

INFORMATION NOTICE

General Data Protection Regulation (2016/679), Articles 13 and 14

Date: February 24th, 2025

We may update or revise this Information Notice at any time, with any notice to you as may be required under applicable law.

1. Controller / Company	Orion Corporation Orionintie 1 02200 Espoo Finland Tel. +358 10 4261
2. The person in charge / contact person	Contact person of the register: Head of Legal Affairs Mikko Kemppainen Orion Corporation Orionintie 1A 02200 Espoo Tel. +358 10 426 4953 e-mail: mikko.kemppainen@orion.fi Contact details of the Data Protection Officer: privacy@orion.fi
3. Name of the data file	Annual General Meeting Register of Orion Corporation
4. The purpose for processing the personal data / recipients (or categories of recipients) of personal data / the legal basis for processing the personal data	<p>The purpose of this register is to enable registration for and participation in the Annual General Meeting of Orion Corporation, advance voting and following the Annual General Meeting via webcast.</p> <p>The enabling of the registrations for and participation in the Annual General Meeting, advance voting and following the meeting via webcast requires the collection and processing of personal data in order for the shareholder to be able to identify themselves and for Orion Corporation to be able to identify the shareholder's shareholding and right to take the above actions.</p> <p>The service provider of the AGM registration and advance voting service and of the technical implementation of the Annual General Meeting is Innovatics Ltd, the service provider for the service making it possible to follow the Annual General Meeting via webcast is Flik Helsinki Oy, and Inderes Oyj is responsible for the Annual General Meeting service in its entirety. The foregoing companies will receive personal data in connection with providing the services. In addition, other service providers may be used when needed, and may receive personal data in connection with providing services. The shareholder register and the temporary shareholder list are maintained by Euroclear Finland Oy.</p> <p>Information contained in the register may also be shared with other third parties assisting in the performance of technical operations, such as data storage and hosting.</p> <p>The collected data will not be disclosed to third parties for commercial purposes.</p> <p>The legal basis for processing of the personal data is the fulfilment of the controller's obligations based on binding law (Finnish Companies Act (624/2006), Chapter 5, Sections 3, 6, 7, 8 and 16).</p>

	<p>Notwithstanding the foregoing, the legal basis for the processing of the personal data in connection with and relating to following the Annual General Meeting via webcast is the legitimate interest of the controller (EU General Data Protection Regulation, Article 6.1f) to identify the shareholders entitled to follow the Annual General Meeting to be able to offer them the opportunity to follow the Annual General Meeting via webcast. Only shareholders of Orion Corporation who are on the record date of the Annual General Meeting registered in the company's shareholder register have the right to follow the Annual General Meeting via webcast, so therefore the identification of the shareholder is necessary.</p> <p>We only process personal data based on our legitimate interest in case we have based on the weighing of interest carried out by us concluded that the rights and freedoms of the data subjects do not override our legitimate interest.</p>
<p>5. Content of the data file</p>	<p>Innovatics Ltd operates as the service provider for the collection of the AGM registrations and advance votes and for the technical implementation of the Annual General Meeting. Innovatics Ltd may collect, inter alia, the following data: name, date of birth/personal identification number, address, phone number, e-mail address, number of shares and votes held, voting information, registration date, method of identification, basis for representation, information on possible assistant or power of attorney as well as any other information given in connection with the registration. Log data of the registration and advance voting as well as the user's IP address will also be recorded for the purposes of technical maintenance and monitoring of the service. The register includes the company's shareholder register maintained by Euroclear Finland Oy as at the record date of the Annual General Meeting, containing, inter alia, the shareholder's name, personal identification number/business ID, address, and number of shares, as well as the temporary shareholder list created by Euroclear Finland for the Annual General Meeting, containing information on the nominee registered shareholders registered for the Annual General Meeting and their shareholding.</p> <p>Flik Helsinki Oy is the service provider for the service making it possible to follow the Annual General Meeting via webcast. Flik Helsinki Oy may process the following data: identification and contact details (inter alia, name, e-mail address), classifying information (inter alia, contact language), user information (user id and password) as well as log data of logins to the webcast and of the use of the webcast.</p>
<p>6. Source of information</p>	<p>When registering for and participating in the Annual General Meeting, voting in advance and registering to follow the Annual General Meeting via webcast, the person provides data about themselves either directly or via his/her proxy representative. Innovatics Ltd cross-checks the identification details against the shareholder register of Orion Corporation maintained by Euroclear Finland Oy, from which the ownership information is extracted. When giving an authorization, the person also provides the necessary personal data of the proxy representative. Innovatics Ltd enters into the register the voting instructions delivered by depository participants for nominee registered shareholders.</p> <p>The necessary identification details will be passed on to Flik Helsinki Oy to enable following the Annual General Meeting via webcast.</p>
<p>7. Transfers of personal data to countries outside the European Union or the European Economic</p>	<p>Text messages relating to the Annual General Meeting will be sent via a Swiss service. The European Commission has adopted a decision on the adequacy of the protection of personal data in Switzerland. Personal data is not otherwise transferred to countries outside the European Union or the European Economic Area.</p>

