

# Privacy statement

This privacy statement describes the processing of personal data related to Optomed Plc's General Meeting.

Updated 9 April 2026

## 1. Controller and contact information

Optomed Plc (“**Optomed**”)  
Yrttipellontie 1  
90230 Oulu  
Finland  
[privacy@optomed.com](mailto:privacy@optomed.com)

## 2. The purpose and legal bases for processing personal data

The purpose of processing personal data is to enable carrying out the General Meeting of the controller in accordance with the law.

Personal data are processed only for the purposes necessary for the organisation of the General Meeting, such as to verify the identity of the registrant and their right to participate, preparing a list of participants, a list of votes and possible voting tickets, organizing any voting, and manage possible questions and requests to be heard.

The technical implementation of the registration system, General Meeting hall bookkeeping and possible advance voting and/or possible voting during the General Meeting is carried out by Innovatics Oy. The list of shareholders is maintained by Euroclear Finland Oy. Inderes Oyj is responsible for the General Meeting service in its entirety. In addition, other service providers are used when needed.

The processing of personal data described above is based on a legal obligation to which the controller is subject. The applicable legal obligation arises from the Finnish Limited Liability Companies Act (624/2006), which imposes requirements concerning the convening and conduct of general meetings of shareholders. Personal data in the form of log data and IP addresses are recorded for the purpose of technical maintenance and monitoring of the service. This processing is based on the legitimate interests of the controller. The legitimate interests pursued are ensuring the technical security, integrity and proper functioning of the General Meeting registration and voting service.

## 3. Processed personal data

The processed personal data include the shareholder's and their possible proxy's name, personal identity number and/or business ID, address, contact details, number of shares and votes, voting information, authentication method, basis of representation, date of registration, and possible information on aid, power of attorney, preliminary questions, and any additional information provided in connection with the registration. When

participating in the General Meeting, the time of arrival and departure of each participant are recorded. For technical maintenance and monitoring of the service, log data on registration and voting, as well as the user's IP address are also recorded.

The personal data processed includes the list of shareholders on the record date created by Euroclear Finland for the General Meeting, containing, e.g., the shareholder's name, personal identity number/business ID, address, and number of shares.

The personal data processed includes a temporary list of shareholders created by Euroclear Finland for the General Meeting, containing information on nominee registered shareholders registered for the General Meeting and their number of shares.

#### **4. Regular sources of data**

Personal data is collected from the shareholder themselves or from their representative in connection with the registration to the General Meeting. When registering via e-mail, mail or telephone, the controller or Innovatics Oy enters the registrant's personal data and advance votes into the register.

Based on the personal data provided in connection with the registration, Innovatics Oy retrieves the number of shares of the shareholder on the record date from the list of shareholders created by Euroclear Finland.

Innovatics Oy enters the voting instructions for nominee registered shareholders represented by account operators at the General Meeting into the register.

#### **5. Disclosures and transfers of personal data**

Based on the information in the register, a list of votes and a summary of the votes cast are established and attached to the minutes of the meeting. The list of votes contains information on the name of the shareholder and possible proxy and/or aid, number of the vote ticket (participant number), number of shares by share class, number of votes, basis of representation and means of attendance.

At the general meeting, in accordance with the Limited Liability Companies Act, the shareholder register is made available, which includes the names of shareholders, municipality, and the number of shares and votes according to the record date of the meeting. The list also contains information on nominee registered shareholders who are temporarily registered in the list of shareholders for the General Meeting.

#### **6. Transfer of data to third parties and outside the EU or the European Economic Area**

The personal data may be shared with third parties involved in organizing the General Meeting who need the data in their operations. Data is not disclosed for commercial purposes.

For recipients with Finnish phone numbers, text messages are sent via a Finnish service provider. For those with international numbers, text messages are sent using a Swiss service. The transfer of personal data to the Swiss service provider is made on the basis of the European Commission's adequacy decision recognizing Switzerland as providing an

adequate level of protection for personal data.

Otherwise, personal data is not transferred or disclosed outside the EU or the European Economic Area.

## **7. Basis for the protection of the personal data processing**

Physical material is stored in a locked room accessible only to persons entitled to the data.

Electronic material is stored in a data room that meets the requirements for the processing of personal data. The connection from the user's browser to the server is encrypted. Access to the personal data is limited to the employees of the controller and subcontractors who need and process data to organise the General Meeting.

## **8. Storage and deletion of personal data**

Innovatics Oy stores personal data for a maximum of two years after the end of the General Meeting.

Euroclear Finland Oy stores personal data for a maximum of four months after the end of the General Meeting.

The minutes of the General Meeting and the list of votes attached thereto are stored permanently. It includes the names of shareholders who participated in the General Meeting, the names of potential proxies and aids, the number of shares and votes, and the numbers of the voting tickets.

Other data is destroyed when it is no longer necessary to draw up the minutes or to verify their accuracy. Log data and IP addresses collected for technical maintenance and monitoring of the service are deleted when the data is no longer necessary for the maintenance and security purposes for which it was collected.

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

Data subjects have the following rights in relation to the processing of their personal data. Requests concerning these rights should be addressed in writing using the contact information set out in Section 1.

The data subject has the right to obtain confirmation of whether personal data concerning them is being processed, and to access that data.

The data subject has the right to request the rectification, deletion, or complementing of inaccurate or incomplete personal data concerning them.

The data subject has the right to request restriction of the processing of their personal data in certain circumstances, for example where the accuracy of the data is contested or where the data subject has objected to processing pending verification of whether the controller's legitimate grounds override those of the data subject.

Where personal data is processed on the basis of the controller's legitimate interests, the data subject has the right to object at any time to such processing on grounds relating to

their particular situation. The controller will cease such processing unless it can demonstrate compelling legitimate grounds which override the interests, rights and freedoms of the data subject or the processing is necessary for the establishment, exercise or defence of legal claims.

The provision of certain personal data is required by the Finnish Limited Liability Companies Act in connection with the exercise of shareholder rights at the General Meeting. Failure to provide the required data may result in the inability to register for or participate in the General Meeting or to exercise voting rights therein.

The data subject has the right to lodge a complaint with a supervisory authority, in particular in the Member State of their habitual residence, place of work or the place of the alleged infringement, if they consider that the processing of their personal data infringes the GDPR. In Finland, the competent authority is the Data Protection Ombudsman. Further information is available at <https://tietosuoja.fi/>.