



Description of data protection: File of persons closely associated with Olvi plc

1. General

- Name of data file
 - **File of persons closely associated** in accordance with the Market Abuse Regulation (MAR EU 596/2014) and the International Accounting Standard IAS 24
- Controller
 - Olvi plc (Business ID 0170318-9)
 - Olvitie 1-4, 74100 Iisalmi, Finland
 - Telephone +358 29 000 1050
 - Contact person: Olvi plc financial management
 - Email: hallinto@olvi.fi
- Olvi plc is committed to compliance with the EU General Data Protection Regulation, the Finnish Data Protection 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 process 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 the Market Abuse Regulation (MAR EU 596/2014) and IAS 24.

3. Contents of the data file

- With regard to managers and their closely associated persons, the following data is registered: name, contact information, date of birth, position, the grounds for being considered a closely associated person, persons closely associated (spouse, dependents), entities in which the person exercises control or has influential power, transactions between Olvi and these entities and an estimate of their significance, the starting date of status as a closely associated person, the date of receiving the notification.

4. Sources of data

- The primary source of data is information provided by the data subjects themselves. The data is collected on a paper form from the persons themselves and stored in an Excel file based on the form. The data is also maintained in a separate register with Euroclear. Secondary sources of data are queries into Olvi plc’s information system and public sources:
- Trade Register and the Business Information System YTJ, Nasdaq OMX Helsinki, Euroclear Finland Ltd and the Financial Supervisory Authority.

5. Disclosure of data

- Personal data may only be disclosed for justified purposes in a manner compliant with requirements presented by competent authorities or other parties and based on legislation valid from time to time.
- Data will not be disclosed to any third parties for the purposes of direct or other marketing without the data subject’s consent.

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

- In general, no data will be transferred to countries outside the EU or EEA. If data is to be transferred to countries outside the EU or ETA, Olvi shall ensure a sufficient level of personal data protection through means such as making agreements on issues related to the confidentiality and processing of personal data as required by legislation, for example using standard contractual clauses approved by the European Commission, and otherwise in a manner ensuring that personal data is processed in accordance with this data protection policy.

7. Protection of the data file

- Access to the data file is only authorised for those Olvi plc employees who need the data in their duties. These are the Chief Financial Officer, Communications Assistant and Group Controllers.
- The paper forms are kept in a locked, fire-proof safe in the Communication Assistant's office.
- The Excel file is password protected and stored on the internal accounting server.
- Our data files are appropriately protected through technical and organisational measures. We shall also ensure the fault tolerance of our systems and means for restoring lost data.
- The files are maintained in appropriately protected servers and services. The protective measures include, among others, access control to systems and physical premises, firewalls and password protection that only allows Olvi plc employees to access the stored data.
- Access to personal data files is limited to those Olvi plc employees who have an appropriate need for such data (see above).

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

- We comply with the personal data legislation valid from time to time.
- All information on a data subject will be removed from Olvi's file at the end of the accounting period during which the data subject ceases to be a closely associated person. The date of termination of the closely associated status is recorded in the Euroclear register.

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.