

Modulight Corporation Data Protection Notice – Annual General Meeting

This data protection notice describes the personal data processing related to Modulight Corporation's Annual General Meeting.

1. Register Controller and Contact Details

Register Controller:

Modulight Corporation (“**Modulight**”)
Hermiankatu 22
FI-33720 Tampere
Business ID: 1603878-3

Contact Person:

Anca Guina
CFO
040 830 4674
anca.guina@modulight.com

2. Name of the register

Modulight's Annual General Meeting register.

3. Purpose and legal basis for the processing of Personal Data

The purpose of processing of personal data is to enable the shareholders of Modulight to register for and participate in the Annual General Meeting of shareholders to be held on 2 May 2022.

The personal data is used only for purposes necessary to organizing the Annual General Meeting, such as verifying the shareholders' identity and his/her right to attend the Annual General Meeting, preparing a list of participants, a list of votes and ballots, as well as for organizing any polling, managing questions asked in advance and controlling requests to speak.

A list of participants as well as a summary of poll results will be drafted as attachments to the minutes of the Annual General Meeting on basis of the information in this register.

Innovatics Ltd is the technical service provider of the registration system and advance voting. 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 is subject, based on the Finnish Companies Act (624/2006) and other legislation. Personal data may also be processed on the basis of legitimate interests of Modulight or a third party, in which cases the legitimate interests are, in particular, the justified purposes related to the business of Modulight, such as administrative activities, ensuring of physical security, protection of property, investigation of misuse, as well as potential merger and acquisition activities.

Should the data subject not provide his/her personal data to Modulight 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 consists of 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, method of identification, basis of representation, date of registration, and information on assistant (if any), proxy, questions asked in advance and any other additional information provided during the registration process. In addition, the participants' time of arrival and exit will be recorded. For the technical maintenance and monitoring of the service also the log information on registration and voting as well as the IP-address of the user will be recorded.

Register contains Euroclear Finland's shareholders' register at the record date, which contains e.g. the name of the shareholder, business or personal identification number, address and the number of shares.

Register contains Euroclear Finland's temporary list of nominee registered shareholders, which have registered to participate in the Annual General Meeting, and the number of their shares.

5. Regular sources of data

Personal data is mainly collected from the shareholder himself/herself or from his/her representative in connection with the registration. When registering via email, mail, or telephone, the personal data and advance votes are entered in the register by Modulight or Innovatics Ltd.

Innovatics Ltd retrieves the shareholder's amount of shares based on the given personal data from the shareholders' register of the record date of the Annual General Meeting maintained by Euroclear Finland Oy.

Innovatics Ltd enters the information about the voting instructions of holders of nominee registered shares.

6. Disclosures and transfers of personal data

In accordance with the Finnish Companies Act, a shareholders' register of the record date, which contains the name of the shareholder, municipality as well as number of shares and votes will be kept available at the Annual General Meeting. Register also contains information on the temporary listed nominee registered shareholders.

Modulight 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 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 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.

Personal data may be transferred to countries outside the EU or the European Economic Area (EEA). In such cases, Modulight 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. Protection of the personal data

Non-digital data is kept in a locked space and is available only for authorized persons.

Digital data is stored in a data center that meets the requirements for processing personal data. Data connection between the user's browser and the server is encrypted. Access to the system is limited to those employees of Modulight and its subcontractors who need and process the information for arranging the Annual General Meeting.

8. Retention and deletion of the personal data

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. 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 on whether Modulight processes personal data concerning the data

subject, as well as the right to access such data. Modulight 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 the rectification of inaccurate personal data concerning him/her processed by Modulight, and to have incomplete personal data processed by Modulight to be completed.
- Right to be forgotten: The data subject has the right to obtain from Modulight the erasure of personal data related to him/her. Modulight 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 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 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 has to comply with the data subject's request, unless Modulight 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 competent supervisory authority if he/she has any remarks regarding the processing. The related instructions of the Data Protection Ombudsman can be found on the website of the Data Protection Ombudsman at <https://tietosuoja.fi/en/home>.