

Privacy Statement

This privacy statement describes the processing of personal data related to the general meeting of Oma Savings Bank Plc.

Updated 12 November 2024

1. Data Controller and Contact Information for the Data Protection Officer

Oma Savings Bank Plc
Business ID: 2231936-2
Address Valtakatu 32, 53100 Lappeenranta
Representative: Data Protection Officer Riikka Luukko
Email: tietosuoja@omasp.fi / riikka.luukko@omasp.fi

2. Processors

The technical implementation of the registration system and the minutes of the general meeting, as well as any voting during the meeting, is carried out by Innovatics Ltd on behalf of Inderes Plc. The shareholder register is maintained by Euroclear Finland Ltd. These entities act as processors on behalf of Oma Savings Bank Plc. Inderes Plc is responsible for the overall general meeting service. Additionally, other service providers may be used as necessary, acting on behalf of or for Inderes Plc, such as Innovatics Ltd. Euroclear Finland Ltd is an independent entity.

You can read more about the processing of personal data by these entities on their websites.

3. Purpose and Legal Basis for Processing Personal Data

The purpose of processing this data is to enable the registration of shareholders of Oma Savings Bank Plc for the general meeting and to ensure the efficient and lawful conduct of the general meeting.

Personal data is processed solely for purposes necessary for organizing the general meeting, such as verifying the identity of the registrant and checking the right to participate, preparing the list of participants, voting list, and voting slips, organizing the voting, and managing advance questions and requests for speaking turns.

The processing of personal data is based on the statutory obligations of Oma Saving Bank Plc, particularly its obligation under the Companies Act (624/2006) to organize a general meeting. Oma Savings Bank Plc also has other statutory obligations that allow it to process personal data.

Providing this information is a statutory requirement for participating in the general meeting. Without this information, it is generally not possible to exercise the rights associated with the share.

The data is not used or disclosed for commercial purposes.

The processing does not involve automated decision-making.

4. Processed Personal Data

The personal data processed includes the name, address, contact details, date of birth, personal identification number or business ID, book-entry account number, number of shares and votes, voting information, method of identification, basis of representation, registration date, and any information about an assistant, power of attorney, advance questions and comments, and any other additional information provided during registration. For technical maintenance and monitoring of the service, log data on registration and voting, as well as the user's IP address, is also recorded.

The register includes the shareholder list formed by Euroclear Finland Ltd for the general meeting, which contains, among other things, the name, personal/business ID, address, and number of shares of the shareholder.

The register includes the temporary shareholder list formed by Euroclear Finland Ltd for the general meeting, which contains information on the registered nominee shareholders and their number of shares.

The arrival and departure times of participants at the meeting are also recorded. Oma Savings Bank Plc has the possibility to obtain the voting information of individual shareholders to verify the correctness of the voting result. Depending on the implementation of the general meeting and the arrangements preceding it, other technical information necessary for organizing and conducting the general meeting may also be processed.

5. Regular Sources of Information

The information is primarily obtained from the registrant or their representative. When registering via the internet, the shareholder enters their own information into the systems. When registering in other ways, the shareholder provides the necessary personal information for participation to Innovatics Ltd.

Oma Savings Bank Plc may use information it already holds about the shareholder, such as information about their number of votes and ownership, for organizing the general meeting. Additionally, information may be collected from other lawful sources, such as recording the shareholder's activities, such as speeches made during the general meeting.

6. Recipients of Personal Data

The information may be disclosed to participants in the general meeting, other shareholders, and third parties in accordance with applicable legislation. Based on the disclosed information, a voting list and summaries of the voting are formed, which are attached to the minutes of the meeting. The voting list includes the name of the shareholder and any representative and/or assistant, the number of the voting slip (participant number), the number of shares by type, the number of votes, the basis of representation, and the method of participation.

The shareholder list, which includes the name, municipality, and number of shares and votes of the shareholders as of the record date of the meeting, is kept available at the general meeting in accordance with the Companies Act. The list also includes the information of the registered nominee shareholders who have registered for the general meeting.

The information may be shared with third parties involved in organizing the general meeting and who need the information to perform their duties. In addition to Oma Savings Bank Plc, the personal data of registrants is processed by its designated partners, such as Inderes Plc and Innovatics Ltd acting on its behalf. Applicable law may also require the disclosure of personal data to authorities in certain situations.

7. Transfer of Data Outside the EU or the European Economic Area

Personal data is primarily processed only within the European Union and the European Economic Area. If transfers of personal data outside the European Union and the European Economic Area become necessary to fulfil the purpose of processing personal data, Oma Savings Bank Plc and its service providers, including Inderes Plc and Innovatics Ltd acting on its behalf, will ensure that the transfer is carried out lawfully and that the level of protection of the transferred data is adequate.

8. Retention and Deletion of Personal Data

Personal data is retained only as long as necessary to fulfill the defined purposes or in accordance with statutory retention periods. When the retention period for personal data has expired and there is no longer a basis for processing it within the limits allowed by data protection legislation, the personal data will be deleted.

Physical material is stored in a locked space accessible only to authorized persons.

Electronic material is stored in a data center that meets the requirements for processing personal data. The communication link from the user's browser to the server is encrypted. Access to the register is limited to a restricted group of employees of the data controller and subcontractors who need and process the data to organize the general meeting.

Innovatics Ltd retains personal data on behalf of Inderes Plc for up to two years after the end of the general meeting.

Euroclear Finland Ltd retains personal data for up to four months after the end of the general meeting.

To comply with the statutory obligations of Oma Savings Bank Plc, the minutes of the general meeting and the attached voting list are retained permanently. It includes the names of the shareholders who participated in the general meeting, the names of any representatives and assistants, the number of shares and votes, and the number of the voting slips.

9. Rights of the Data Subject

The data subject has the right to know whether their personal data is being processed. If the data is being processed, they have the right to access the information concerning them.

The data subject also has the right to request the correction of inaccurate and incorrect personal data concerning them.

The data subject has the right to request the deletion of data in certain cases and to a certain extent. Oma Savings Bank Plc is obliged by law to retain certain data permanently and therefore cannot delete this personal data despite the request. Additionally, the data subject has the right to request the restriction of data processing within the limits and in accordance with applicable data protection legislation.

Requests to exercise rights should be addressed to the contact person mentioned in this privacy statement. The request can be made informally to the contact details provided in section 1.

The data subject also has the right to lodge a complaint with the competent supervisory authority regarding the processing of their personal data if they believe that data protection legislation has not been complied with in the processing of their personal data. In Finland, the supervisory authority is the Data Protection Ombudsman (www.tietosuoja.fi)