

Olvi plc; Description of file

1. General Information

Name of data file

File of managers, their closely associated persons and their transactions referred to in the Market Abuse Regulation (MAR EU 596/2014)

- Controller
 - Olvi plc (0170318-9)
 - Olvitie 1-4, 74100 Iisalmi, Finland
 - o Telephone +358 29 000 1050
 - o email mari.komulainen@olvi.fi
 - o contact Mari Komulainen
- Olvi plc is committed to compliance with the Finnish Personal Data Act, the Finnish Information Security
 Code and other applicable data protection legislation related to the privacy of data subjects, as well as to
 compliance with the best practices of personal data management and processing.
- "Personal data" refers to any information that may be used to identify an individual. In addition to personal data, we also collect non-personal data from which no individual persons can be identified.

2. Purposes of processing personal data

 The data is used for the purpose of compliance with and supervision of transactions conducted by managers and their closely associated persons as prescribed in Article 19 of the Market Abuse Regulation (EU 596/2014).

3. Contents of the data file

With regard to managers and their closely associated persons, the following data is registered: Name, position, personal identity number, the grounds for being considered a closely associated person, the starting date of status as a manager or closely associated person, contact information (telephone number, email and mailing address), as well as notifications of transactions received from the data subject and published by the company.

4. Sources of data

- The primary source of data is information provided by the manager and their closely associated persons.
- Public sources of data: Trade Register and the Business Information System YTJ, Nasdaq OMX Helsinki,
 Euroclear Finland Ltd, Financial Supervisory Authority

5. Disclosure of data

- Data can be disclosed to parties prescribed in the Market Abuse Regulation and any provisions issued by virtue of it, including but not limited to the Financial Supervisory Authority and the police.
- Data will not be disclosed to any third parties for the purposes of direct or other marketing.

6. Transfer of data to countries outside the EU or EEA

• No data will be transferred to countries outside the EU or EEA.

7. Protection of the data file

- Our data files are appropriately protected through technical and organisational measures. The system containing the data file can only be accessed by the assistant responsible for financial disclosures, the secretary of Olvi plc's Board of Directors and the Director responsible for insider issues.
- The personal data file is not processed manually.

8. Rights of the data subject

- The processing of personal data shall be in compliance with the personal data legislation valid from time to time.
- The data subject has the right of access to data on themselves in Olvi plc's personal data files.
- The data subject has the right to request that any incorrect personal data pertaining to themselves be rectified, erased or supplemented if the data is erroneous, unnecessary, incomplete or obsolete as regards the purpose of the processing.

9. Storage, archiving and disposal of the personal data file and its contents

- With regard to archiving and disposal, we comply with the requirements of personal data legislation valid from time to time.
- Contact information shall be removed from the file immediately after the grounds for being considered a closely associated person and/or insider have ceased to exist.

10. Monitoring arrangements, reporting of problems and deficiencies

• We shall report any potential information security threats or violations against the data file directly to the authorities or to the data subject in accordance with applicable legislation.