

Information on the Processing of Personal Data of AS LHV Group Shareholders

Personal data of shareholders will be processed in the course of convening and carrying out the general meeting of AS LHV Group shareholders (hereinafter the **General Meeting**).

The controller of personal data is AS LHV Group, registry code 11098261, address Tartu mnt 2, Tallinn, 10145 (hereinafter **LHV Group**), which will determine the purposes and means of the processing of personal data.

Personal data to be processed, the purpose and legal basis of the processing of personal data

The purpose of processing of personal data is to enable LHV Group's shareholders (hereinafter **shareholder** or **shareholders**) to take part in the ordinary General Meeting and to exercise their rights at the meeting in conformity with the articles of association of LHV Group and the Commercial Code.

Personal data to be processed are:

- 1) for shareholders who are natural persons or their representatives: first and last name, personal identification code, identity document data, data regarding document proving the representative's right of representation (power of attorney etc.), residency;
- 2) for shareholders who are legal persons, their representative's first and last name, personal identification code, identity document data, data regarding power of attorney proving the authorized representative's right of representation;
- 3) contact data for shareholders and shareholder representatives (address, email address, telephone number);
- 4) data related to shares – number of shares, size of holding, type and nominal value of share, rights arising from the share, securities account number and bank account number and bank;
- 5) data on registration for the General Meeting and means of participation at the meeting (physical or electronic participation);
- 6) data concerning advance voting and participation at the meeting, including data on exercise of voting rights and other rights;
- 7) logs of operations carried out by the shareholder on the meeting website (i.e. in the electronic voting environment);
- 8) the voice of the shareholder or their representative in a video recording.

Processing of personal data consists above all of the following:

- 1) notification of the shareholder of the upcoming General Meeting;
- 2) registration of the shareholder for the General Meeting;
- 3) verification of the right to participate in the General Meeting and voting right;
- 4) addition of shareholder data to the list of meeting participants;
- 5) participation of the shareholder in pre-voting and electronic voting;
- 6) verification of electronic and paper ballots;
- 7) conducting of proceedings on requests for information submitted by shareholders to the management board of LHV Group, requests to admit additional questions to the General Meeting's agenda and/or draft decision submitted with regard to an agenda item at the General Meeting;
- 8) preparation of the General Meeting minutes and annexes thereto;

- 9) transmission of the General Meeting minutes and annexes thereto to notary and Commercial Register;
- 10) filming of the General Meeting.

The legal basis for processing of personal data is compliance by LHV Group with obligations arising from the Commercial Code.

Video of the shareholders' General Meeting can be streamed in real-time on the website investor.lhv.ee/uldkoosolek/. A recording of the videocast will be posted to the LHV Group investor page <https://investor.lhv.ee/uldkoosolekud/> and to YouTube during the three (3) years following the day of the General Meeting. Shareholders will not be filmed in the video, but a shareholder's voice may be heard on the video if the shareholder wishes to ask questions addressed to the management board of LHV Group at the General Meeting (LHV Group's management board will answer the questions pursuant to the instructions for following of annual General Meeting). The production of the videocast and processing of personal data in relation thereto takes place on the basis of LHV Group's legitimate interest. If a shareholder does not wish for their voice to be recorded in the course of the videocast, they may send their questions to the management board of LHV Group electronically.

Sources of personal data

LHV Group gathers the personal data necessary for electronic participation at the General Meeting directly from shareholders, from the Estonian Securities Register, the Commercial Register and AS LHV Pank.

Sharing personal data with third parties

LHV Group shares shareholder personal data with third parties solely in the extent required and on condition there is a legal basis for doing so.

If necessary, LHV Group sends shareholders' personal data to notaries, the Commercial Register, the Estonian Securities Register and financial supervision authorities. These institutions will process shareholders' personal data as independent data controllers.

LHV Group has engaged other companies in the following data processing: administration of the electronic voting environment, carrying out authentication of persons and digital signing, carrying out the videocast, archival of documents. These companies will process shareholders' personal data solely for the purpose and in the extent related to the corresponding data processing, on behalf of LHV Group and in the role of data processors authorized by LHV Group.

Shareholders' rights in connection with processing of personal data

As data subjects, shareholders have the following rights pursuant to the General Data Protection Regulation:

- right to access data;
- right to have data rectified;
- right to have data erased;
- right to restrict processing of personal data;
- right to object to processing of personal data;
- right to have data transferred;
- right to lodge a complaint to the Data Protection Inspectorate as the institution performing supervision of data protection or to apply to a court if the shareholder believes LHV Group is in breach of its right to protection of personal data.

The data subject can exercise its rights pursuant to conditions set forth in the General Data Protection Regulation and other applicable legal acts. To exercise their rights, shareholder can contact LHV Group by email at compliance@lhv.ee.

Retention of personal data

LHV Group retains personal data in order to perform obligations arising from legislation as follows: minutes of General Meetings and annexes thereto, and all materials related to carrying out General Meetings will be retained for at least the duration of LHV Group's operations. Video recordings of General Meetings will be retained internally at LHV Group for fifty (50) years from the day of the General Meeting.

Contact

For additional information, shareholders may contact LHV data protection specialist at compliance@lhv.ee.