

PRIVACY POLICY FOR BIORETEC LTD'S ANNUAL GENERAL MEETING

1 GENERAL

In this privacy policy we provide information required by the General Data Protection Regulation 2016/679 of the European Union ("**GDPR**") to persons invited to, participating in or registered for the Annual General Meeting of Bioretec Ltd to be held on 8 May 2026 ("**AGM**" or "**General Meeting**").

2 CONTROLLER AND CONTACT DETAILS OF THE CONTROLLER

Bioretec Ltd ("**Bioretec**" or "**we**") acts as the data controller in accordance with this privacy policy.

The contact person of the controller is Tuukka Paavola, Chief Financial Officer.

Address: Yrittäjänkulma 5, 33710 Tampere

E-mail: IR@bioretec.com

3 PURPOSES AND LEGAL BASES FOR THE PROCESSING OF PERSONAL DATA

The main purpose of processing personal data is to organize and conduct the AGM in accordance with applicable law. Personal data is collected and processed to enable Bioretec's shareholders to register for the AGM and to enable the shareholders to identify themselves when registering so that Bioretec can recognize the registration and the shareholder's ownership. In addition, the data may be processed for the purpose of organizing possible votes. We can only process personal data on legal bases derived from data protection legislation.

The technical implementation of the registration system, General Meeting hall bookkeeping and possible advance voting and/or possible voting during the General Meeting is carried out by Innovatics Ltd. Inderes Oyj is responsible for the General Meeting service in its entirety. The shareholder register is maintained by Euroclear Finland Oy.

Remote access to the general meeting will be provided via Inderes Oyj's virtual general meeting service on the Videosync platform, which includes video and audio connections to the AGM.

The main legal bases for processing the personal data described herein are Bioretec's legal obligations regarding the organization of the AGM and the verification of the participants' identities, in particular the obligations under the Finnish Companies Act (624/2006, as amended) to organize a General Meeting and to prepare minutes and a voting list of the General Meeting, as well as other legal obligations under applicable legislation, such as the Securities Market Act (746/2012, as amended). We may also process your personal data based on Bioretec's legitimate interests in relation to the organization and proper conduct of the AGM.

4 PERSONAL DATA PROCESSED

Personal data is processed only in connection and for the purposes necessary for the organization of the AGM, such as to verify the identity of the registrant and their right to participate, prepare a list of participants, a list of votes, possible ballots and the minutes of the AGM, organize any voting, and manage possible questions and requests to address the meeting. To this extent, the personal data processed in connection with the AGM includes the following personal data of the shareholders or their representatives:

- the shareholder's and their proxy representative's, if applicable, identity and contact data (name, personal identity number and/or business ID, date of birth, address, contact details);
- information related to the shareholder's shares (number of shares and votes, and voting information); and
- information regarding the participant's registration to the AGM (authentication method, IP address, registration log data, possible basis of representation, date of registration, and possible information on legal adviser, power of attorney, possible information on assistant, preliminary questions, and any additional information provided in connection with the registration).

When participating in the AGM, the time of arrival and departure of each participant are also recorded.

We also process personal data included in Bioretec's shareholder register of the record date created by Euroclear Finland Oy for the AGM, containing, e.g. the shareholder's name, personal identity number and/or business ID, address, and number of shares. In addition, we process personal data included in the temporary list of shareholders, compiled by Euroclear Finland Oy, including information on the holders of nominee-registered shares who have registered for the AGM and the number of shares held by them.

5 SOURCES AND UPDATING OF PERSONAL DATA

The personal data we process is mainly obtained from the data subjects themselves or from their representatives when registering for the AGM. In the event of registration by email or post, the controller or Innovatics Ltd will enter the registrant's personal data and any advance votes into the register.

Based on the personal data provided in connection with the registration, Innovatics Ltd retrieves the number of shares of the shareholder on the record date from the list of shareholders created by Euroclear Finland Oy.

Innovatics Ltd enters the voting instructions for nominee registered shareholders represented by account operators at the General Meeting into the register.

When granting a proxy or when the shareholder or the proxy representative invites an assistant, the shareholder also enters the necessary personal data for such proxy representative or assistant.

6 RECIPIENTS OF PERSONAL DATA

We primarily process personal data in the internal operations of Bioretec. In addition, Bioretec discloses personal data to third parties who act as service providers and processors for Bioretec, including the following:

- Inderes Oyj;
- Innovatics Ltd; and
- Euroclear Finland Oy.

Service providers process personal data only to the extent necessary to provide the service in question or in connection with system maintenance and troubleshooting. Further information on the processing of data by such service providers can best be found on their own websites. Each service provider processes personal data only to the extent necessary for the provision of the applicable service.

