

## DESCRIPTION OF PROTECTION OF PERSONAL DATA

This is a combined description of the file and information on the processing of personal data of General Meeting Register held by SRV Group Plc (Finnish Personal Data Act 523/1999, sections 10 and 24).

### 1 Data controller

SRV Group Plc  
Business ID: 1707186-8  
PL 555, 02601 Espoo, Finland  
[www.srv.fi/en](http://www.srv.fi/en)

### 2 The person in charge

General Counsel Johanna Metsä-Tokila  
PL 555, 02601 Espoo, Finland  
tel. +358 (0)20 145 5200  
firstname.surname@srv.fi

### 3 Name of the register

SRV Group Plc's Annual General Meeting Register 2018

### 4 The purpose for processing of personal data

Personal data is collected when a person registers online, by telephone or post to SRV Group Plc's Annual General Meeting, which is held on 20 March 2018. Personal data is collected in order to confirm a person's identity as well as to confirm that the person is entitled to participate in the Annual General Meeting. In addition, personal data may be processed for other purposes related to the organising of the Annual General Meeting. A list of participants is annexed to the minutes of the Annual General Meeting. The list of participants forms on basis of persons attending the Annual General Meeting. Euroclear Finland Ltd is responsible for the technical implementations of the registration service of the Annual General Meeting and acts as the administrator of the registration service. Euroclear Finland Ltd collects log information from the registration site and may use such information for technical supervision and ensuring the reliability of the service as well as for compilation of statistics.

Personal data is not used for commercial purposes or for direct marketing.

### 5 Content of the register

When a shareholder registers online, Euroclear Finland Ltd takes care of the technical implementation of data collection. The telecommunications connection from the user's browser to the server of Euroclear Finland Ltd is encrypted with SSL. The following identifying information may be collected through this service: name, personal identification code, address, telephone number, e-mail address and securities account number.

A securities account number is used solely for identification purposes in Euroclear Finland Ltd's system and it shall not be disclosed to the Data controller. SRV Group Plc is entitled as the Data controller to receive voting information of an individual shareholder in order verify outcomes of voting results.

Whether a person registers to the Annual General Meeting by telephone, SRV Group Plc's employee may request aforementioned identifying information, which are entered into the Euroclear Finland Ltd's system. A letter of registration must include all aforementioned identifying information excluding securities account number. Identifying information is entered in to the Euroclear Finland Ltd's system by SRV Group Plc's employee.

## **6 Regular sources of information**

When a shareholder registers online, he/she enters information about himself/herself. Using the entered personal identification code as a reference, the system compares the entered information with the shareholders' register of the company maintained by Euroclear Finland Ltd and collects the person's share ownership information from the shareholders' register. When a person authorizes a proxy representative, he or she shall enter the proxy representatives identifying information necessary for the registration.

Whether a person registers to the Annual General Meeting by telephone or by post, SRV Group Plc's employee shall verify the person's ownership in the company from the shareholders' register and enter necessary identifying information needed for a registration to the registration service held by Euroclear Finland Ltd.

## **7 Regular destinations of disclosed data or transferring of the data outside of EU or EEA**

The data will not be disclosed or transferred.

## **8 The principles of securing the data register**

### **A. Manual data**

1. Physical documents of registration (manual data) are stored in the headquarters of SRV Group Plc in a locked room, in which only SRV Group's employees participating in organizing of the Annual General Meeting have access to the register.
2. Manual data is transferred for its relevant parts to the electronic system described in section B by SRV Group Plc's employees participating in organizing of the Annual General Meeting. The principles regarding securing of the electronic system are defined below.

### **B. Electronically entered information**

1. Euroclear Finland Ltd takes care of the technical implementation of data collection and is responsible for maintaining the register.
2. The telecommunications connection from the user's browser to the server of Euroclear Finland Ltd is encrypted with SSL. The sites use technical data protection aiming at keeping the entered information intact and available only to those who are entitled to access the information.

## **9 Right of access and how to exercise the right**

Regardless of secrecy provisions, a shareholder is entitled to access the register in order to check what identifying information has been collected or that there is no information pertaining to him or her in the data file. Exercising the right shall require submitting sufficient search criteria. The Data Controller shall inform the shareholder of the regular

sources of information as well as to what the information is used for and where it is regularly disclosed.

A shareholder, who wishes to access the data on him or her, shall present a request of access to the Data Controller in writing by a signed letter or in corresponding fashion or personally at the headquarters of the Data controller.

Aforementioned requests of access shall be addressed to General Counsel Johanna Metsä-Tokila either by email (firstname.lastname@srv.fi) or by post to the address PL 555, 02601 Espoo, Finland.

## **10 Rectification of the data**

The Data controller shall, on its own initiative or at the request of the data subject, without undue delay rectify, erase or supplement personal data contained in its personal data file and erroneous, unnecessary, incomplete or obsolete data.

The Data controller shall also prevent the dissemination of such data, if this could compromise the protection of the privacy of the data subject or his/her rights.

If the Data controller refuses the request of a shareholder of the rectification of an error, a written certificate to this effect shall be issued. The certificate shall also mention the reasons for the refusal. In this event, the shareholder may bring the matter to the attention of the Data Protection Ombudsman.

The Data controller shall notify the rectification to the recipients to whom the data have been disclosed and to the source of the erroneous personal data. However, there is no duty of notification if this is impossible or unreasonably difficult.

Aforementioned requests of rectification shall be addressed to General Counsel Johanna Metsä-Tokila either by email (firstname.lastname@srv.fi) or by post to the address PL 555, 02601 Espoo, Finland.