

## Description of Data Processing regarding shareholders register

<b>Controller</b>	Haltian Oy ("Haltian")  Yrttpellontie 1D 90230 Oulu Finland
<b>Contact Information</b>	privacy@haltian.com
<b>Categories of personal data and data subjects</b>	<p><b>Categories of Personal Data.</b> We process personal data provided by you or collected from publicly available sources:</p> <ul style="list-style-type: none"> <li>• <b>Basic Information</b>, such as name, identification information and contact information</li> <li>• <b>Payment information</b></li> <li>• <b>Share information</b>, such as number of shares</li> <li>• <b>Inquiries</b>, such as information related to communication</li> <li>• <b>Shareholder agreement related information</b></li> </ul> <p><b>The categories of data subjects</b> are the following:</p> <ul style="list-style-type: none"> <li>• <b>Shareholders of Haltian</b></li> </ul>
<b>The legal basis and purposes of the processing</b>	<p><b>Legal basis.</b></p> <p><b>Legal Obligation.</b> Processing is necessary for the purposes of maintaining the shareholder register under limited liability companies act.</p> <p><b>Agreement.</b> Moreover, personal data is processed to fulfil the contractual obligations related shareholders. This requires us to process your data for the partner relationship management and communication.</p> <p><b>Legitimate Interest.</b> We process your personal data for the following purposes based on legitimate interests pursued by us:</p> <ul style="list-style-type: none"> <li>• <b>Information and security purposes</b>, including detecting or preventing various types of misuse of services and fraud.</li> <li>• <b>Electronic Direct Marketing and communication via email.</b> We may send you electronic direct marketing, such as newsletters, promotions about new products as well as information about user surveys and trials, by email. You can opt-out such electronic direct marketing or communication at any time free of charge by clicking on the "unsubscribe" link included in our newsletters, adjusting the settings of your user account, or by contacting us directly.</li> </ul> <p><b>Purposes of the Processing.</b></p> <ul style="list-style-type: none"> <li>• <b>To maintain shareholder register</b></li> <li>• <b>To fulfil shareholder agreement obligations</b></li> <li>• <b>For information and security purposes</b></li> <li>• <b>Electronic direct marketing and communication purposes</b></li> </ul>

<p><b>Sharing of personal data</b></p>	<ul style="list-style-type: none"> <li>- <b>Our third-party vendors</b>, who provide us with cloud-based IT and business support as well as customer care services, may need to process your information. All such third parties are operating under contract and acting on behalf of us.</li> <li>- <b>Competent authorities</b>. When required in response to a legal process or request from a competent authority according to applicable laws or in connection with a legal proceeding or process.</li> <li>- <b>Mergers, acquisitions, or sale of assets</b>. When required as part of a merger, acquisition, sale of assets (such as service agreements) or transition of service to a group entity or another company.</li> </ul>
<p><b>International Transfers</b></p>	<p>When transferring and disclosing your data outside the EU/EEA in above mentioned situations, where the local law may not provide the same level of protection, we comply with applicable legal requirements for providing adequate safeguards to such transfer by e.g. using the European Commission's Standard Contractual Clauses (SCC).</p>