

Oma Savings Bank Privacy Notice

General Meeting

1 General

OmaSp takes compliance with the EU General Data Protection Regulation and other legislation concerning the processing of personal data seriously. We ensure that personal data is processed securely and that our data protection practices allow data subjects to fully exercise their rights.

This Privacy Notice provides the information required by the EU General Data Protection Regulation and other applicable data protection legislation regarding the processing of personal data in connection with General Meetings of OmaSp.

OmaSp reserves the right to make changes to this Privacy Notice. This Privacy Notice was last updated on 15 October 2026.

2 Data controller

Oma Savings Bank Plc
Postal address: PL 77, 53101 Lappeenranta
Telephone: +358 207 640 600
Visiting address: Valtakatu 32, 53100 Lappeenranta
Website: omasp.fi

(Hereinafter “OmaSp” or “we”)

3 Contact details of Data Protection Officer

OmaSp Data Protection Officer
Postal address: PL 77, 53101 Lappeenranta
Email: tietosuoja@omasp.fi

4 Who does this Privacy Notice apply to?

This Privacy Notice applies to the following subjects:

- Shareholders of OmaSp
- Any representatives or assistants of shareholders of OmaSp

(Hereinafter the “data subject” or “you”)

5 What personal data do we process?

We process the types of personal data described in the table below.

Personal data category	Data included	Examples
Basic information	Identifying basic information	Name, address, contact details, date of birth, personal identity code or business ID
Participation and voting rights	Information on participation and voting rights, including information related to representation by another party	Book-entry account number, number of shares and votes, basis of representation, details of power of attorney
Registration	Information provided during registration	Authentication method, information about any assistant, advance questions, comments and other additional information provided during registration
Participation and voting	Information on participation in the General Meeting and, if necessary, information required to verify the accuracy of voting results	Time of arrival and departure, voting information
Technical management	Technical information needed to organise the general meeting and its preparatory arrangements, as well as for service maintenance and monitoring; technical details required to log in to the participation platform	Log data from registration and voting, IP address, and for the participation platform, shareholder or representative identifier and password code

6 For what purposes do we process personal data?

OmaSp processes personal data only for predefined purposes or for purposes compatible with them.

The purpose of processing shareholders' personal data is to enable registration for the General Meeting and to conduct the meeting efficiently and lawfully. This includes:

- Sending meeting notices and receiving registration
- Verifying identity and participation rights
- Preparing the list of participants, voting list and voting tickets
- Organising the voting process
- Managing advance questions and speaking requests

7 On what legal grounds do we process personal data?

Processing is based on OmaSp's legal obligations, particularly its obligation under the Finnish Limited Liability Companies Act (624/2006) to organise a general meeting. OmaSp is likewise obligated to prepare minutes and a voting list.

Providing the information requested in accordance with this Privacy Notice is a statutory requirement for participating in the General Meeting. Without this information, it is generally not possible to exercise share ownership-related rights.

8 Profiling and automated decision-making

Personal data is not used for profiling or automated decision-making.

9 How do we obtain your personal data?

We primarily collect personal data directly from the data subject themselves or from their representative. When registering electronically, the shareholder enters the information themselves. When registering via other methods, the shareholder provides the necessary information to our partner, Innovatics Oy, which manages registration for the General Meeting.

OmaSp may also use information it already holds, such as voting rights and shareholdings. Additional data may be collected from other lawful sources, for example by recording the shareholder's actions during the meeting (e.g. speaking turns).

10 Disclosure of personal data

Data may be disclosed to participants in the General Meeting, to other shareholders and to third parties in accordance with applicable legislation.

At the General Meeting, a list of shareholders is made available in accordance with the Limited Liability Companies Act. It includes the names, municipalities of residence, and share and vote counts of shareholders as of the record date. It also includes details of nominee-registered shareholders temporarily entered in the shareholder register for the purposes of the General Meeting.

Based on the data that is processed, a voting list and voting summaries are prepared and attached to the meeting minutes. The voting list includes the names of shareholders and any representative and/or assistant, voting ticket number (participant number), number of shares by class, number of votes, basis of representation and mode of participation.

