

**DNWP Privacy policy  
Shareholder register  
25.03.2025**

**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 register

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

Personal data is collected and processed on the basis of Article 6.1, point c, of the GDPR, as the controller is obliged to maintain a register of shareholders under the Finnish Companies Act.

**5. Register information content**

- Shareholder name
- Shareholder postal address
- Number of individual shares (or share certificates) by share class
- Date of issue of shares

**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 in the register through share acquisition notifications made by shareholders.

## **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 to fulfill the obligations specified in the Finnish Companies Act.

The shareholder register data is public in accordance with the Finnish Companies Act.

It is available to everyone at the company's head office. Any person is entitled to see the shareholder register without a separate application.

In addition, everyone has the right, after reimbursing the company's expenses, to receive a copy of the shareholder register or part of it.

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

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

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 to 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 following 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 the 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.