

Pohjan Voima Ltd. privacy statement for stakeholders and landowner register

1. General

Pohjan Voima Ltd. and its subsidiaries (hereafter “the Company” or “We/Us”) commits to ensure the confidentiality and privacy protection of the personal data in its possession. This privacy statement is applicable to the personal data that we collect for the purposes of our stakeholder and landowner register (hereafter “Register”). This privacy statement describes the personal data we collect and how it is processed. Further information on the processing of personal data can be provided by contacting Juho Rönni, juho.ronni@pohjanvoima.fi

We reserve the right to update this privacy statement from time to time, for example, if there are changes in legislation. We will attempt to use reasonable means to inform you ahead of time of any possible changes and their effects. We encourage you to review this privacy statement whenever you receive information on any changes concerning it. This privacy statement was last updated on 30.11.2022.

2. Contact information for the Registrar

Name: Pohjan Voima Ltd.

Address: Keilaranta 16, 02150 Espoo

Phone: +358 40 824 8780

Business ID: 3004732-8

3. Whose personal data do we collect?

In the Register, we process the personal data of relevant representatives of our stakeholders, property owners, property residents, tenants and farmers as well as their possible guardians or contact persons (hereafter together “landowners”) and visitors to the Company’s website.

4. What kind of personal data do we collect?

We collect the following personal data relating to the representatives of our stakeholders or potential stakeholders:

- name;
- contact details: email and phone number;
- the company you represent, the company’s contact details and the position of the representative in the company;
- the representative’s credentials/usernames in social media services;
- invoicing information; and
- information concerning the use of electronic services and content (e.g. signing up for newsletters).

We collect the following personal data concerning landowners:

- name;
- contact details: address, email, phone number;
- data relating to landownership and properties (e.g. data concerning land leasing or other contracts made with landowners, data entered into the cadastral system, certificates of easement as well as data on possible tenants and/or farmers);
- invoicing information; and
- other details relating to the contract or contractual relations.

We collect personal data concerning web visitors (representatives of stakeholders and landowners can also be web visitors):

- technical data sent by your browser to our servers (e.g. IP address, browser, browser version, the webpage you left to come to our website); and
- cookies sent to your browser and data concerning them (more information on cookies and similar technology can be found in section 12)

5. From which sources do we collect personal data?

In the first instance, we collect personal data that has been registered by the individual (e.g. when you send a contact form or a business card given to us). We also collect personal data from the following sources:

- contracts that you have made with Us or our subsidiaries;
- customers and our partners;
- National Land Survey Finland; and
- other public sources.

6. Basis for processing personal data, intended use and effects

The basis for the processing of your personal data is our **legitimate interest** based on the below-mentioned purposes of use for the representatives of our stakeholders and our potential landowner cooperation partners, the **execution of the agreement** for landowners or stakeholders who have entered into a land lease or other agreement with us, and **processing based on the law** regarding redemption procedures.

The purpose of processing personal data is, in the case of representatives of our stakeholders, specifically managing and maintaining stakeholder relations.

Regarding landowners, the purpose of processing personal data is to contact landowners located in the area of potential wind farms in order to conclude land lease agreements and to prepare, register, and execute land lease and other applicable agreements, as well as in some situations to carry out the redemption procedure in accordance with the Act on the Redemption of Immovable Property and Special Rights (603/1977). The effects of our processing of personal data are limited to contacting landowners, concluding possible agreements, implementing concluded agreements and implementing the redemption procedure.

Regarding our website visitors, the basis for processing your personal data is our **legitimate interest**, and in the case of cookies, **your consent** to their use. The purpose of processing the personal data of website visitors is to target our services, ensure data security and collect statistical data of website visitors.

7. Regular transfers and transfers of your personal data to third parties

We can transfer your personal data to third parties as part of Pohjan Voima Group's project development and contact with landowners/stakeholders. In this sense, the potential recipients of the data are, for example, municipalities, subcontractors and officials. We also transfer your personal data to the National Land Survey Finland, for example, for the registration of land lease agreements or as part of the redemption procedure.

In addition, we can transfer your personal data for processing on behalf of our Company to other service providers to carry out the processing of the personal data. Currently, our partners are:

- Microsoft (O365-system and electronic archiving related to it)
- Subcontractors carrying out land leasing activities
- EIA and planning consultants and subcontractors carrying out environmental surveys

It may also be necessary for us to otherwise share your personal data with competent authorities in accordance with the legislation on the processing of personal data.

