

**DNWP Privacy policy**  
**Shareholder communication register**  
**26.03.2025**

**1. Controller of the register**

Dedicated Network Partners Oy  
Valimotie 13 A  
FI-00380 Helsinki

**2. Contact information about the register**

privacy@dnwpartners.com

**3. Register name**

Shareholder communication register

**4. Purpose of collection of personal data**

Shareholder communication management.

**5. Register information content**

- Name
- Postal address
- E-mail address
- Telephone number

**6. Data retention time**

Personal data is only stored for as long as necessary to fulfill the purposes specified in this privacy policy and in accordance with the statutory retention periods.

**7. Regular sources of information**

Information is collected from shareholders themselves via a request for additional information.

## **8. Regular transfers and handing over of information and transfer of information outside the EU and the European Economic Area (EEA)**

Gathered information is used for shareholder communication purposes only.

In some cases, we may use the services of service providers to gather information.

In these cases personal data is shared with third parties (service providers) and it's ensured that the gathered information is not transferred outside the EU and the EEA.

In some cases it is obligated by mandatory law to disclose personal data to certain authorities or other third parties, for example, to police in case of suspected crime.

The information in the register is maintained and processed only in Finland.

## **9. Register data protection principles**

Personal data is collected by electrical methods/tools. The register data is stored electronically and the communication connections required for its use are SSL encrypted.

The register is located in premises protected by access control and use of the register is limited by user authorizations (username and password).

Only personnel specifically authorized to the company's shareholder information are authorized to access it.

## **10. Automated decision-making**

Automated individual decision-making, like profiling, is not used.

## **11. Registered rights**

According the EU GDPR Regulation the registered has the right to inspect what personal information relating to him has been deposited in the Register. These requests, related to this register, can be done via email address:

[privacy@dnwpartners.com](mailto:privacy@dnwpartners.com)

The right of inspection is free of charge at most once a year.

Additionally, the registered have the followed rights:

- Right to claim rectification or removal of incorrect or obsolete personal data (Articles 16 and 17)
- Right to claim transfer of personal data from one system to another (Article 20)
- Right to limit the processing of his / her personal data (Article 18)

One important right is that the registered has right to object to the processing of his / her personal data (Article 21).

This means that the controller shall no longer process the personal data unless the controller demonstrates compelling

legitimate grounds for the processing which override the interests, rights and freedoms of the registered or for the establishment, exercise or defense of legal claims.

For example, if personal data is processed for direct marketing purposes, the registered has the right at any time to object to processing of personal data relating to such marketing.

The registered has also the right to withdraw his / her prior consent to the processing of data (Article 7) or to file complaints with the supervisory authority on the processing of his / her personal data (Article 77).

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DNWP is constantly developing its business and therefore reserves the right to change this privacy policy.

The information may be subject to changes from time to time due to I e. technical reasons and/or changes in our service providers, applicable legislation and legal interpretations.