

## PRIVACY NOTICE

This Privacy Notice describes the personal data processing relating to April 4, 2024 Outokumpu Annual General Meeting.

### 1 Data Controller

Name: Outokumpu Oyj  
Address: Salmisaarenranta 11, 00180 Helsinki, Finland  
Business ID: 0215254-2

### 2 Contact Person

Name: Monica Wiik  
Contact details: [monica.wiik@outokumpu.com](mailto:monica.wiik@outokumpu.com)

### 3 Name of the Register

Outokumpu Oyj's Annual General Meeting register.

### 4 Purpose for the Processing of Personal Data and Legal Basis

The purpose for collection of personal data is to organize and execute the Annual General Meeting according to law. The information is used for creating a list of participants and a voting list, to arrange advance voting, to ascertain registrant's identity and to enable shareholders of Outokumpu to attend events associated with Annual General Meeting, such as the webcast of the Annual General Meeting, which is only open to the shareholders.

Innovatics Oy is the technical service provider of the registration and advance voting system. The shareholders' register is maintained by Euroclear Finland Oy. The webcast of the Annual General Meeting is organized by Flik Oy.

In accordance with the General Data Protection Regulation (2016/679, "GDPR"), the primary legal basis for the processing of personal data is the data controller's statutory obligation to hold a general meeting based on the Finnish Limited Liability Companies Act (624/2006). The processing of personal data is also necessary for the purposes of the legitimate interests of the data controller, including organizing events associated with Annual General Meeting.

## 5 Contents of the Register

The register contains the shareholder's name, personal identification number/business ID, contact details, name of a possible proxy representative, personal identification number of the possible proxy representative, number of shares and votes, voting information, registration details and other additional information given during the registration, such as any possible information on assistant or proxy. Register also contains log information about the registration, participation and voting.

The register contains Euroclear Finland Oy's list of the shareholders at the record date, which contains e.g. the name of the shareholder, personal or business identification number, address and the number of shares.

The register contains Euroclear Finland Oy's temporary list of nominee registered shareholders which have registered to participate in the Annual General Meeting.

## 6 Sources of the Information

The shareholder enters the information about himself/herself and the advance votes are stored in the system when registering to the Annual General Meeting. If using a proxy representative, the representative enters the information about the shareholder and his/her advance votes.

When registering by email or mail, the information is entered by the data controller or Innovatics Oy.

On the basis of the personal identification number/business ID, the system retrieves the number of shares of the shareholder from the shareholders' register of the record date of the meeting created by Euroclear Finland Oy.

Innovatics Oy enters the information about the votes of holders of nominee registered shares.

## 7 Regular Disclosures of the Personal Data

A list of participants and a voting list and a summary list of votes cast will be created based on the information entered into the system, and the said lists will be attached to the minutes of the Annual General Meeting.

The shareholders' register is made available in the Annual General Meeting containing the name, municipality and details on ownership of all shareholders as at the record date of the Annual General Meeting. The register will also contain the information of holders of nominee registered shares who have temporarily registered into the shareholders' register for the Annual General Meeting.

## **8 Personal Data Transfers to Third Parties and Outside EU or European Economic Area**

Information may be made available to such parties who will participate in arranging the Annual General Meeting and need the information for such purpose. The data is not handed over to commercial purposes.

Personal data is primarily stored and processed within the European Union/European Economic Area, however, in certain cases personal data can be transferred outside in accordance with applicable data protection laws and regulations and subject to the restrictions set in said laws and regulations.

## **9 Protection of Personal Data**

Non-digital data is kept in a locked place and is available only for authorized persons.

Digital data is stored in a data center that meets the requirements for processing personal data. Data connection between the user's browser and the server is encrypted. Access to the system is limited to those employees of the data controller and its subcontractors who need and process the information for arranging the Annual General Meeting.

## **10 Retention and Deletion of the Personal Data**

Innovatics Oy stores the personal data for a period of up to one year after the Annual General Meeting. Euroclear Finland Oy stores the data for a maximum of four months.

The list of participants of the Annual General Meeting is stored permanently. It contains the participant's name, names of possible proxy representatives or assistants, number of shares and details relating to voting.

All other data is deleted, when they are not required for documenting the Annual General Meeting's minutes or checking for their accuracy.

## **11 Registrant's Rights**

Registrant has a right to know the data stored by the data controller about him/herself into the register. Registrant has also a right to request correcting, deleting or adding the data. The request should be addressed to the contact person mentioned in chapter 2 of this document.

Registrants have also the right to lodge a complaint with the Finnish Data Protection Authority ([www.tietosuoja.fi](http://www.tietosuoja.fi)), should they have concerns or remarks regarding the data processing described in this privacy statement.