Personal data may also be disclosed to the participants of the AGM, other shareholders, and third parties such as affiliates of Bioretec in accordance with applicable law. The disclosed information will be used to compile a list of participants of the AGM as well as voting summaries, which will be attached to the minutes of the AGM. In accordance with the Finnish Companies Act, a list of shareholders will be made available for inspection in connection with the General Meeting which shall include the names and addresses or municipalities of residence and dates of birth of the shareholders as of the record date of the meeting, as well as the number of individual shares or share certificates by share class and the date of issue of the shares. The list shall also include the details of nominee-registered shareholders who have temporarily registered for the AGM.

We may also transfer or disclose personal data to authorities if required by applicable laws.

7 TRANSFER OF PERSONAL DATA TO THIRD COUNTRIES

In principle, Bioretec does not transfer data outside the European Union or the European Economic Area ("**EU/EEA**"). However, data may be transferred outside the EU/EEA in situations where our service providers or their parent companies are located in such third countries. Where data is transferred outside the EU/EEA, such transfers will be subject to the requirements set out in data protection legislation, such as the European Commission's Standard Contractual Clauses or other transfer mechanism designated in the GDPR.

For recipients with Finnish phone numbers, text messages are sent via a Finnish service provider. For those with foreign numbers, text messages are sent using a Swiss service.

It is possible to use the right to speak virtually in the General Meeting and the right to speak will be enabled by a US service provider.¹ The aforementioned service provider processes the IP address and name of the person using the right to speak.

8 DATA RETENTION PERIOD OR CRITERIA FOR DETERMINING THE RETENTION PERIOD

Personal data is only stored for as long as necessary to fulfil the purposes set out in section 3 or in accordance with the retention periods specified in applicable law. When the retention period for personal data has expired and there is no longer any basis for processing it within the limits permitted by data protection legislation, the personal data will be deleted or anonymized.

In order to comply with Bioretec's legal obligations, the minutes of the AGM and the list of votes attached thereto shall be retained for the duration of Bioretec's operations. The minutes of the AGM include the names of shareholders who participated in the AGM, the names of possible proxy representatives and assistants, the number of shares and votes and ballot numbers.

Euroclear Finland Oy retains the personal data for a maximum of four (4) months after the end of the AGM.

Innovatics Ltd retains the personal data for a maximum of two (2) years after the end of the AGM.

Inderes Oyj stores personal data no longer than is necessary for purposes of processing. The retention period is estimated to be no longer than six (6) months after the end of the AGM.

9 SECURITY OF THE PROCESSING

Bioretec implements and maintains appropriate technical and organizational measures to ensure the protection of personal data, which may include, among others, the following:

- designated personnel responsible for developing, implementing and maintaining data security;
- internal guidelines and regulations on data security and data protection;
- non-disclosure agreements and undertakings;
- regular audit and risk assessment processes;
- processes for managing updates;
- control of access rights and use;
- data encryption;
- organised and regular staff training;
- business continuity and recovery plans; and
- physical and perimeter security of production facilities and other areas containing confidential client information.

The adequacy of the measures is scaled on the basis of a risk assessment, taking into account, among other things, the nature, scope, context and purposes of the processing, as well as the risks to the rights and freedoms of data subjects. The measures are regularly assessed and reviewed and updated, as necessary.

The data will not be used for profiling. The processing does not include automated decision-making.

10 RIGHTS OF THE DATA SUBJECT

As a data subject, you shall have the following rights:

Right of access to your data	<p>You have the right to know whether Bioretec is processing your personal data and what personal data Bioretec is processing. You can also request a copy of your personal data. You have the right to inspect the personal data concerning you.</p> <p>If you make your request electronically and have not requested another form of delivery, the data will be provided in the commonly used electronic format.</p>
Right to rectify your data	<p>You have the right to request that inaccurate or incorrect personal data concerning you be corrected or completed.</p>
Right to have your data erased	<p>You have the right to have your data deleted in certain cases. However, a request to delete personal data cannot be implemented if the personal data is processed or stored, for example, to comply with a legal obligation.</p>
Right to restrict the processing of your data	<p>In certain cases, you have the right to request restriction of the processing of your data.</p>
Right to object to the processing of your data	<p>You have the right to object to the processing of your data in certain cases. Bioretec may refuse a request if the processing is necessary for the legitimate interests of Bioretec or a third party or in order to comply with a legal obligation.</p>
Right to lodge a complaint with a supervisory authority	<p>You have the right to lodge a complaint with the competent supervisory authority if you consider that data protection legislation has not been respected in the processing of your personal data. In Finland, the supervisory authority is the Data Protection Ombudsman.</p>

All requests mentioned here should be sent to the contact person of Bioretec mentioned in section 2. You can make a free form request. We may ask you specific questions if necessary to fulfil your request.

More detailed information on the exercise of data subjects' rights is available on the website of the Data Protection Ombudsman (<https://tietosuoja.fi/en/what-rights-do-data-subjects-have-in-different-situations>).

ⁱ Read more about how Daily's data security and GDPR compliance: <https://www.daily.co/security/gdpr/> and <https://www.daily.co/products/security-at-daily/>