

## HARTWALL CAPITAL'S PRIVACY POLICY PERTAINING TO PERSONAL DATA REGISTERS CONCERNING JOB APPLICANTS, CO-OPERATION PARTNERS AND PORTFOLIO COMPANIES

### Data controller

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### Contact person for register matters

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The personal data processed by Hartwall Capital are divided into the following registers:

1. Personal data register concerning job applicants
2. Personal data register concerning co-operation partners
3. Personal data register concerning portfolio companies
4. Shareholders' personal data register
5. Board members' personal data register
6. Employee personal data register
7. Access control register

The purpose of this privacy policy is to inform persons belonging to the personal data registers maintained in relation to job applicants, co-operation partners and Hartwall Capital portfolio companies mentioned under items 1 through 3 above of their statutory rights and to provide them with sufficient information regarding the processing of their personal data. The privacy policies for the personal data registers described under items 4 through 7 are maintained on the extranet portals serving the relevant group of persons and/or on the shared personnel cloud-based storage.

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## PRIVACY POLICY FOR THE JOB APPLICANT REGISTER

### 1. Legal basis and purpose of personal data processing

The processing of personal data is based upon:

- The data subject's consent to the processing of their personal data and/or
- Compliance with the obligations and special rights of the data controller and of the data subject in the sphere of employment law.

The purpose of the processing of personal data comprises measures pertaining to recruitment and management of the recruiting process, as well as management of the information pertaining to persons that have sought employment at Hartwall Capital (data subject) in order to enable the necessary contacting. The provision of personal data is a requirement for proceeding with the job application process.

## **2. Data content of the register**

The following personal data of the job applicant is processed in conjunction with the job applicant register:

- Basic information regarding the data subject, such as their name, date of birth, gender, native language;
- Data subject's contact details, such as their e-mail address, telephone number, address details;
- Information regarding the position applied for by the data subject, such as the details of the position being applied for, including details of the form and nature of the employment, along with details of the designated person responsible for the application process, salary request, information regarding commencement of employment. More detailed information is included in the job announcement;
- Information provided by the data subject to the data controller in connection with the job application process that is significant for eligibility, along with other information about the applicant themselves, their background, etc., such as photographs, information pertaining to education and other training-related information, profession, work history details (such as employers, times of commencement and durations of the employment relationships, as well as the nature of the work tasks), language skills, other special expertise, description of personal attributes, various diplomas and evaluations, as well as references to portfolios, profiles and other sources available on the Internet, along with references;
- Information concerning the progression of the data subject's recruitment process, such as details of an upcoming follow-up interview or the discontinuation of the recruitment process;
- Any other information that the data subject themselves have voluntarily provided in conjunction with the data controller's job application process or otherwise expressly published in a professional purpose, such as a LinkedIn profile.

## **3. Regular data sources**

The data source of the information to be recorded in the register is primarily the relevant job applicant. Other data sources are used within the framework stipulated for in the legislation. When necessary, Hartwall Capital also retains recruitment consultants.

By submitting a job application, the job applicant grants their permission to the collection of information from their public profile in the scope the collection of information is necessary and pertinent to work performance, taking into account the relevant open position.

## **4. Regular disclosures of information and transfer of data outside of the EU or the European Economic Area**

Personal data may be disclosed in the manner permitted and stipulated for by the valid legislation to parties that have a statutory and/or contractual right to obtain information from the register. Information may also be disclosed for other purposes in accordance with the laws

of Finland. In the processing of data, Hartwall Capital retains subcontractors working on behalf of the company in relation to the following services:

- HR and recruitment services
- Legal services
- IT system suppliers

Hartwall Capital has ensured the data security of the data subjects by means of concluding the requisite processing agreements with the subcontractors.

Information shall not be disclosed to any third parties other than the ones mentioned above, unless the data subject's consent for the disclosure has been separately requested and obtained.

Owing to the technical implementation of data processing, some of the information may be physically located on the servers or hardware of third-party subcontractors, from which they are processed with the aid of a technical interface. Personal data is not transferred outside of the EU or the EEA, unless it is necessary for reasons pertaining to the technical implementation of the service. Even then, Hartwall Capital shall ensure that the level of data protection is adequate, as required under the legislation.

## **5. Principles of protecting the register and data retention period**

Only those of Hartwall Capital's employees who by virtue of their work are entitled to process personal data information are entitled to utilise the system containing personal data. Each user has their own user ID and password to the system. The information is collected into databases protected by means of firewalls, passwords and other technical means. The databases and the back-up copies of same are located on locked premises and only certain pre-designated persons are able to access the information.

The information is retained for one year as of the expiration of the application period.

## **6. Rights of the data subject**

The data subjects have the right to inspect the information recorded about them in the personal data register and to demand the rectification or erasure of any erroneous, out-dated or unlawful information. To the extent the processing is based upon consent, the data subject also has the right to retract their consent or to modify same.

Pursuant to the General Data Protection Regulation (as of 25 May 2018), the data subject has the right to object to or to request a restriction of the processing of personal data, as well as to lodge a complaint regarding the processing of personal data to the supervisory authority.

On account of special personal circumstances, the data subject also has the right to object to processing measures related to them in cases when the processing of personal data is based upon a legitimate interest. The special circumstances underlying the objecting to the processing must be specified in connection with presenting the demand. Hartwall Capital may refuse to carry out the request concerning the objecting only upon grounds stipulated for in the legislation.

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## **PRIVACY POLICY FOR THE CO-OPERATION PARTNER REGISTER**

### **1. Legal basis and purpose of personal data processing**

- The legal basis for the processing of personal data is a legitimate interest on the basis of the customer relationship and/or for the implementation of an agreement.
- The purpose of use of the personal data is ordering assignments from co-operation partners and communications with same.

