

Modulight Corporation Data Protection Notice – Annual General Meeting

This privacy statement describes the processing of personal data related to Modulight Corporation's General Meeting.

1. Controller and contact information

Modulight Corporation
PL 770
FI-33101 TAMPERE
Business ID: 1603878-3

Contact person:

Anca Guina
Director Finance & Regulatory
+358 40 830 4674
anca.guina@modulight.com

2. Name of the register

Modulight Corporation's register of general meetings

3. Purpose and legal basis for processing Personal Data

The purpose of processing of personal data is to enable carrying out the General Meeting of the controller in accordance with the law and to enable the shareholders of Modulight Corporation to register for, participate and advance voting in the Annual General Meeting to be held on 2 May 2023.

Personal data are processed only for the purposes necessary for the organisation of the General Meeting, such as to verify the identity of the registrant and their right to participate, preparing a list of participants, a list of votes and possible voting tickets, organizing any voting, and manage possible preliminary questions and requests to be heard.

A list of participants as well as the poll results summary will be prepared to be attached to the minutes of the Annual General Meeting.

The technical implementation of the registration system and possible advance voting at the General Meeting is carried out by Innovatics Ltd. The shareholder's register is maintained by Euroclear Finland Oy.

The legal basis for the processing of personal data is in particular the compliance with the legal obligations to which Modulight Corporation is subject, based on the Finnish Companies Act (624/2006) and other legislation. Personal data may also be processed on the basis of legitimate interest of Modulight Corporation or a third party, in which cases the legitimate interest is in particular justified purposes related to the business of Modulight Corporation, such as administrative activities, ensuring of physical security, protection of property, investigation of misuse, as well as potential merger and acquisition activities.

#1761137v2

The provision of personal data as specified in this Data Protection Notice is necessary in order for Modulight Corporation to fulfil its legal obligations. Should the data subject not provide his/her personal data to Modulight Corporation as described in this Data Protection Notice, the sending and handling of the shareholder's registration is not possible, which means that the data subject cannot participate in the Annual General Meeting.

4. Processed personal data

The processed personal data include the shareholder's and his/her representative's (if any) name, personal identity number and/or business ID, address, contact details, number of shares and votes, voting information, authentication method, basis of representation, date of registration, and possible information on assistant, proxy, preliminary questions, and any other additional information provided in connection with the registration. In addition, the participant's the time of arrival and exit will be recorded. For technical maintenance and monitoring of the service, log data on registration and voting, as well as the user's IP address will also be recorded.

The register contains the list of shareholders on the record date created by Euroclear Finland for the General Meeting, containing, e.g., the shareholder's name, personal identity number/business ID, address, and number of shares.

The register contains a temporary list of shareholders created by Euroclear Finland for the General Meeting, containing information on nominee registered shareholders registered for the General Meeting and their number of shares.

5. Regular sources of data

Personal data is mainly collected from the shareholder themselves or from their representative in connection with the registration to the General Meeting. When registering via e-mail, mail or telephone, the controller or Innovatics Ltd enters the registrant's personal data and advance votes into the register.

Based on the personal data provided in connection with the registration, Innovatics Ltd retrieves the number of shares of the shareholder on the record date from the list of shareholders created by Euroclear Finland.

Innovatics Ltd enters the voting instructions for nominee registered shareholders represented by account operators at the General Meeting into the register.

6. Disclosures and transfers of personal data

In accordance with the Limited Liability Companies Act, a list of shareholders is displayed at the General Meeting containing the names of the shareholders, the municipality and the number of shares and votes on the record date of the meeting. The list also contains information on nominee registered shareholders who are temporarily registered in the list of shareholders for the General Meeting.

Modulight Corporation may disclose personal data to competent authorities when required to do so under the applicable laws, to prepare for legal proceedings or to defend a claim within the limits permitted or required by the applicable laws from time to time. If Modulight Corporation reorganizes its business, personal data may be disclosed to the purchaser candidates and their representatives in accordance with the applicable law from time to time.

Modulight Corporation may use service providers in the processing of personal data described in this Data Protection Notice and may transfer personal data to such service providers to the extent necessary in order for them to provide the services agreed to Modulight Corporation.

Personal data may be transferred to countries outside the EU or the European Economic Area (EEA). In such cases, Modulight Corporation will ensure the adequate level of data protection. Information on transfers of personal data outside the EU or EEA area and on the appropriate safeguards applied thereto is available from the contact person mentioned in Section 1 above.

Text messages for persons registered to Annual General Meeting will be sent via Swiss service.

7. Basis for register protection

Physical material is stored in a locked room and is available only for authorized persons.

Electronic material is stored in a data room that meets the requirements for the processing of personal data. The connection from the user's browser to the server is encrypted. Access to the register is limited to the employees of the controller and service providers who need and process data to organise the General Meeting.

8. Storage and deletion of personal data

Innovatics Ltd stores the personal data for a maximum of one year after the end of the Annual General Meeting.

Euroclear Finland Oy stores personal data for a maximum of four months after the end of the General Meeting.

Personal data entered into or attached to the minutes of the annual general meeting will be retained as defined in the Finnish Limited Liability Companies Act (624/2006) for an indefinite period of time. Other personal data will be destroyed in a secure manner after they are no longer necessary for the preparation of the minutes or the verification of its validity.

9. Rights of the data subject

The data subject may use the rights related to the processing of his/her personal data specified below with regard to Modulight Corporation. The exercise of the rights is a personal right of the data subject and requires identification.

- Right of access: The data subject has the right to obtain a confirmation from Modulight Corporation on whether Modulight Corporation processes personal data concerning the data subject, as well as the right to access such data. Modulight Corporation may request the data subject to specify his/her request, amongst others, with regard to the details of the data to be delivered.
- Right to rectification: The data subject has the right to obtain from Modulight Corporation the rectification of inaccurate personal data concerning him/her processed by Modulight Corporation, and to have incomplete personal data processed by Modulight Corporation to be completed.

- Right to be forgotten: The data subject has the right to obtain from Modulight Corporation the erasure of personal data related to him/her. Modulight Corporation has the obligation to erase such data in case there is no longer a legal ground for the processing of such data and the legal obligation binding Modulight Corporation related to the storing of the personal data has terminated.
- Restriction of processing: In certain cases prescribed by law, the data subject has the right to obtain from Modulight Corporation restriction of processing of his/her personal data.
- Right to object to processing of personal data: In certain cases, the data subject may have the right to object to processing of his/her personal data. The right to object is applicable in such situations in particular where the processing of personal data is based on the controller's legitimate interest. In such situations, Modulight Corporation has to comply with the data subject's request, unless Modulight Corporation demonstrates compelling legitimate grounds for the processing, which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

The requests shall be directed to the contact person mentioned in Section 1 above.

The data subject has the right to lodge a complaint with the Data Protection Ombudsman if they have objections to the processing of personal data. The instructions are found on the website of the Data Protection Ombudsman at <https://tietosuoja.fi/>

#1761137v2