8. The transfer of your personal data outside the EU or EEA

Your personal data may be transferred outside the European Union or European Economic Area to the following entities in accordance with the legislation on the processing of personal data:

- to provide Microsoft O365-system services (including electronic archiving).

In all instances, we only transfer your personal data outside the European Union or European Economic Area on one of the below-mentioned legal grounds:

- the European Commission has decided that the recipient country in question has an adequate level of data protection;
- we have implemented appropriate safeguards for the transfer of your personal data using standard data protection clauses approved by the European Commission. You then have the right to receive a copy of the standard clauses in question by contacting us as described in the Contact section; or
- you have given your explicit consent for the transfer of your personal data, or there is another legal basis for transferring your personal data outside the EU or the European Economic Area.

9. Principles for storing personal data

We store your personal data in the Register according to the following principles:

- Personal data concerning wind farm projects and solar farm projects are stored for the duration of the project. For potential wind farm projects, personal data is stored for the duration of the project assessment and is immediately deleted if the project is canceled or ended.
- With regard to concluded agreements, such as land lease agreements, personal data is stored as

long as the land lease agreement is valid or the execution of the agreement requires it (e.g. if necessary for possible restoration measures).

– Personal data related to the redemption procedure is deleted after the redemption procedure and any related appeals process have ended, unless personal data is needed to carry out the actions performed based on the redemption procedure (e.g. compensation payments and making entries in the real estate register).

10. Registrant's right to object and other rights related to the processing of personal data

In accordance with applicable data protection legislation, you have the right at any time to:

- receive information on the processing of your personal data;
- receive access to your own information and check the personal data on you that we process;
- demand the correction and completion of unclear and incorrect personal data;
- demand your personal data to be deleted;
- withdraw your consent and object to the processing of your personal data to the extent that the processing of your personal data is based on your consent;
- object to the processing of your personal data on grounds related to your personal special situation to the extent that the basis for processing your personal data is our legitimate interest;
- receive your personal data in a machine-readable format and transfer the data in question to another registrar, provided that you have provided the data in question to us yourself.
- we process the personal data in question based on the contract or your consent and the processing is carried out automatically; and
- demand the restriction of the processing of your personal data.

If you withdraw your consent, it does not affect the legality of your personal data processing carried out before your withdrawal of consent. You can withdraw your consent via the Contact section below.

Your request regarding the above-mentioned right to withdraw consent should be submitted to us according to the Contact section of this privacy statement. We can ask you to specify your request in writing and verify your identity before processing the request. We may refuse to fulfill your request on the grounds set out in applicable law.

You also always have the right to make a complaint with the relevant supervisory authority or the supervisory authority of the EU member state where you live or work, if you believe that we have not processed your personal data in accordance with the applicable data protection legislation.

11. Registry protection principles

We respect the confidentiality of your personal data. Digitally processed personal data is protected and stored in our information system, access to which is limited to those persons who require the data in question in order to carry out their work tasks. The persons in question use private usernames and passwords. When information in the register is processed on an internet server, the physical and digital data security of the equipment is carried out in an appropriate manner.

12. Information about cookies and similar technology

A "cookie" is a commonly used small text file that an internet browser stores on your computer or other device when you visit a website. The browser sends information about your visit back to the website when you visit it again. All modern websites use cookies to provide you with a more personalized browsing experience.

Each cookie is set separately for each of your devices and cookies can only be read on the server where the cookie is set. Since the cookie is tied to the browser, and basically cannot be shared between different browsers or devices (unless a browser, add-on or other application separately enables this), the choices you make to manage cookies are basically only applicable to the individual browser in question. The cookie cannot run software, and it cannot be used to deliver viruses or other harmful code, nor can it damage your device or files. An individual user cannot be identified solely through the use of a cookie or similar technologies.

13. Contact

All requests about the use of the above-mentioned rights, questions about this privacy statement and other contact requests should be sent via email to juho.ronni@pohjanvoima.fi. You can also contact us in person at our offices or in writing at the following address:

Pohjan Voima Ltd.

Juho Rönni

Keilaranta 16, 02150 Espoo

If you would like to withdraw your consent for the use of cookies, you can do so by clicking the cookie banner.