

## **PRIVACY NOTICE**

18 March 2021

#### BACKGROUND

The purpose of this privacy notice is to describe how Avidly Plc collects, processes and shares personal data of its shareholders and their representatives and proxy representatives in connection with its annual general meeting. Avidly Plc, 2018481-2 (the "Company") is the data controller in relation to the processing of your personal data.

### FROM WHERE DO WE COLLECT YOUR PERSONAL DATA

We may collect your personal data from you when you register for the annual general meeting and vote in advance. We may also collect your personal data from Euroclear Finland Oy which maintains the Company's shareholder register. Personal data may also be collected or generated automatically when you use our website and register to the annual general meeting.

You cannot register to the annual general meeting unless you provide the necessary personal data for us to ensure your voting right and right to attend the meeting.

The register contains the shareholders' register of the record date created for the general meeting by Euroclear Finland Oy. The shareholder's register contains i.a. the name, birthdate or business identification number, address details and the number of shares of the shareholder. The register contains a temporary shareholders' register created by Euroclear Finland Oy for the general meeting. The shareholders' register contains information of the shareholders that are nominee registered and have registered to the annual general meeting. The personal data that shall be collected is listed in more detail below in section "Categories of Personal Data".



### CATEGORIES OF PERSONAL DATA

We may collect and process the following categories of shareholders' personal data:

- Name;
- Date of birth or business ID;
- Address;
- Book-entry account number;
- Number of shares;
- Information concerning registration and participation in the annual general meeting, e.g. representative of a shareholder, power of attorneys and voting data; and
- Data logs from registration and voting and.

Personal data is retained for only as long as is necessary for the purposes for which they were collected.

# WHY WE PROCESS YOUR PERSONAL DATA AND LEGAL BASIS FOR PROCESSING

We process your personal data for the purpose of organizing the Company's annual general meeting as required pursuant to the Finnish Limited Liability Companies Act (624/2006), including the registration, verification of the identity of shareholders and their right to participate as well as to carry out other meeting arrangements.

The legal basis for processing the personal data is the data controller's legal obligation to hold an annual general meeting in accordance with the Finnish Limited Liability Companies Act (624/2006) and act on the temporary amendment to the Finnish Limited Liability Companies Act (677/2020) as well as the data controller's legitimate interest to ensure the appropriate management of the Company.

### RECIPIENTS THAT WE SHARE YOUR PERSONAL DATA WITH

Where necessary, we share your personal data with our service providers that assist us in organizing and carrying out the annual general meeting, mainly Euroclear Finland Oy, which takes care of the technical implementation of the collection of personal data on our behalf.



### WHERE WE PROCESS PERSONAL DATA

We process your personal data within the European Union/European Economic Area. Personal data is not transferred outside the European Union/European Economic Area.

### YOUR RIGHTS

Under data protection regulations you have certain rights in relation to the processing of your personal data. We process your personal data to the extent necessary in order to fulfill your rights. Please submit any requests by contacting us at the address stated below. You have the right to:

- Access your personal data: You have the right to access personal data we process about you. We will provide you with it unless we have lawful reasons not to share this data or if sharing the data would adversely affect the rights and freedoms of others.
- Update your personal data: Furthermore, you have the right to request that incorrect or incomplete personal data is corrected or completed.
- Withdraw consent: To the extent we rely on your consent to process personal data you
  have the right to at any time withdraw your consent.
- Object to the processing of personal data: You have the right to object to the processing of your personal data based on a legitimate interest for reasons which concerns your particular situation. In such a situation, we will stop using your personal data where the processing is based on a legitimate interest, unless we can show that the interest overrides your privacy interest or that the use of your personal data is necessary in order to manage or defend legal claims.
- Delete your personal data: Under certain circumstances you have the right to request that your personal data is deleted. However, we cannot delete your personal data if we for example are obligated under law to keep the data.
- Restrict the use of your personal data: You have the right under certain circumstances to request that the processing of your personal data is restricted. If the processing of your personal data has been restricted we may only, besides storing the data, process your personal data with your consent, in order to establish, exercise or defend legal claims or to defend rights of others.
- Transfer your personal data (data portability): Finally, you have the right to request a



copy of the personal data that we store about you in a structured, commonly used and machine-readable format (data portability). The right to data portability, compared to the right to access, only comprises such personal data you yourself have provided and which we process based on certain legal grounds, e.g. your consent.

### CONTACT

If you have any questions regarding the processing of your personal data, please do not hesitate to contact us. See below for contact details. If you are not satisfied with our response, you have the right to lodge a complaint with the supervisory authority, which in Finland is the Office of the Data Protection Ombudsman. Please see the contact details here.

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