### **2. Data content of the register**

The register contains the following information regarding the decision-makers and contact persons of companies and associations:

- Name, position, company
- Postal address, e-mail address, telephone number

### **3. Regular data sources**

As a rule, the information for the register is collected from the data subjects themselves over the telephone, online, in meetings or in another comparable manner. Personal data may be collected and updated from publicly available data sources, such as companies' websites, the trade register as well as from other public and private registers.

### **4. Regular disclosures of information and transfer of data outside of the EU or the European Economic Area**

As a rule, Hartwall Capital does not disclose register information to third parties. Information may, however, be occasionally disclosed in accordance with the laws of Finland.

Owing to the technical implementation of the data processing, some of the information may be physically located on the **servers** or hardware of third-party subcontractors, from which they are processed with the aid of a technical interface. Personal data is not transferred outside of the EU or the EEA, unless it is necessary for reasons pertaining to the technical implementation of the service. Even then, Hartwall Capital shall ensure that the level of data protection is adequate in the manner stipulated for in the legislation.

### **5. Principles of protecting the register and data retention period**

Only those of Hartwall Capital's employees who by virtue of their work are entitled to process personal data information are entitled to use the system containing personal data. Each user has their own user ID and password to the system. The information is collected into databases protected by means of firewalls, passwords and other technical means. The databases and the back-up copies of same are located on locked premises and only certain pre-designated persons are able to access the information.

Personal data is retained for as long as necessary from the point of view of the purpose of use of the personal data, for instance for as long as assignments are carried out and for two years thereafter. Personal data is updated on a regular basis for the purposes of use described in this privacy policy, manually or through automated means.

## **6. Rights of the data subject**

The data subjects have the right to inspect the information recorded about them in the personal data register and to demand the rectification or erasure of any erroneous, out-dated or unlawful information. To the extent the processing is based upon consent, the data subject also has the right to retract their consent or to modify same.

Pursuant to the General Data Protection Regulation (as of 25 May 2018), the data subject has the right to object to or to request a restriction of the processing of personal data, as well as to lodge a complaint regarding the processing of personal data to the supervisory authority.

On account of special personal circumstances, the data subject also has the right to object to processing measures related to them in cases when the processing of personal data is based upon a legitimate interest. The special circumstances underlying the objecting to the processing must be specified in connection with presenting the demand. Hartwall Capital may refuse to carry out the request concerning the objecting only upon grounds stipulated for in the legislation.

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## **PRIVACY POLICY FOR THE ADMINISTRATION REGISTER PERTAINING TO INVESTMENT ACTIVITIES**

### **1. Legal basis and purpose of personal data processing**

The basis for the processing of personal data is the legitimate interest pertaining to the management and implementation of the rights and obligations related to the ownership of Hartwall Capital's portfolio companies. The purpose of personal data processing is the administration of ownership, communications with the decision-makers, co-owners and other key persons in the portfolio companies, as well as the organisation of the appointment processes for the members of the board of directors of the portfolio companies on the basis of separately granted consent.

### **2. Data content of the register**

The register contains the following information regarding the decision-makers, co-owners, board members and other key persons of companies and associations:

- Name, position, company, postal address, e-mail address, telephone number
- Company the operations of which the data subject is involved in
- Information provided by the data subject themselves (e.g. work tasks of the data subject)

and positions of trust)

- Any other information requisite from the point of view of the purpose of use of the register

### **3. Regular data sources**

As a rule, the information for the register is collected from the data subjects themselves over the telephone, online, in meetings or in another comparable manner. Personal data may be collected and updated from publicly available data sources, such as companies' websites, the trade register as well as from other public and private registers.

### **4. Regular disclosures of information and transfer of data outside of the EU or the European Economic Area**

As a rule, Hartwall Capital does not disclose register information to third parties. Information may, however, be occasionally disclosed in accordance with the laws of Finland.

Owing to the technical implementation of data processing, some of the information may be physically located on the servers or hardware of third-party subcontractors, from which they are processed with the aid of a technical interface. Personal data is not transferred outside of the EU or the EEA, unless it is necessary for reasons pertaining to the technical implementation of the service. Even then, Hartwall Capital shall ensure that the level of data protection is adequate in the manner stipulated for in the legislation.

### **5. Principles of protecting the register and data retention period**

Only those of Hartwall Capital's employees who by virtue of their work are entitled to process personal data information are entitled to use the system containing personal data. Each user has their own user ID and password to the system. The information is collected into databases protected by means of firewalls, passwords and other technical means. The databases and the back-up copies of same are located on locked premises and only certain pre-designated persons are able to access the information.

The personal data is retained for as long as the investment relationship remains in force, and thereafter they are erased or archived after ten years as of the termination of the investment relationship. Personal data is updated on a regular basis for the purposes of use described in this privacy policy, manually or through automated means.

### **6. Rights of the data subject**

The data subjects have the right to inspect the information recorded about them in the personal data register and to demand the rectification or erasure of any erroneous, out-dated or unlawful information. To the extent the processing is based upon consent, the data subject also has the right to retract their consent or to modify same.

Pursuant to the General Data Protection Regulation (as of 25 May 2018), the data subject has the right to object to or to request a restriction of the processing of personal data, as well as to lodge a complaint regarding the processing of personal data to the supervisory authority.

On account of special personal circumstances, the data subject also has the right to object to processing measures related to them in cases when the processing of personal data is based

upon a legitimate interest. The special circumstances underlying the objecting to the processing must be specified in connection with presenting the demand. Hartwall Capital may refuse to carry out the request concerning the objecting only upon grounds stipulated for in the legislation.