

Privacy Statement – Project Insider List

Last updated: 13.09.2023

1. Controller

Uponor Corporation
Ilmalantori 4
FI-00240 Helsinki
Finland

Uponor Corporation hereinafter also "Uponor".

2. Contact Person

Reetta Härkki
Ilmalantori 4
FI-00240 Helsinki, Finland
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Email: reetta.harkki@uponor.com

3. The purpose and legal basis for the processing of the personal data

The purpose for the processing of data is to enable Uponor to maintain project-specific insider lists of persons who have access to inside information and who are working for Uponor or its affiliates under a contract of employment, or otherwise performing tasks through which they have access to inside information, in accordance with applicable EU and national legislation. The register shall comprise project-specific insider lists, with each project-specific list containing information only on persons who have access to the inside information relating to the specific project in question.

The legal basis for processing personal data is to comply with the legal obligations as required by the Market Abuse Regulation (EU) (596/2014), EU Commission's Implementing Regulation (EU) 2016/347 and the Finnish Securities Market Act (746/2012).

4. Group of Data Subjects

Uponor's and its affiliates' employees and external consultants, Uponor Board members, and other externals who receive insider information.

5. Data Subjects and Personal Data Processed

Uponor processes information such as:

- First name(s), surname(s) and birth surname(s) (if different) of the insider
- E-mail address
- Professional telephone number(s) (work direct telephone line and work mobile numbers)
- Company name and address
- Function and reason for being insider
- The date and time at which a person obtained access to inside information
- The date and time at which a person ceased to have access to inside information
- Date of birth
- National Identification Number (if applicable)
- Personal telephone numbers (home and personal mobile telephone numbers)
- Personal full home address: street name; street number; city; post/zip code; country

6. Regular Sources of Data

The personal data is primarily collected from each data subject themselves, by Uponor personnel or through website or applications or from the employer of the data subject.

Personal data may in some situations, as allowed by applicable legislation, be collected from other sources than directly from the data subject, e.g., from Uponor's processing of employee data.

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

Data may be disclosed in accordance with applicable legislation to the competent authorities, such as the Finnish Financial Supervisory Authority.

Uponor uses an external service provider for Project Insider lists. The service provider and its subcontractors act as data processors of Uponor, and the personal data will be processed by such service providers only for the provision of services to Uponor and on behalf of Uponor.

Personal data is not regularly transferred to countries outside the European Union or the European Economic Area. 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 outside European Union or the European Economic Area on an irregular basis. In the event of any such transfer, appropriate safeguards will be implemented, such as standard contractual clauses or other mechanisms required by relevant data protection laws.

8. The storing and retention of personal data

Data is processed and stored electronically. No manual register shall be kept.

Personal data will be retained for as long as is necessary and required by applicable law. As a rule, each project-specific insider list shall be retained for a period of at least five (5) years from the date of closing the insider list.

9. Rights of the Data Subjects

Unless any limitations apply, each data subject has the right to access all personal data Uponor have on them. Each data subject also has the right to request that Uponor corrects, erases or stops using any erroneous, unnecessary, incomplete or obsolete personal data.

The rights above may be exercised via [a form](#) on Uponor website or by contacting the 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 their country's data protection authority.

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

Uponor shall ensure that sufficient technical and organisational personal data protection measures are implemented and maintained throughout its own organisation. In addition, Uponor shall ensure that any transfer or disclosure of personal data described in this privacy statement 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:

Uponor and the technical implementation provider have instructed their organisations on the processing of personal data. The access to IT systems containing personal data is limited to persons

entitled to access based on their work assignments or role and who are subject to confidentiality obligations regarding the personal data.