

## Privacy Statement – Uponor Corporation Extraordinary General Meeting 2023

Last updated: 10.11.2023

### 1. Controller

Uponor Corporation  
Ilmalantori 400240 Helsinki, FINLAND  
Tel. +358 (0)20 129 211

### 2. Contact Person

Legal Specialist Noora Surakka  
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Ilmalantori 4, 00240 Helsinki  
Tel. +358 (0)20 129 2839  
noora.surakka@uponor.com

### 3. Data Subjects

Persons who register to and/or attend the Extraordinary General Meeting of Uponor Corporation on 4 December 2023.

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

The personal data is processed only for purposes necessary to organize the Extraordinary General Meeting of Uponor Corporation on 4 December 2023, including the following:

- enabling the registration of shareholders, proxy representatives or counsels to general meeting via the registration system
- identifying of shareholders and verification of ownership
- preparing a list of participants, a list of votes and ballots, as well as for organizing any polling
- administrating the advance and online voting
- administrating the requests to speak
- preparing the minutes of Extraordinary General Meeting
- possible other purposes related to organising the Extraordinary General Meeting, including arranging the Extraordinary General Meeting online

The processing is based on the legal obligation to organize the general meeting according to the Finnish Companies Act, including the obligation to prepare minutes of the general meeting and the list of votes. The system used for registration to the general meeting and advance voting is maintained by Innovatics Ltd. The shareholder register is maintained by Euroclear Finland Oy.

### 5. The personal data processed

The personal data processed for the purposes provided in this data privacy statement include: the name of shareholder or proxy representative, date of birth or personal identification number and/or business ID, address, telephone number, e-mail address, authentication method, number of shares and votes, voting information, basis of representation, date of registration, any information on a possible counsel or proxy representative and the personal identification number of a proxy representative and any additional information given during registration. For persons attending the general meeting, the time the person arrives to and leaves from the general meeting will also be recorded.

The personal data processed also includes the list of shareholders on the record date, as referred to in the Limited Liability Companies Act, and the temporary list of shareholders of a limited liability company, both provided by Euroclear Finland Ltd. The record date list of shareholders includes personal data on e.g., the name of shareholder, personal identification number or business ID,

address, and number of shares. The temporary list of shareholders includes information on nominee registered shareholders that have registered to the general meeting and the number of their shares.

When using Innovatics Ltd system, the log data of registration and advance voting and the user's IP address will be collected for the purposes of technical maintenance and monitoring of the system. With respect to this personal data, Innovatics Ltd acts as an independent data controller.

## **6. Regular Sources of Data**

Mainly the personal data is collected directly from the data subject, their representative or counsel at time of registration. When registering to the general meeting and voting in advance using the online registration system, the shareholder submits the personal data. When using email, mail or phone, Uponsor Corporation or Innovatics Ltd enters the personal data and possible advance votes into the system on behalf of the shareholder. The online registration system uses the personal identification number of the shareholder to compare the data provided with Uponsor Corporation's shareholder register maintained by Euroclear Finland Ltd and retrieves the ownership information of the shareholder from the shareholder register.

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

Uponsor Corporation may disclose personal data to authorised third parties to the extent they participate in the processing of personal data for the purposes stated in this privacy statement and in accordance with and subject to the limitations imposed by applicable legislation. Uponsor Corporation does not transfer personal data outside EU/EEA. 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 Uponsor Corporation. To send confirmations of registration via text messages, Innovatics Ltd transfers certain information of the person registered to general meeting to a server located in Switzerland. Euroclear Finland Ltd may use authorised service providers located outside EU/EEA related to maintaining of the shareholder register. When a shareholder exercises their right to speak virtually, the shareholder's IP address and name may be processed by a service provider outside the EU or EEA.

Any transfers of personal data shall be made in accordance with the General Data Protection Regulation (2016/679) and any applicable mandatory legislation, as may be amended from time to time. Data transfers of personal data to authorised third parties is allowed to the extent such third parties participate in the processing of personal data for the purposes stated in this privacy statement. Any transfers are allowed only by incorporating the European Commission's Standard Contractual Clauses or other appropriate safeguards for data transfers as listed in the EU General Data Protection Regulation, which ensure that adequate data protection arrangements are in place.

## **8. The storing and retention of personal data**

The personal data may be retained only as long as necessary for the purpose for which it was collected, unless applicable law requires a longer retention period.

The minutes of the general meeting, lists of participants, appended list of votes and other material of the general meeting shall be retained permanently. In accordance with statutory obligations, the minutes of the general meeting and its appendices must be retained permanently throughout the entire operations of the company or a minimum of 10 years after the end of the financial year. The appended list of votes includes the name of the shareholder, number of the ballot and details on shareholding (number of shares and votes as well share class).

Innovatics Ltd retains personal data stored in the system used for registration and advance voting for a maximum of one year. Euroclear Finland Ltd retains personal data for four months from the closing of the meetings.

## **9. Rights of the Data Subjects**

Unless any limitations apply, the data subject has the right to access all personal data Uponsor Corporation has concerning the data subject. Each data subject also has the right to request that Uponsor Corporation corrects, deletes, or discontinues the use of any erroneous, unnecessary, incomplete, or obsolete personal data.

Any requests to exercise these rights should be directed to the contact person mentioned in Section 2 of this privacy statement. Uponsor processes all requests as soon as possible. If dissatisfied with the decision or actions of Uponsor Corporation, each data subject has the right to file a complaint to their national data protection authority.

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

Uponsor Corporation shall ensure that sufficient technical and organisational personal data protection measures are implemented and maintained throughout its own organisation. In addition, Uponsor shall ensure that any transfer or disclosure of personal data described in this privacy statement to any third party is subject to Uponsor Corporation 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. Innovatics Ltd stores the electronic material in a data centre that meets the requirements for processing personal data. When using the general meeting registration and advance voting system implemented and maintained by Innovatics Ltd, the connection between the user's browser and the server is encrypted.

### Organisational controls:

Uponsor Corporation and the technical implementation provider Innovatics Ltd have instructed their organisations on the personal data, and the access to IT systems including personal data is limited to persons who are entitled to access them based on their work assignments or role and who are subject to confidentiality obligations regarding the personal data.