

DESCRIPTION OF THE FILE and data processing protection policies

Date of drafting: 25.5.2018

<p>1. Processor (the data Controller is the EAM client company)</p>	<p>Name Evli Awards Management Oy ("EAM", FI18824913)</p> <hr/> <p>Contact information Aleksanterinkatu 19 A FI-00100 Helsinki Tel. +358 (0)9 476 690</p>
<p>2. The person in charge and/or contact person</p>	<p>Name Client data: Pertti Helaniemi, Managing Director Data protection officer: Risto Sundquist, CISO</p> <hr/> <p>Contact information Aleksanterinkatu 19 A FI-00100 Helsinki Tel. +358 (0)9 4766 90</p>
<p>3. Name of the register</p>	<p>Administration and participant register for share-based incentive plans of client companies ("Incentive-portal")</p>
<p>4. The purpose for processing the personal data / the purpose for the use of a register</p>	<p>To manage the outsourced administration tasks of share-based incentives plans of client companies and assist in carrying out the relating employer obligations as well as to receive and forward client company employees' (data subjects) option and/ or share transactions and / or subscriptions.</p> <p>The file can be used for direct marketing purposes if the persons participating in the client companies' share-based incentives have given their express permission.</p> <p>Legal grounds for processing personal data:</p> <ul style="list-style-type: none">- Fulfilling the obligations set forth in the administration agreement of the share plans between the client company (data controller) and EAM. (GDPR/ article 6/1.b)- Consent given by the individual data subject at first log-in (login-disclaimer). (GDPR/ article 6/1.b)- Carrying out obligations stipulated by law or authoritative regulation (employer related obligations). (GDPR/ article 6/1.c)
<p>5. Content of the register</p>	<p>Persons who have/had an employment or service contract to EAM's client company and/or are eligible participants in the company's equity incentive plans.</p> <p>The file contains data on the data subjects including identification data (e.g. social security number, date of birth), basic personal data, contact data, and employment data (e.g. employer company, taxation country, reason for termination, salary), book-entry and bank account information (e.g. payroll bank account, ownership data and transactions), information about the Company's share-based incentive plans and other possible information that is requested by the client company.</p>

	<p>For data subjects that open accounts in Evli Bank Plc also legally required Fatca-, CRS-, MiFid- and KYC-related data (e.g. TIN-numbers, taxation information and personnel ID's) is gathered, maintained and transferred to Evli Bank Plc.</p> <p>For those client companies that use the Euroclear's Extranet service, the file includes information regarding option and/or share transactions and ownerships in other book-entry operators' custody.</p> <p>For option and share transactions transferred to and executed by Evli Bank Plc, the execution data and price information are received real-time. Also incentive plan related book-entry account and bank account balances are received from Evli.</p>
<p>6. Regular sources of information</p>	<p>Client companies, as employers, provide basic data regarding their share-based incentives as well as the persons who have/had an employment or service contract to the company. The basis and terms for data processing are described and agreed upon in the agreement between the client company (data controller) and EAM (data processor) (Data Protection Agreement).</p> <p>Information given by the data subjects.</p> <p>Euroclear's Extranet service.</p> <p>Evli Bank Plc client register and trading as well as depository system.</p>
<p>7. Regular destinations of disclosed data and</p>	<p>The taxable benefits are reported (monthly) to the tax authorities and/or client companies in order for them to carry out employer obligations.</p> <p>The data subjects enter into a separate client agreement with Evli Bank Plc and authorize account entries.</p> <p>The option and share sale and / or subscription orders are transferred to Evli Bank Plc for execution.</p>
<p>8. Whether the data is transferred to countries outside the European Union or the European Economic Area</p>	<p>Data can be transferred outside member states only on the grounds permitted by the Personal Data Act and with separate request from the client company.</p> <p>All data in the incentive participant register (Incentive) is maintained within the EU/ETA region.</p>
<p>9. The principles how the data file/register is secured.</p>	<p>A. Manual register (place of storage and the methods of protection)</p> <p>No manual data of the portal system is maintained as such. Regarding other manual data;</p> <ul style="list-style-type: none"> - Prescribed by law as confidential. All the people who process data are subject to a statutory professional secrecy obligation and/or non-disclosure agreement. - The data is kept in locked premises. - Access control in all premises where data is kept. <p>B. Data register/ADP register (principles for the right to use a register, monitoring of the use and actual protection of hardware)</p> <p>The data is prescribed by law as confidential. All the people who process data are subject to a statutory professional secrecy obligation and/or non-disclosure agreement.</p> <p>Access to the data file is restricted by right of use and right of maintenance. The file is protected by an outside hosting-service provider and the access and use requires a</p>

	<p>user name, password, and a random generated authentication code. For administrators also an IP address restriction is used. All data communication is TLS-protected. Access control is in all premises where there is unlimited access to the data. The data in the register is backed up and use is monitored regularly.</p> <p>Data transfer to and from the data controllers is encrypted either by secure file transfer (STP/TLS) and/or secure email (SecureMail). Unencrypted transfers can be used only by specific request by the data controller.</p> <p>Data transfer to and from the data subjects is usually conducted through the Incentive portal, which is secured by TLS, and accessed using personal user codes. Data can also be transmitted via secure email (SecureMail). Unencrypted transfers can be used only by specific request by the data subject.</p>
<p>10. Right to access personal Data</p>	<p>The data subjects have a right to access their own data.</p> <p>The data subjects have the opportunity to independently inspect and partly correct their data through the Incentive online service, where the majority of personal data is available and accessible with personal user codes.</p> <p>Requests regarding the right of inspection of other personal data, not available on-line (mainly consisting of employment related data), must be presented in writing to the register's contact persons. The client is identified before the right is fulfilled.</p> <p>Unfounded or repeated data access requests will be billed according to the prevailing price list.</p>
<p>11. Right of inspection and right to require correction of data</p>	<p>The data subjects have a right to rectify their own data.</p> <p>The rectification of personal data, not available in the on-line portal, can be requested in writing to the register's contact persons. The client is identified before the right is fulfilled.</p>
<p>12. Other rights related to the processing of personal data:</p>	<p>For further information on use of personal data please see: https://www.evli.com/en/footer/use-of-personal-data.html</p>