

Data Protection Policy

In this policy, data protection refers to the safeguarding of privacy in the processing of personal data. The data protection policy outlines the fundamental requirements for data protection within the Temet Group and provides the foundation for planning and implementing actions in accordance with the policy. To support the implementation of the policy, more detailed guidance will be developed for different areas of data protection. Data protection is closely linked to information security, which serves as an enabler for data protection, and its principles are defined in the Information Security policy. Both are implemented and developed based on identified risks, using appropriate solutions.

Temet's business is based on information and its processing in Temet's operating environments. The goal of data protection is to ensure the continuity of the company's information and communication technology, ensuring uninterrupted and secure operations in all circumstances, so that information is not unintentionally leaked to third parties. Temet is prepared for various operational disruptions and exceptional circumstances regarding the processing of personal data, as applicable. Special attention is given to situations where the processing of personal data is outsourced. The policy also supports the Temet Group and its companies in fulfilling their obligations and complying with relevant legislation.

1. Data Protection Principles

- **Lawfulness, fairness, and transparency**

Data is collected and processed in accordance with the data protection regulation and other applicable laws. Data protection notices have been prepared for the registers, and the legal basis for processing personal data is described in the data privacy notices. Temet's data protection notices are available on the website and through communication channels for personnel. Information about data protection is also provided in a case-by-case situations connected with communication.

- **Purpose limitation and data minimization**

Data is collected and used only to the extent and for as long as necessary for the intended purpose.

- **Accuracy, restriction, integrity, and confidentiality**

Personal data is kept up to date, and outdated data is deleted or updated. The integrity of the data is monitored. Access to the data within the organization is restricted as appropriate, and confidentiality is ensured through administrative and technical measures. Compliance with these principles is monitored, exceptions are addressed, and their implementation is demonstrated through documentation.

- **Accountability**

Data protection requirements are set during the design and procurement phase of a system, application, or service. Temet implements the required technical and administrative changes before systems are deployed to ensure the protection of the rights and privacy of data subjects. If an acquired application is deemed to pose significant risks to data protection, a data protection impact assessment is conducted. Data protection requirements apply to information throughout its lifecycle, and the organization guides, develops, and monitors compliance with accountability obligations.

2. Responsibilities and organization

Temet Group's executive board is responsible for maintaining, approval and informing of the Data Protection policy.

The Group's management and legal services monitor and evaluate the implementation of data protection. The overall responsibility for implementing and managing data protection lies with the Group's executive board, which is responsible for ensuring compliance with data protection legislation, this data protection policy, and the guidelines issued based on it. The management is responsible for ensuring that data protection is clearly organized, and that each responsible individual understands their role.

The data controller is the company within the Temet Group for which personal data is processed for specific purposes. The responsibility for implementing data protection lies with the business and group management in their own units, this includes the stakeholders who process personal data held by Temet within the framework of their assignments.

Temet's personnel must follow the policy, the given data protection-related instructions, and participate in training. Employees must also report any observed data protection violations and adhere to confidentiality obligations.

3. International Transfers of Personal Data

The data protection policy covers the operations of Temet companies in all of the countries where Temet operates. Due to the international structure of Temet's operations, personal data may be transferred outside the EU/EEA area. Within the EU/EEA, it is permissible to transfer personal data from one country to another. When transferring personal data outside the EU or EEA, we ensure that an adequate level of data protection is implemented in the destination country as well.

4. Procedure in Case of Data Protection Breach

Temet aims to safeguard personal data against security breaches, meaning to protect it from unlawful or accidental destruction, loss, alteration, unauthorized disclosure, or access. If Temet becomes aware, through self-monitoring or notification, that data protection has been compromised, we will assess the risks from the perspective of the individual's rights. Temet documents security breaches and, in the case of a confirmed breach, will notify the data protection authority when the threshold for notification is met. Additionally, in such cases, we will inform the individual affected by the breach and, if applicable, the police, in cases where criminal charges are applicable.

5. Consequences

Temet is responsible for any damage caused to the data subject as a result of unlawful processing of personal data. Unlawful processing of personal data may also lead to potential criminal sanctions. Additionally, a violation of data protection obligations may result in an administrative fine imposed on Temet by a supervisory authority. Actions that violate the regulations concerning personal data processing, this data protection policy, or Temet's data protection guidelines will be considered actions that endanger data protection and may result in disciplinary or employment-related sanctions for Temet's personnel.

6. Communication

This policy has been published on Temet's website.

Approved by Temet's executive board on 08.11.2024

Valid from 11.11.2024