

Privacy notice

This privacy notice describes the processing of personal data related to Annual General Meeting of Boreo Plc on 19 April 2023.

Data controller and contact details

Boreo Plc
Ansatie 5, 01740 Vantaa
Business ID: 0116173-8

Contact person:
Aku Rumpunen
aku.rumpunen@boreo.com

Name of the register

Boreo Plc's Annual General Meeting register.

Purpose and legal basis for processing data

The purpose of processing personal data is to enable the conduct of the controller's Annual General Meeting in compliance with the law. The processing of personal data includes the registration and voting of shareholders at the Annual General Meeting. The data is used to compile the meeting's attendance list, voting tickets and list of votes, voting as well as the management of requests to speak at the meeting.

Innovatics Oy is responsible for the technical implementation of the registration and advance voting system of the Annual General Meeting. The shareholders' register is maintained by Euroclear Finland Oy.

The processing of personal data is based on the controller's legal obligations.

Types of personal data processed

The following personal data is processed: the name of the shareholder and its possible proxy representative along with its date of birth/personal identification number and/or business identity number, address, contact details, number of shares and votes, voting information, method of identification, right to represent the shareholder, date of registration, possible information on the assistant and the power of attorney and any additional information potentially provided in connection with registration. In addition, the meeting participants' time of arrival and time of departure from the meeting will be recorded. Log data of the registration and voting and IP-address of the user will be processed for technical maintenance and monitoring of the service.

The register contains a shareholders' register on the record date, compiled by Euroclear Finland Oy. The register includes each shareholder's name, personal identification number or business identity number, address and the number of shares held.

The register also contains a temporary list of shareholders, compiled by Euroclear Finland, on nominee-registered shareholders who have registered for the Annual General Meeting and their number of shares held.

Regular sources of personal data

The shareholder's or its proxy representative's data will be collected primarily in connection with the registration. For data subjects who register by e-mail, post or telephone, the controller or Innovatics Oy will enter the data subject's personal data and advance votes in the register.

On the basis on the provided personal data the system retrieves information on the number of shares held by the shareholder from the list of shareholders on the record date of the Annual General Meeting, compiled by Euroclear Finland Oy.

Voting instructions for holders of nominee-registered represented at the Annual General Meeting by the account management organisation will be entered in the register by Innovatics Oy.

Disclosures of personal data

On the basis of the register data, the Annual General Meeting's list of participants will be compiled along with voting summaries, which will be appended to the minutes of the meeting.

At the Annual General Meeting, a shareholders' register will be displayed in accordance with the Finnish Companies Act. The register will contain the shareholders' names, municipalities of residence and their number of shares and votes at the record date. The register will also contain information on holders of nominee-registered shares who have been temporarily registered on the shareholders' register for the Annual General Meeting.

Transfer of personal data to third parties and outside EU/EEA

Personal data may be disclosed to third parties that participate in organising the Annual General Meeting and require access to the register data in their operations. The data shall not be disclosed for commercial purposes.

Text messages to the data subjects shall be sent via a Switzerland-based service. Other than that, no data shall be disclosed to or transferred to parties outside the EU or EEA.

Data security

Physical materials shall be stored in a locked space that can only be accessed by those who are authorised to access the data.

Electronic materials shall be stored in a data centre that meets the requirements set for the processing of personal data. Data connections from the user's browser to the server are encrypted. Access to the register shall be limited to a restricted group of employees of the controller and the controller's subcontractors who require access to the data for the purpose of organising the Annual General Meeting.

Retention and deletion of personal data

Innovatics Oy shall retain the personal data for at most one year after the end of the Annual General Meeting.

Euroclear Finland Oy shall retain the personal data for at most two months after the end of the Annual General Meeting.

The Annual General Meeting's list of participants shall be retained permanently. The list of participants contains the names of the shareholders who participated in the Annual General Meeting along with the names of any proxies, their number of shares and votes and their ballot numbers.

Other data shall be erased when it is no longer necessary for the purpose of drawing up the minutes of the meeting or verifying the accuracy of the information contained therein.

Data subject's rights

Data subjects have the right to be informed of what data has been recorded in the register concerning them. Data subjects have the right to request the rectification, erasure or amendment of data concerning them. Any requests should be directed to the aforementioned representative of the controller.

Data subjects have the right to lodge a complaint with the Data Protection Ombudsman if they have any grievances pertaining to the processing of data.