

Data Protection Description for Shareholder Data

Data subjects

- Pöyry PLC's shareholders who are natural persons

Data content

- Name, Number of shares and percentages of shares from the total amount, Change in the amount and percentage of shares in comparison to the previous month ("Public Shareholder data");
- Number of votes and percentages of votes from the total amount, Personal identification number, Address;
- Phone number and email address if the data subjects provides them in connection with a registration to Annual General Meeting.

All this personal data together is hereafter referred to as "Shareholder data".

Purpose of processing

The data is gathered due to legal requirements to hold the information or to provide authorities or stock exchange with the information they require.

Transfer of data

The Shareholder data is transferred to reliable service providers who process the personal data on behalf of Pöyry within EU. All data transfers are covered by agreements as required by law.

The Public Shareholder data is published on Pöyry's website regarding the 100 largest shareholders. Other Shareholder data may be publicly available to comply with the Section 3:17 of the Finnish Limited Liabilities Companies Act.

Transfer outside EU/EEA

The public data is accessible all over the world. Other data is not transferred outside EU/EEA.

Retention period

The data is stored as long as Pöyry has a legal requirement to store it.

Rights of individuals

The right of access

An individual may access his/her data by submitting a detailed request via email to privacy@poyry.com.

The right to rectification

An individual may rectify his/her data by submitting a detailed request to privacy@poyry.com and he/she should do this if Pöyry holds inaccurate data regarding him/her.

The right to erasure

An individual may ask to erase his/her data by submitting a detailed request to privacy@poyry.com.

The individual may ask to erase his/her data if:

- the data is no longer needed for its original purpose and no new legal purpose exists;
- the processing is based on the individual's consent and the individual withdraws the consent;
- the individual objects the processing, and Pöyry has no overriding grounds for continuing the processing;

- the data has been processed unlawfully; or
- erasure is necessary for compliance with EU law or the national law of the relevant Member State.

The right to restrict processing

An individual may ask to restrict the processing of his/her data by submitting a detailed request to privacy@poyry.com.

The individual may ask to restrict the processing of his/her data if:

- the individual contests the accuracy of the personal data;
- the data is processed based on legitimate interest of Pöyry;
- he/she thinks that the processing is unlawful; or
- Pöyry no longer needs the personal data but the individual requires the data to establish, exercise or defend a legal claim.

The right to data portability

An individual may ask to transport his/her data by submitting a detailed request via email to privacy@poyry.com.

The individual may ask his/her data to be transmitted to another controller if:

- the personal data is processed by automated means;
- the data subject has provided the personal data to Pöyry; and
- the basis for processing is contractual necessity.

The right to object

An individual may object the processing of his/her data processed based on legitimate interest of Pöyry by submitting a detailed request via email to privacy@poyry.com.

The right to contact data protection authority

An individual has the right to contact the relevant data protection authority regarding the processing of his/her data.

Data security measures

Pöyry is committed to securing personal information. Pöyry protects the confidentiality and security of information by using physical, electrical and administrative controls. All personal data is collected only for legitimate purposes and not processed in a manner that is incompatible with those purposes. The amount of data is minimized to what is necessary and not stored for longer than is necessary for the purposes. The personal data is kept up to date and protected against unauthorized or unlawful processing and against accidental loss, destruction or damage with the available appropriate technical or organisational measures. Pöyry's systems are protected from unapproved external access. Access to systems containing personal data is controlled via approval processes that consider the person's role and justified business need. The use of the system and access to information is limited on an individual level and protected by using personal user access rights.

Data controller

Pöyry PLC
Jaakonkatu 3
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Contact information of data controller

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