

## LEADDESK PLC PRIVACY STATEMENT – ANNUAL GENERAL MEETING

### 1 DATA CONTROLLER AND CONTACT PERSON

Data controller	Contact person
LeadDesk Plc (“LeadDesk”) Hämeentie 15 FI-00500 Helsinki	Eveliina Puustjärvi Head of Legal +358 (0)50 448 8496 eveliina.puustjarvi@leaddesk.com

### 2 PURPOSE OF AND LEGAL BASIS FOR THE PROCESSING OF PERSONAL DATA

This Privacy Statement describes the personal data processing related to LeadDesk Plc’s Annual General Meeting.

The purpose of processing personal data is to enable carrying out the General Meeting of the controller in accordance with the law .

Personal data is processed only for purposes necessary for the organisation of the General Meeting, such as to verify the identity of the registering person and their right to participate, to prepare a list of participants, a list of votes and possible voting tickets, and to organise voting.

A list of participants comprising the following personal data of the persons attending the meeting will be drafted and appended to the minutes of the Annual General Meeting: the name of the shareholder and/or their possible proxy representative, aid or other representative as well as the number of shares and votes.

The technical implementation of the registration system, and advance voting is carried out by Euroclear Finland Oy.

The legal basis for the processing of personal data is in particular compliance with the legal obligations to which LeadDesk is subject based on the Finnish Limited Liability Companies Act (624/2006) and other legislation. Personal data may also be processed on the basis of a legitimate interest of LeadDesk or a third party, in which cases the legitimate interest is in particular justified purposes related to the business of LeadDesk, such as administrative activities, ensuring of physical security, protection of property, investigation of misuse, as well as potential merger and acquisition activities.

The provision of personal data as specified in this Privacy Statement is necessary in order for LeadDesk to fulfil its legal obligations. If the data subject does not provide their personal data to LeadDesk as described in this Privacy Statement, the sending and handling of the shareholder’s registration and voting in advance is not possible, which means that the data subject cannot participate in the Annual General Meeting.

### 3 PROCESSED PERSONAL DATA

The shareholder’s and their possible proxy representative’s name, personal identity code and/or business ID, address, telephone number, voting information, number of shares and votes, authentication method, basis of representation, date of registration, and possible information on assistant and power of attorney as well as any additional information provided in connection with the registration. For technical maintenance and monitoring of the service, log data on registration as well as the user’s IP address are also recorded.

The register contains the list of shareholders on the record date created by Euroclear Finland for the General Meeting, containing, e.g., the shareholder's name, personal identity number/business ID, address, and number of shares.

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

#### **4 REGULAR SOURCES OF DATA**

Personal data is mainly collected from the person themselves or from their representative in connection with the registration and advance voting for the General Meeting. Based on the data provided in connection with the registration, LeadDesk will compare the provided information to the list of LeadDesk's shareholders maintained by Euroclear Finland Oy and gather the registering person's shareholding information from the list of shareholders.

#### **5 DISCLOSURES AND TRANSFERS OF PERSONAL DATA**

Based on the information in the register, a list of votes and a summary of the votes cast are established and attached to the minutes of the meeting. The list of meeting participants contains the name, voting ticket number (participant number), number of shares and votes and basis for representation of the shareholder and possible representative and/or aid.

In accordance with the Limited Liability Companies Act, a list of shareholders is displayed at the General Meeting containing the names of the shareholders, the municipality and the number of shares and votes on the record date of the meeting. The list also contains information on nominee registered shareholders who are temporarily registered in the list of shareholders for the General Meeting.

LeadDesk may disclose personal data to competent authorities when required to do so under applicable legislation, to prepare for legal proceedings, or to defend against a claim within the limits permitted or required by applicable law at any given time. If LeadDesk reorganises its business, personal data may be disclosed to the purchaser candidates and their representatives in accordance with applicable law in force at any given time.

LeadDesk may use service providers for the processing of personal data described in this Privacy Statement and transfer personal data to such service providers to the extent necessary in order for the service providers to be able to provide LeadDesk with the agreed services. Data is not disclosed for commercial purposes.

Personal data is not otherwise disclosed or transferred outside the EU or the European Economic Area.

#### **6 BASIS FOR REGISTER PROTECTION**

Physical material is stored in a locked room accessible only by persons entitled to the data.

Electronic material is stored in a data room that meets the requirements set for the processing of personal data. The connection from the user's browser to the server is encrypted. Access to the register is limited to the employees of the controller and subcontractors who need and process data to organise the General Meeting.

#### **7 STORAGE PERIOD OF THE PERSONAL DATA**

Personal data recorded in or appended to the minutes of the General Meeting will be stored indefinitely as part of the minutes of the General Meeting as defined in the Finnish Limited Liability Companies Act (624/2006). Other personal data will be destroyed securely once they are no longer necessary for drafting or ensuring the correctness of the minutes.

## **8 RIGHTS OF THE DATA SUBJECT**

The data subject may use the rights related to the processing of their personal data specified below with regard to LeadDesk. The exercise of the rights is a personal right of the data subject and requires identification.

- Right of access: The data subject has the right to get a confirmation from LeadDesk on whether LeadDesk processes personal data concerning the data subject, as well as the right to access such data. LeadDesk may request the data subject to specify their request, amongst others, with regard to the details of the data to be delivered.
- Right to rectification: The data subject has the right to have LeadDesk rectify inaccurate personal data concerning them processed by LeadDesk, and to have incomplete personal data processed by LeadDesk to be completed.
- Right to be forgotten: The data subject has the right to have LeadDesk erase personal data related to them. LeadDesk has the obligation to erase such data if there is no longer a legal ground for processing such data and the legal obligation binding LeadDesk related to the storing of the personal data has terminated.
- Right to restriction of processing: In certain cases prescribed by law, the data subject may have the right to have LeadDesk restrict the processing of their personal data.
- Right to object to processing of personal data: In certain cases, the data subject may have the right to object to the processing of their personal data. The right to object is applicable to such situations in particular where the processing of personal data is based on the controller's legitimate interest. In such situations, LeadDesk has to comply with the data subject's request, unless LeadDesk demonstrates compelling legitimate grounds for the processing that override the interests, rights and freedoms of the data subject or the personal data is needed for the establishment, exercise or defence of legal claims.

Any requests regarding the exercise of these rights should be directed to the contact person mentioned in section 1 above.

If the data subject believes that LeadDesk has processed personal data in contravention of this Privacy Statement or applicable legislation regarding the processing of personal data and data protection, the data subject has the right to lodge a complaint with competent authority, which in Finland is the Data Protection Ombudsman, in accordance with the competent authority's instructions. The Data Protection Ombudsman's website is available at <https://tietosuoja.fi/en/home>.