Area	
<p>8. The principles how the data file / register is secured</p>	<p>A. Manual register</p> <p>The manual data shall be stored in an area with restricted access, available only for the authorized persons.</p> <p>B. Electronically stored information</p> <p>Innovatics Ltd is responsible for the maintenance of the register concerning the AGM registrations, participation information and advance voting. The connection from a user's browser to the server of Innovatics Ltd is encrypted. Technical data protection is being used in the application, by which the entered information shall remain unchanged and is available only for the authorized persons.</p> <p>Flik Helsinki Oy is responsible for the maintenance of the register concerning following the Annual General Meeting via webcast. The connection from a user's browser to the server used by Flik Helsinki Oy is encrypted. Technical data protection is being used in the application, by which the entered information shall remain unchanged and is available only for the authorized persons.</p>
<p>9. Retention period of the personal data</p>	<p>The personal data included in the Minutes of the Annual General Meeting or its Appendices shall be retained by the controller as part of the Minutes for a period determined by Companies Act, at least for the duration the company is in operation.</p> <p>Innovatics Ltd retains on the behalf of the controller the personal data of persons registered for the Annual General Meeting up to a maximum of two years from the end of the meeting.</p> <p>The controller and/or Flik Helsinki Oy on behalf of the controller retains personal data necessary for the purposes of following the Annual General Meeting via webcast up to a maximum of two years from the end of the meeting.</p> <p>Other personal data shall be retained as long as is necessary for the purposes set out in this Information Notice or to fulfil any obligation of the controller arising from applicable law, regulation or other source of authority.</p>
<p>10. Right of access and realization of the right of access</p>	<p>The data subject shall have the right of access, after having supplied sufficient search criteria, to the data on themselves in the personal data file, or to a notice that the file contains no such data. The controller shall at the same time provide the data subject with information of the sources of data in the file, on the uses for the data in the file and the destinations of disclosed data.</p> <p>The data subject who wishes to have access to the data on themselves, as referred to above, shall make a request to this effect to the person in charge at Orion Corporation by a personally signed or otherwise comparably verified document and proving his/her identity by attaching a copy of a valid proof of identity to the request.</p> <p>Requests for the right of access shall be directed to contact person of the register; please see the contact details above.</p>
<p>11. Right to object to processing</p>	<p>In case the legal basis for processing the personal data is the legitimate interests of the controller, the data subject has the right to object to processing on grounds relating to his or her particular situation.</p>

	<p>In case the data subject wishes to use his/her above-mentioned rights, he/she shall make a request to this effect to the person in charge of the register at the data controller by a personally signed or otherwise comparably verified document in writing to the representative of the data controller named under section 2 above.</p>
<p>12. Rectification, restriction of processing and erasure</p>	<p>The controller shall, on its own initiative or at the request of the data subject, without undue delay rectify, erase or supplement personal data contained in its personal data file if it is erroneous, unnecessary, incomplete or obsolete as regards the purpose of the processing.</p> <p>Under specific circumstances, the data subject has the right to obtain from the controller restriction of processing of his or her personal data.</p> <p>If the controller refuses the request of the data subject as regards his/her data subject's rights, a written certificate to this effect shall be issued. The certificate shall also mention the reasons for the refusal. In this event, the data subject may bring the matter to the attention of the Data Protection Ombudsman.</p> <p>The controller shall notify the rectification of the data to the controllers to whom the incorrect personal data has been disclosed or from whom the controller has received the incorrect personal data. However, there is no duty of notification if this is impossible or unreasonably difficult.</p> <p>Requests for rectification shall be directed to the contact person of the register; please see the contact details above.</p> <p>You have the right to make a complaint to a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of personal data relating to you infringes the General Data Protection Regulation. However, we wish that you would contact us as the first instance to afford us the opportunity to address your concern before you contact the authority.</p>