

Privacy Statement – List of Persons Discharging Management Responsibilities and Closely Associated Persons

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1. Controller

Uponor Corporation
Ilmalantori 4
FI-00240 Helsinki
Finland

Uponor Corporation hereinafter also "Uponor".

2. Contact Information

Reetta Härkki
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FI-00240 Helsinki, Finland
Tel. +358 (0)40 8643322
Email: reetta.harkki@uponor.com

3. The purpose and legal basis for the processing of personal data

The purpose of the processing of personal data is to maintain a list of persons discharging managerial responsibilities at the Company and persons closely associated with them as well as transactions conducted by them.

The legal basis for processing data is to comply with the regulation governing the transactions of persons discharging managerial responsibilities and persons closely associated with them, as set forth in Article 19 of the Market Abuse Regulation (EU) (596/2014).

4. Group of Data Subjects

Uponor's management and their closely associated persons.

5. Content of the Personal Data Processed

Uponor processes information such as:

- First name(s), surname(s) and birth surname(s) (if different)
- Position of the manager
- Date of birth and National Identification Number (if applicable) (natural persons) and business ID or equivalent foreign ID (legal entities)
- With respect to persons closely associated; the grounds for being regarded as "closely associated".
- Date on which the person commenced and ceased discharging managerial responsibilities or the date on which the person became or stopped being closely associated with a manager.
- (Personal) contact information (phone number, e-mail, postal address) and professional contact information of the manager (phone number, e-mail, postal address)
- Nationality of persons closely associated (natural persons). Guardian e-mail in case of dependent child
- Representative e-mail in case of legal person

- Signature by drawing or with bank credentials, only on managers and closely associated persons (guardian if dependent child and representative if legal person)

6. Regular Sources of Data

The personal data is primarily collected from each data subject themselves, by Uponor personnel or through website or applications or from the employer of the data subject.

Personal data may in some situations, as allowed by applicable legislation, be collected from other sources than directly from the data subject, e.g., from Uponor's processing of employee data.

7. Disclosure and Transfer of Personal Data Outside the EU/EEA Area

Data may be disclosed in accordance with applicable legislation to the competent authorities, such as the Finnish Financial Supervisory Authority.

Uponor uses an external service provider for listing Persons Discharging Managerial Responsibilities and their closely associated persons. The service provider and its subcontractors act as data processors of Uponor, and the personal data will be processed by such service providers only for the provision of services to Uponor and on behalf of Uponor.

Personal data is not regularly transferred to countries outside the European Union or the European Economic Area. For technical reasons and for reasons related to the use of data, the personal data may be stored on servers of external service providers who may process the data on behalf of Uponor outside European Union or the European Economic Area on an irregular basis. In the event of any such transfer, appropriate safeguards will be implemented, such as standard contractual clauses or other mechanisms required by relevant data protection laws.

8. The storing and retention of personal data

The data is processed and stored by electronic means via the platform provided by the service provider.

Personal data will be retained for as long as is necessary and required by applicable law. As a rule, the retention period is 5 years after the expiry of the status of a data subject as a Person Discharging Managerial Responsibilities or as a closely associated person.

9. Rights of the Data Subjects

Unless any limitations apply, each data subject has the right to access all personal data Uponor have on them. Each data subject also has the right to request that Uponor corrects, erases or stops using any erroneous, unnecessary, incomplete or obsolete personal data.

The rights above may be exercised via [a form](#) on Uponor website or by contacting the person mentioned in Section 2 above. Uponor processes all requests as soon as possible. If dissatisfied with the decision or actions of Uponor, each data subject has the right to lodge a complaint with their country's data protection authority.

10. Principles of Securing Personal Data – Technical and Organizational Controls

Uponor shall ensure that sufficient technical and organisational personal data protection measures are implemented and maintained throughout its own organisation. In addition, Uponor shall ensure that any transfer or disclosure of personal data described in this privacy statement to any third party is subject to Uponor having ensured an adequate level of data protection by agreements or by other means required by law.

Technical controls:

Physical material is stored in locked spaces with restricted access. Any IT systems are secured by means of the operating system's protection software. Access to the systems requires entering a username and a password and data transfers happen via high encryption channels.

Organisational Controls:

Uponor and the technical implementation provider have instructed their organisations on the processing of personal data. The access to IT systems containing personal data is limited to persons entitled to access based on their work assignments or role and who are subject to confidentiality obligations regarding the personal data.