

Privacy Notice for the Shareholders and Shareholders'

Last updated: 14 March 2024

1 Controller

Ponsse Oyj (0934209-0)
Ponssentie 22
tel. 020 768 800
(hereafter "we")

2 Contact Person for Register Matters

Name: Tanja Karppinen
Address: Ponssentie 22, 74200, Vieremä
Phone number: +358 20 768 800 (center)
Email address: tanja.karppinen@ponsse.com

3 Legal Basis and Purpose of the Processing of Personal Data

The purpose of the processing is based on the law (Limited Liability Companies Act) and our legitimate interest. Chapter 3 Section 15 of the Limited Liability Companies Act requires a share register to be maintained. In addition, the purpose of processing personal data is to ensure the rights of the shareholders under the Limited Liability Companies Act, including payment of dividends, payment of capital loans and communication.

In addition, the purpose of processing personal data is to organize the general meeting of shareholders, in relation to which personal data is processed for registration, providing information, verifying the identity and the right to participate, as well as for other meeting arrangements. In addition, the information is used to prepare the voting list of the general meeting and to print ballot papers, to arrange any votes and to fulfill other rights and obligations set forth in the Limited Liability Companies Act and our Articles of Association. Information is also used to prepare and execute our various events and travel arrangements.

4 Data Content of the Register and the Groups of the Data Subjects

The register includes your following personal data as a shareholder or a representative of the shareholder:

- name
- contact information

- personal identity code/date of birth/business ID
- information of bank account and book-entry account
- number of shares by their class and the differences in the rights they create, a pledge encumbering the shares or other equivalent right, current value of the shares
- the amount of capital loans and their interest
- information concerning registration and participation in shareholders' general meetings, incl. information of impartiality, representative of a shareholder, special needs and voting data
- information on electronic registration to different events and special needs related to them
- data logs collected of the use of extranet service
- passport copies if the Act on Detecting and Preventing Money Laundering and Terrorist Financing so requires

Personal data is collected from you and from Euroclear Finland Oy.

5 To whom do we disclose and transfer data to and do we transfer data outside the EU or EEA?

We do not disclose data from the register to external parties.

We use an external service provider, Euroclear Oy for the technical execution and maintenance of the shareholders register and the processing of personal data therein. We have outsourced IT management partly to external service providers, on whose managed and protected servers the personal data is saved.

Personal data is not transferred outside the EU or EEA by Ponsse Plc. However, in limited cases, our service providers may provide certain support or other services that may involve processing data from outside the EEA. Unless the country to which the data is transferred has received the EU Commission's adequacy decision, we apply other appropriate protective measures to ensure the protection of personal data, for example by applying standard contract clauses in accordance with the European Commission's decision on the transfer of personal data to third countries.

6 The Principles Concerning the Protection of the Register and the Retention Periods

Only those of our employees, who on behalf of their work have the right to process personal data, are entitled to use the systems containing personal data. Each user has a personal username and password to the system. The data is collected into databases, that are secured with firewalls, passwords, and other technical measures. The databases and their backups are in locked premises and can only be accessed by certain pre-designated persons.

Personal data in the share register is retained for 10 years after the termination of ownership.

Personal data marked or attached to the minutes of the shareholders' meeting shall be retained as a part of the minutes, as required by the Limited Liability Companies Act. Other data shall be destroyed when they are no longer necessary for drawing up the minutes or ensuring the correctness of the data thereof.

7 What are your rights as a data subject?

You have the right to inspect the personal data stored in the register concerning yourself and the right to demand rectification or erasure of the data.

You have the right to object or to demand restriction of the processing of your data and to lodge a complaint with the supervisory authority.

On grounds relating to your particular situation, you also have the right to object other processing activities when the legal basis of processing is the legitimate interest. In connection with your request, you shall identify the specific situation, based on which you object to the processing. We can refuse the request of objection only on legal grounds.

8 Who can you contact?

The contacts and requests concerning this privacy notice must be submitted in writing or in person to the person mentioned in section two (2).