In certain situations, applicable law may also require personal data to be disclosed to the authorities.

11 Transfer of personal data to data processors

Your personal data may be transferred to subcontractors and partners involved in organising the General Meeting who require the information to perform their duties. These parties are assigned by OmaSp to process personal data as a processor. As the data controller, we remain responsible for the personal data even after the transfer.

Our subcontractors and partners may only use personal data we have transferred in accordance with our instructions; they are not permitted to use the personal data for their own purposes. Through contracts and other arrangements, we ensure that all subcontractors and partners process the data carefully, lawfully and in compliance with good data processing practices.

Key subcontractors and partners involved in organising the General Meeting are:

- Inderes Oyj: responsible for the overall general meeting service
- Innovatics Oy: responsible for registration, keeping the minutes and technical implementation of voting
- Euroclear Nordics Oy: responsible for generating the list of shareholders on the record date and the temporary list of shareholders

12 Transfer of personal data outside the European Union or European Economic Area

OmaSp mainly processes personal data within the EEA (EU member states, Iceland, Liechtenstein and Norway). If we transfer personal data outside the EEA, we ensure adequate protection in accordance with legal requirements and using approved transfer mechanisms such as the European Commission's Standard Contractual Clauses.

Shareholders who register for the General Meeting will receive confirmation and reminders by text message. If a shareholder provides a non-Finnish phone number, the text message is sent via a Swiss service provider. The transfer to this provider is based on the decision by the European Commission regarding an adequate level of protection of personal data in Switzerland. Messages to Finnish numbers are sent through a Finnish provider.

If it's possible to use the right to speak virtually in the General Meeting, the right to speak will be enabled by a US service provider¹. The transfer to this provider is based on the decision by the European Commission regarding an adequate level of protection of personal data (EU-U.S. Data Privacy Framework). In this case, the aforementioned service provider processes the IP address and name of the person using the right to speak.

13 How do we protect your personal data?

OmaSp uses appropriate technical and organisational security measures to ensure that personal data is processed in way that is secure and in compliance with legal requirements. We also require that our subcontractors utilise appropriate and adequate protection measures when processing personal data.

14 What rights do you have as a data subject?

Under data protection legislation, you have the rights outlined in the table below. You may submit requests to exercise your rights at any OmaSp branch office or through our online bank.

¹ Read more about the service provider Daily, Co.'s data security and GDPR compliance: <https://www.daily.co/security/gdpr/> and <https://www.daily.co/products/security-at-daily/>. Daily, Co. acts as a subprocessor of Inderes Oyj.

Data subject's right	Description
Right of access	You have the right to access your personal data held by OmaSp. This right may, however, be restricted by law, the privacy of others, or the need to protect OmaSp's trade secrets.
Right to rectification	You may request correction, deletion or completion of inaccurate personal data unless restricted by law.
Right to restrict processing	If you have indicated that your data is inaccurate, you may request that processing be restricted while the matter is under review.
Right to request erasure	You have the right to demand the erasure of your data, for example, if you object to the processing of the data and there is no justified reason for continuing the processing or if the processing of the data is unlawful. However, OmaSp is in many cases obliged to store your personal data if the processing of the data is necessary to comply with legal obligations.

15 How long do we retain your personal data?

We retain your data only as long as necessary for the purposes defined in this Privacy Notice or for as long as we have a legal obligation to store that data. Thereafter, the data is deleted or anonymised.

- To comply with OmaSp's legal obligations, the minutes of General Meetings and attached voting lists are retained for the company's entire period of operation and for ten years after the end of the last financial year. They include the names of shareholders and any representatives/assistants, share and vote counts, and voting ticket numbers.
- Innovatics Oy retains personal data processed while organising the meeting for up to two years after the meeting to enable the verification of attendance records and vote counting.
- Euroclear Nordics Oy retains the list of shareholders on the record date and temporary list of shareholders for up to four months.

16 Complaints to the Data Protection Ombudsman

If you believe that your personal data is being processed unlawfully, you have the right to file a complaint with the Data Protection Ombudsman. Contact details are available at www.tietosuoja.fi.