

11.5.2021

PRIVACY POLICY – AC NETWORK AND BUSINESS CONTACTS

This privacy policy describes how we process the personal data of members of the AC Network (mainly management and board members of our investment and portfolio companies) and our business contacts. The entity acting as controller is the company you are interacting with, which is one of the three specified controllers below.

1 CONTROLLER

Controller	Ahlström Capital Oy (hereafter "Ahlström Capital" or "we")
Business ID	1670034-3
Address	Eteläesplanadi 14, 00131 Helsinki
Phone Number	+358 10 888 18

or

Controller	A. Ahlström Kiinteistöt Oy (hereafter "Ahlström Kiinteistöt" or "we")
Business ID	2566575-4
Address	Laviantie 22, 29600 Noormarkku
Phone Number	+358 10 888 18

or

Controller	Ahlstrom Capital B.V. (hereafter "Ahlstrom BV" or "we")
Business ID	34365843
Address	Heliconweg 52, 8914 AT Leeuwarden, the Netherlands
Phone Number	+31 6 15 30 84 91

2 LEGAL BASIS AND PURPOSE OF PROCESSING

Ahlström Capital, Ahlström Kiinteistöt and/or Ahlstrom BV may process your personal data for the purposes of communicating, developing, and maintaining the AC Network. The legal basis for the processing is to safeguard the legitimate interest pertaining to the administration and management of the rights and obligations related to ownership in our portfolio and investment companies.

We may process your personal data based on a customer relationship or co-operation initiative. The legal basis for processing the personal data is the legitimate interest pertaining to that relationship and/or the implementation of an agreement or assignment.

3 PERSONAL DATA COLLECTED

The personal data we process of you may include:

- identification information such as your name, address, e-mail and telephone number;
- company, position as well as other positions of trust; and
- other information that may be required for the purpose of the register, such as information regarding any dietary restrictions collected when you attend an event organized by us.

4 RETENTION PERIODS OF PERSONAL DATA

The personal data in each register is stored as long as it is necessary for the purpose it was collected for e.g. as long as you hold a position of trust in one of our portfolio or investment companies or for the duration of an assignment unless otherwise required by applicable law.

5 HOW DATA IS COLLECTED

In general, the data for the register is collected from the data subjects themselves per telephone, e-mail or another applicable manner. The data may also be collected from publicly available data sources such as companies' websites, the trade register as well as from other public or private registers.

6 DISCLOSE OR TRANSFER OF DATA

In general, the data is not transferred to third parties. Personal data may occasionally be transferred to third parties in accordance with the applicable laws and regulations, if processing activities have been outsourced to external service providers. In addition, personal data may be disclosed to companies within the Ahlström Capital Group as certain functions may be centralised for the group.

7 TRANSFER OF DATA OUTSIDE THE EU/EEA

The personal data is not transferred outside the European Union or the European Economic Area.

8 SECURITY MEASURES

The personal data is stored and processed only by designated persons who need to have access to the data for the purpose of their work. The purpose of these actions is to ensure the confidentiality of personal data, the availability and integrity of the data, and the exercise of the rights of data subjects.

9 RIGHTS OF THE DATA SUBJECT

As a data subject, you have certain rights under the General Data Protection Regulation 2016/679 (GDPR). Below are short descriptions of these rights.

Right to access: Data subjects have the right to receive confirmation from the controller on whether the controller is processing personal data that concerns them.

Right to rectification: Data subjects have the right to demand the rectification of inaccurate personal data concerning them and to have incomplete personal data completed.

Right to erasure: In certain cases, specified in Article 17 of the GDPR, the data subject has the right to have the controller erase data concerning them.

Right to restriction of processing: In certain cases, specified in Article 18 of the GDPR, the data subject can request the controller to restrict the processing of personal data concerning them.

Right to object: In certain situations, the data subject has the right to object to the processing of their personal data, that is, request the controller not to process it.

Right to data portability: The data subject has the right to receive the personal data that they have provided to a controller in a structured, commonly used, and machine-readable format and, if desired, transmit that data to another controller.

Right to withdraw consent: If personal data is processed based on consent, the data subject has the right to withdraw consent by informing the controller. Withdrawal of consent does not affect the lawfulness of the processing carried out prior to the withdrawal of consent.

Right to lodge a complaint with the supervisory authority: The data subject has the right to lodge a complaint with the competent

supervisory authority if the data subject considers that the controller has not complied with the applicable data protection regulation.

10 CONTACT INFORMATION AND THE USE OF DATA SUBJECT RIGHTS

In all matters relating to the processing of personal data and in situations involving the exercise of rights, the data subject should contact the controller's representative via e-mail at privacy@ahlstromcapital.com or by phone +358 10 888 18.