

Privacy statement for DNA Plc shareholder register and general meeting attendance list

DNA Plc processes personal data in accordance with this privacy statement and applicable data protection legislation. This privacy statement describes the types of personal data we collect, the grounds for processing and the rights of data subjects regarding the DNA shareholder register and general meeting attendance lists.

1. Data controller and contact details

Data controller: DNA Plc, Business ID: 0592509-6, P.O. Box 10, FI-01044 DNA (street address Läkkipäntie 21, FI-00620 Helsinki).

DNA PLC is responsible for the processing of personal data. DNA has also appointed a Data Protection Officer. If you have any questions about this privacy statement or the processing of your personal data or you wish to exercise your rights under data protection legislation, please contact us by mail at the above address or by email at palvelu@dna.fi. If you are not satisfied with the reply you receive, you may also contact the Data Protection Ombudsman at www.tietosuoja.fi/en.

2. Purpose and grounds of processing personal data and categories of personal data

Under the Limited Liability Companies Act, the Board of a limited liability company must maintain an up-to-date shareholder register of the shares incorporated in the book-entry system and of their shareholders, containing the name of the shareholder or nominee, personal identity code or other identifying code, contact details, payment address and taxation information, quantity of shares by share class, and the account operator maintaining the book-entry account on which the shares are registered.

Under the same Act, listed companies must also maintain registers of general meetings, including the shareholder register at the record date, a list of shareholders that have announced their attendance at the meeting, and a list of shareholders and their assistants and proxy representatives in attendance at the meeting. These lists include information such as the shareholder's name, personal identity code, address, telephone number, email address, book-entry account number, quantity of shares and votes, voting data and information on assistants and proxy representatives.

The book-entry account number will be used only for identification in the systems of Euroclear Finland Oy, and it will not be disclosed to DNA. DNA is entitled to receive the voting data on an individual shareholder in order to check the correctness of the voting results.

3. Sources of personal data

Personal data in the shareholder register are obtained from the book-entry system, which is maintained and controlled by Euroclear Finland Oy. The personal data in the book-entry system are obtained from account managers and authorities.

Information in the general meeting lists are collected from data subjects themselves. Shareholders can register for a general meeting on the Internet or by email, phone or letter. If the shareholder registers online, Euroclear Finland Oy is responsible for the technical implementation of the data collection. Based on the personal identity code, the registration system compares the information given with DNA Plc's shareholder register, maintained by Euroclear Finland, and picks the ownership data of the registering shareholder from the shareholder register. When submitting a power of attorney or attending with an assistant, the necessary personal data must also be provided on such persons.

4. Publicity of the data and their disclosure and transfer to third countries

Under the Limited Liability Companies Act, the shareholder register must be kept publicly available. The DNA shareholder register is maintained by Euroclear Finland on behalf of DNA. The shareholder register can be viewed at the Euroclear Finland office at the central securities depository.

Everyone has the right to receive a copy of the shareholder register or a part thereof against compensation for the expenses, provided that the Limited Liabilities Company Act does not restrict the disclosure of information. Under the Limited Liability Companies Act, the following personal data may not be disclosed: second part of the personal identity code, payment and taxation details and information on to which consignment account the units or shares entered by the unit holder or shareholder for sale have been recorded.

The shareholder register maintained by Euroclear Finland on behalf of DNA is publicly accessible as follows:

Anyone has the right to view the shareholder register on a public computer located in the Euroclear Finland head office, in accordance with the Limited Liability Companies Act.

- The following information on shareholders can be accessed on the public computer: shareholder's name and address or domicile, date of birth, nationality, ownership details, waiting list amounts and reason for inclusion on the waiting list, and information on possible co-owners.

A copy of the shareholder register or part thereof in printed or electronic form may be ordered separately from Euroclear Finland.

- Information in the shareholder register may be disclosed for research, statistics and editorial purposes, among others.
- Information in the shareholder register may also be disclosed for direct marketing purposes or market research and opinion surveys, unless the data subject has not objected to such disclosure.

Under the rules of Euroclear Finland, the temporary shareholder register produced for a general meeting is public for the date of the meeting and its preceding three business days similarly to the actual shareholder register.

The following information on the 100 shareholders with the largest quantity of shares are also disclosed on the DNA website: name, quantity of shares, percentage of all shares, change in the number of shares and percentage in the past month, and market value.

DNA is entitled to obtain more extensive information on its shareholders from Euroclear Finland as follows: shareholder's name, address, identifying code, language, nationality, sector and potential customer restriction, ownership details, waiting list amounts and reason for inclusion on the waiting list, information on possible co-owners and information on the account manager.

