

Privacy Policy for Shareholder Register

1. Controller

Uponor Corporation (“Uponor”)
Äyritie 20
01511 Vantaa
Finland
Telephone: +358 20 129 211

2. Contact Person

Reetta Härkki
Äyritie 20
01511 Vantaa
Finland
Telephone: +358 20 129 2835
E-mail: reetta.harkki@uponor.com

3. Name of Personal Data Register

Uponor’s Shareholders Personal Data Register

4. Group of Data Subjects

Uponor’s shareholders

5. Purpose and Legal Basis of Processing Personal Data

The purpose of this personal data register is to maintain a shareholder register for compliance with the applicable legislation.

The processing of shareholders’ personal data for the abovementioned purpose is based on a legal obligation to which Uponor is subject.

6. Content of the Personal Data Register

The personal data register shall contain the following information regarding the shareholders:

- Name of the shareholder or the nominee registration custodian
- Personal identity code
- Contact, banking and taxation details
- Number of the shares
- The central securities depository participant who manages the book-entry account in which the shares are registered

For the temporary inclusion in the shareholder register under the Finnish Limited Liability Companies Act Chapter 5, Section 6a, the personal data register shall contain the following information:

- name
- address
- personal identity code
- number of shares

As required by applicable law, Euroclear Finland Oy shall maintain the shareholder register indefinitely.

7. Regular Sources of Information

The data is primarily collected from each data subject him/herself and from the book-entry system in Finland.

Uponor informs each data subject of the data processing, including of any third party data sources and data collected from such sources, in accordance with applicable legislation.

The data is entered into the personal data register by Euroclear Finland Oy.

8. Disclosure and Transfer of Personal Data Outside the EU/EEA Area

Uponor discloses personal data to Euroclear Finland Oy to the extent they participate in the processing of personal data for the purposes stated in this data register and in accordance with and subject to the limitations imposed by applicable legislation. Uponor does not transfer personal data outside EU/EEA. For technical reasons and for reasons related to the use of data, the personal data may be stored on servers of external service providers who may process the data on behalf of Uponor.

In addition, Uponor publishes a list of largest shareholders on its website <https://investors.uponor.com/shareholders/major-shareholders>.

9. Rights of Data Subjects

Unless any limitations apply, each data subject has the right to access all personal data Uponor have on him/her. Each data subject also has the right to request that Uponor corrects, erases or stops using any erroneous, unnecessary, incomplete or obsolete personal data. Each data subject may also withdraw any consent previously provided by him/her.

Any requests should be sent to the contact person mentioned in Section 2 above. Uponor processes all requests as soon as possible. If dissatisfied with the decision or actions of Uponor, each data subject has the right to lodge a complaint with his/her country's data protection authority.

10. Principles of Securing Personal Data – Technical and Organisational Controls

Uponor shall ensure that sufficient technical and organisational personal data protection measures are implemented and maintained throughout its own organisation. Further, Uponor shall ensure that any transfer or disclosure of personal data described in this personal data register to any third party is subject to Uponor having ensured an adequate level of data protection by agreements or by other means required by law.

Technical controls:

Physical material is stored in locked spaces with restricted access. Any IT systems are secured by means of the operating system's protection software. Access to the systems requires entering a username and a password and data transfers happen via high encryption channels.

Organisational Controls:

Within the organisation of the controller, the use of the personal data is instructed, and access to IT systems including personal data is limited to such persons who are entitled to access them on the basis of their work assignments or role and who are subject to confidentiality obligations regarding the personal data.