act (624/2006) and Chapter 4, Section 16(1) the Cooperatives Act (421/2013), the list of owners of a company or cooperative incorporated in the book-entry system (the list of shareholders of a limited liability company or the list of members and owners of a co-operative) can be made available to the public at the office of the central securities depository in Finland. Upon paying the costs, anyone has the right to obtain a copy of the shareholder list or part thereof in accordance with the Limited Liability Companies Act and the Cooperatives Act.</p> <p>The following information can be viewed of every owner of a limited liability company on the public access terminal located at Euroclear Finland's customer service data terminal:</p> <ul style="list-style-type: none"> <li>- name and address or home municipality of the owner</li> <li>- date of birth</li> <li>- nationality</li> <li>- details on ownership</li> <li>- number of waiting lists and reason for being on a waiting list</li> <li>- information on any joint owners</li> </ul> <p>The equivalent information can be viewed of every member of a cooperative on the customer terminal located at Euroclear Finland's customer service data terminal.</p> <p>Euroclear Finland may disclose the data of the lists of ownership for direct marketing purposes or for marketing surveys and opinion polls, unless such disclosure has been forbidden by the data subject.</p> <p>A company may order the following information, which is more extensive than public information, on the owners of its own company:</p> <ul style="list-style-type: none"> <li>- owner's name, address, identifying code, language, nationality, sector and any customer restriction</li> </ul>

	<ul style="list-style-type: none"> <li>- details on ownership</li> <li>- number of waiting lists and reason for being on a waiting list</li> <li>- information on any joint owners</li> <li>- information on the account operator</li> </ul> <p>The effect of non-disclosure for personal safety reasons on the disclosure of data included in the list of shareholders:</p> <p>According to Chapter 3, Section 17(4) of the Limited Liability Companies Act (624/2006), if a Local Register Office has ordered a restriction on the disclosure of information concerning a shareholder on the basis of <u>Section 36 of the Population Information Act (661/2009)</u> (<b>non-disclosure for personal safety reasons</b>) and the company has been informed of the restriction, the home municipality, address or other contact information of the shareholder entered in the shareholder list may only be disclosed to the authorities. The contact address entered for such a shareholder in the shareholder list may also be disclosed to parties other than authorities.</p> <p>In order to enforce non-disclosure for personal safety reasons, a person (the data subject) must inform his or her account operator or the issuer (company) of the non-disclosure order and a contact address. The account operator or the issuer will report this to Euroclear Finland, who will record it in the lists of owners.</p> <p>With regard to shares, share depositary receipts, pre-emption rights, options, warranties and bonds issued in the book-entry system and cooperative shares, Euroclear Finland will report the information necessary for taxation to the Tax Administration on book-entries incorporated in the book-entry systems, as well as their owners and yield recipients. Reported information includes, among other items, the owner's name and personal identity code, the name and type of security, the number of book-entries and the ISIN code of the book-entry. No data will be reported on bonds that are subject to taxation on interest at source.</p>
<p><b>8. Processing of personal data outside the EU or EEA</b></p>	<p>The processing of personal data outside the European Union or the European Economic Area in India by Capgemini India Private Limited and Tata Consultancy Services is based on an agreement between the controller and processor which take into account the standard contractual clauses referred to in the General Data Protection Regulation approved by the European Commission.</p>
<p><b>9. Register protection principles</b></p>	<p>With regard to register protection principles, it can be stated on a general level that the Act on the Book-Entry System and Clearing Operations (Chapter 8, Section 1) stipulates a special confidentiality obligation applicable to, among others, account operators, their agents and Euroclear Finland's staff.</p> <p><u>A. Manual material</u></p> <p>With the exception of official data, there is no manual material, as the account operators act as the keepers of the data. Official data is stored in fireproof facilities.</p>

	<p><b><u>B. Data processed in digital form</u></b></p> <p>The book-entry system and other related systems are protected using high-quality technical protection.</p> <p>Authorisation to make entries in the book-entry register is only granted to persons who meet the requirements set forth in Euroclear Finland’s rules and who have user credentials enabling access to the systems. The account operator must designate at least one person from among its employees to represent the account operator in relation to Euroclear Finland in communications related to registration activities, and to grant authorisation to use the system. Euroclear Finland will provide the designated person with the right to grant user authorisation for the purpose of registering entries in the account operator’s own book-entry register.</p> <p>Security aspects pertaining to the register are provided for in more detail in the Act on Book-Entry Accounts and Euroclear Finland’s rules.</p>
<p><b>10. Data subjects’ rights</b></p>	<p>According to the General Data Protection Regulation, data subjects have the following rights regarding their personal data:</p> <ul style="list-style-type: none"> <li>• Right of access to their personal data</li> <li>• Right to request the controller to rectify incomplete or incorrect personal data</li> <li>• Right to object to or restrict the processing of personal data and to object to automated decision-making</li> <li>• Right to request the controller to erase personal data</li> <li>• Right to transfer personal data to another controller</li> </ul> <p>If the data subject wishes to exercise his or her rights, he or she should contact the Data Protection Officer of Euroclear Finland specified above. If the data subject has given his or her consent for processing and, in the absence of any other legal basis, the data subject is entitled to withdraw consent by contacting the above-mentioned Data Protection Officer of Euroclear Finland. If the data subject believes that his or her personal data are not being processed in accordance with the General Data Protection Regulation, the data subject has the right to file a complaint to a supervisory authority.</p>