



## Privacy Policy

---

This is a privacy policy to meet the obligation outlined in article 13 of the General Data Protection Regulation ((EU) 2016/679) to provide information to data subjects.

### Controller

eQ Plc (1625441-9) (hereinafter eQ) on its own behalf and on behalf of other companies within the same group  
Address: Aleksanterinkatu 19 A, 5. floor, FI-00100 Helsinki  
Telephone: +358 (0)9 6817 8777  
Website: [www.eQ.fi](http://www.eQ.fi)  
Contact person: Risk and compliance department  
E-mail: [eQCompliance\(at\)eQ.fi](mailto:eQCompliance(at)eQ.fi)

### Name of register

eQ Group's stakeholder register

### Purpose of and lawful basis for processing personal data

eQ processes personal data in its stakeholder register for cooperation and contact purposes. The processing of personal data is based on agreement, or when there is no contractual relationship, on eQ's legitimate interest, as set out in article 6 of the General Data Protection Regulation, to contact its stakeholders (e.g., investors, journalists, analysts, consultants, brokers, counterparts and other partners) and to cooperate with parties belonging to its interest groups. eQ does not use personal data for automated decision-making.

### Sources of personal data

eQ primarily obtains the data on its stakeholder register directly from the stakeholders. In addition, eQ obtains names and contact details from public and commonly available sources, such as the Internet.

### Transfer and disclosure of personal data

Data on the stakeholder register is disclosed to other companies in the eQ Group. Nasdaq Helsinki Ltd, which maintains lists of e-mails and press releases, and Eurolandcom Ab also have partial access to stakeholder register data pertaining to investor relationships. Parties responsible for the maintenance of information systems (currently Elisa Corporation and Model IT Ltd) also have partial access to the data on the stakeholder

register. These parties are bound by the same non-disclosure and other obligations as eQ.

### Transfer of personal data outside of the EU

eQ does not transfer data on its stakeholder register outside of the EU.

### Storing of personal data

eQ stores data on the stakeholder register for an indefinite period (as long as the data is useful) or until the data subject prohibits contact.

### Rights of the data subject

The data subject has the right to:

- access the personal data stored concerning him or her;
- rectify any inaccurate personal data concerning him or her;
- request the erasure of and have erased personal data concerning him or her;
- restrict the processing of personal data concerning him or her;
- object to the processing of personal data concerning him or her;
- transfer the personal data concerning him or her from one system to another; and
- prohibit the use of personal data concerning him or her in direct marketing and in certain other situations specified in the General Data Protection Regulation.

The data subject may send a free-form request relating to the exercising of his or her rights to eQ at the address given at the top of this privacy policy. If the data subject requests access to personal data concerning him or her, eQ will submit a copy of the personal data saved in the register either in written or electronic format, or specify a location where the data saved in the register is available to view without undue delay and, in any case, within one month from reception of the request. eQ may as necessary extend this period by a maximum of two months if the complexity and number of requests so requires. The data subject will be notified in such cases.

The data subject has the right to lodge a complaint with a supervisory authority, especially in that EU member



24 June 2020

state in which she or he has permanent residence or employment, or where the alleged breach of the Gen-

eral Data Protection Regulation has occurred. In Finland, the supervisory authority is the Data Protection Ombudsman.