In the case of shares issued in the book-entry system, Euroclear Finland shall disclose information required for taxation on book-entry securities, their owners and beneficiaries of the revenue to the Tax Administration. The disclosed information includes the holder's name and personal identity code, name and class of the security, quantity of securities and ISIN code.

If a local register office has ordered that the disclosure of personal data of a shareholder be restricted under the Act on Population Information System and Certificate Services Provided by the Population Register Centre, and the company has been notified of said restriction, the municipality, address and other contact details recorded in the shareholder register for the shareholder in question may be disclosed only to authorities in the event that the conditions stated in the Act are met. The restriction on disclosure does not

apply to a possible contact address listed in the shareholder register. This information may be disclosed to parties other than authorities.

Data may be processed also outside the EU and EEA using data transfer mechanisms approved by the Commission of the European Union, such as the standard contractual clauses approved by the Commission of the European Union. The processing of personal data in the book-entry system is carried out in third countries reported by Euroclear Finland, and Euroclear Finland is responsible for concluding the necessary agreements.

5. Retention periods

Under law, in the case of information pertaining to the book-entry register, including personal data, Euroclear Finland shall retain the data indefinitely as the controller of the book-entry register. Information pertaining to general meetings shall be retained for as long as the company exists.

6. Rights of data subjects

Data subjects may exercise the rights listed below by contacting the following address by mail: DNA Plc, P.O. Box 10, FI-01044 DNA or by email at palvelu@dna.fi. The request must be sufficiently specified. Requests are assessed on a case-by-case basis, and DNA must verify the identity of the data subject before carrying out the request. Our typical response time is within one month. We will inform you if we cannot fulfil the request in all respects, such as erase data that we have a statutory obligation to store.

- Right of access: Data subjects have the right to access and review their personal data stored by us or verify that we do not store any of their personal data.
- Right to rectify inaccurate or incomplete data: If the data we store are inaccurate or incomplete, the data subject has the right to request their rectification.
- Right to erasure: The erasure of data may be requested, provided that
 - the data is no longer required for its specified purpose, and
 - there are no longer legal grounds for its processing.

Personal data that must be processed to comply with statutory obligations may not be erased.

- Right to restrict processing:
- Data subjects may request that we restrict the processing of their personal data if they contest the accuracy of the data and the lawfulness of processing. The restriction request means that the data will only be stored until their accuracy has been verified.
- Right to object to processing: Data subjects have the right to object to processing by DNA for purposes of targeted marketing and direct marketing. In this case, the data subject's details are added to DNA's register for opting out of marketing. Please note that in the event that a data subject has objected to data processing for marketing purposes, DNA may still send messages related to the maintenance of the customer relationship and services, such as announcements on changes to contracts and service disruptions.
- Right to transfer data: As the processing of personal data is not based on consent or agreement, data subjects do not have the right to transfer their data to another controller.

7. Principles of data protection

DNA provides services in an industry where information systems and data protection are an integral part of our operations. For this reason, we ensure that our information security is always at a high level. Personal

data are processed only by designated employees bound by professional secrecy. Data are always processed confidentially. As the privacy of data subjects is of paramount importance to us, we ensure the effective protection of personal data and employ the necessary technical and organisational security measures to protect the data from unauthorised access, destruction, disclosure or other unlawful processing.

Our personnel are bound by professional secrecy. DNA personnel processing personal and identification data and individuals who process said data on behalf of DNA are bound by professional secrecy on data they process as part of their duties. The processing of personal data is a part of the orientation for new employees, and all employees receive periodic training on data protection matters. All employees are bound by an obligation of professional secrecy under law or as agreed and documented separately in individual employment contracts.

Management of access rights. DNA employs a system for managing the granting of access rights and the monitoring of their use. Personal data is processed only by those designated DNA employees or individuals working on behalf of DNA who are required to do so for the performance of their duties. Personal data is disclosed to requesting authorities or rightsholders only in the event that said authority or rightsholder is legally entitled to the data.

When DNA uses subcontractors to process personal data, such as Euroclear Finland, we ensure, by means of contractual arrangements and in the appropriate manner, a sufficient level of security and the careful and appropriate processing of the data in accordance with the requirements of legislation. The Act on the Book-Entry System and Settlement Activities provides for a specific obligation of secrecy that applies to personnel in the employment of account managers and their agents and Euroclear Finland. The Act on Book-Entry Accounts and the policies of Euroclear Finland provide for the security matters related to the book-entry register in further detail.

8. Amendments to the privacy statement

We may update this privacy statement due to changes in our operations, privacy policy or legislation. We recommend that you review the content of our privacy policy periodically.