

## **PRIVACY NOTICE**

### **KOTIPIZZA GROUP OYJ EXTRAODINARY GENERAL MEETING**

This privacy notice describes how Kotipizza Group Oyj (“**Company**” or “**Controller**”) processes the personal data of shareholders and the proxy representatives. This privacy notice shall be applied to the processing of the personal data of the participants of the extraordinary general meeting on 12 February 2019.

“*Personal data*” refers to all information relating to a data subject which she/he can be identified from directly or indirectly as defined in the EU General Data Protection Regulation (2016/679), (“**GDPR**”). The information that does not allow direct or indirect identification of a data subject are not personal data. The Company commits to comply with GDPR, other applicable legislation and good processing practices with regard to processing personal data.

#### **1. CONTACT INFORMATION OF THE CONTROLLER**

Controller: Kotipizza Group Oyj (Business ID: 2416007-6)

Point of contact: Janne Reimari

Email: [janne.reimari@kotipizzagroup.com](mailto:janne.reimari@kotipizzagroup.com)

Address: Hermannin rantatie 2 B, 00580 Helsinki

#### **2. PURPOSE AND LEGAL BASIS OF PROCESSING OF PERSONAL DATA**

The personal data is processed for the following purposes:

- In order to collect the registrations for the extraordinary general meeting on 12 February 2019 and also for ascertaining a registrant’s identity and that she/he has the right to participate in the general meeting.
- In order to print the list of participants, voting list and ballots and for arranging any voting.
- Additionally, for other purposes related to arranging the general meeting.

The list of participants will be annexed to the minutes of the general meeting.

The purpose and legal basis of processing the personal data of data subjects is primarily the legal obligations of the Company, which are based on the Limited Liability Companies Act (642/2006, as amended) related to the obligations of organizing the general meeting and other applicable legislation that binds the Company. Providing such data is necessary for the compliance with the statutory obligations.

#### **3. COLLECTED DATA AND THE SOURCES OF THE DATA**

The personal data will be collected primarily from the data subjects.

When registering for a general meeting, a shareholder provides information about himself/herself. The information will be entered into a register maintained by the Company.

##### **The personal data that shall be processed:**

- Name, personal identity number, address, phone number, email address
- Book-entry account number
- Name of a possible assistant or proxy representative and the personal identity number of the proxy representative

##### **Personal data from other sources:**

The information will be compared to the Company’s shareholders’ register maintained by Euroclear Finland Oyj and ownership data will be picked out from the shareholders’ register.

Additionally, when giving a proxy, the shareholder provides the required personal data regarding the proxy representative.

#### **4. RETENTION OF THE PERSONAL DATA**

The Company will retain the personal data as long as necessary to fulfil the purposes outlined in the privacy notice unless a longer retention period is required by law (for example regarding obligations and responsibilities related to special legislation, accountancy or reporting).

The minutes, list of participants and other material from the extraordinary general meeting will be retained permanently.

The Company's shareholders' register will be updated constantly.

## **5. THE PROCESSORS AND RECIPIENTS OF PERSONAL DATA**

All the companies belonging to the Kotipizza Group, can process personal data according to the data protection legislation. The personnel involved with the processing are committed to confidentiality obligations.

The personal data shall may be disclosed to Euroclear Finland Ltd. Additionally, the Company may have to disclose personal data to the Company's third-party service providers, such as service providers providing IT-systems and legal counselling.

The Company may also have to disclose personal data in emergencies and other unexpected situations in order to save a person's life or for the protection of health and property. Additionally, the Company may have to disclose the personal data of a data subject if the Company is part of legal proceedings or other dispute resolution proceedings.

If the Company is part of a merger, business transaction or other re-organisation of the Company, it may have to disclose the personal data of data subjects to third parties.

The Company does not disclose the personal data of a data subject to third parties for direct marketing, marketing research or for other similar purposes.

Disclosure of data to third parties will be executed primarily through data transfers but data can also be disclosed by other means, such as via phone or letter.

## **6. TRANSFER OF PERSONAL DATA TO A THIRD COUNTRY OR INTERNATIONAL ORGANISATION**

The data will not be transferred outside EU/EEA nor to international organisations.

## **7. DATA PROTECTION AND CONFIDENTIALITY**

The Company will process the personal data in a way that aims to ensure the appropriate security of the personal data including protecting it from unauthorised processing, also from accidental loss, destruction or damage.

The Company uses the appropriate technical and organisational measures in order to keep the data secured, including the use of firewalls, encryption techniques and appropriate management of access control, guidance for the personnel participating in the processing of personal data and guidance for the third-party contractors.

Only the assigned personnel can process the personal data within the Company. All of them are committed to confidentiality obligations. The Company can use third party contractors or service providers regarding processing personal data according to this privacy notice. In this case the Company will ensure with sufficient contractual measures that the personal data is processed appropriately and lawfully.

## **8. RIGHTS OF THE DATA SUBJECTS AND EXECUTION OF RIGHTS**

### **Right of inspection and right of access**

A data subject has the right of inspection and access to the information related to him/her and by request he/she has the right to have the information in writing or in electronic form.

The request for inspection shall be made either in writing or in electronic form. The request shall be appointed to the Controller's point of contact mentioned in this privacy notice. The identity shall be confirmed prior giving the information. The request shall be answered within a reasonable time, however at the latest within one month from presenting the request and confirming the identity.

## **Right to rectification**

The data subject has the right to obtain the rectification of inaccurate data. The request shall be appointed to the Controller's point of contact mentioned in this privacy notice. The request shall be answered without undue delay, however at the latest within one month from presenting the request and confirming the identity. If the request is denied, the data subject shall be informed of this in writing.

## **Other rights of the data subject**

The data subject also has other rights according to the applicable data protection legislation, such as the right to data portability, the right to restrict processing, the right to object processing and the right to erasure.

## **9. RIGHT TO LODGE A COMPLAINT TO THE SUPERVISING AUTHORITY**

The data subject shall have the right to lodge a complaint to the data protection ombudsman if the data subject considers that his/her personal data has been processed against the applicable data protection legislation. The contact information of the data protection ombudsman:

### **The office of the data protection ombudsman**

Address: Ratapihantie 9, 6<sup>th</sup> floor, 00520 Helsinki

Postal address: PL 800, 00521 Helsinki

Email: [tietosuoja@om.fi](mailto:tietosuoja@om.fi)

Phone number: 029 56 66700

## **10. CHANGES TO THE PRIVACY NOTICE**

The Company might have to change this privacy notice from time to time. The changes might also be based on the amendment of the data protection legislation. The data subject will be notified about the changes on the website of the Company.

This privacy notice was published on 21 January 2019.