

INFORMATION NOTICE

Record of Processing Activities

**General Data Protection Regulation (2016/679),
Articles 13, 14 and 30**

Date of drafting: May 24th, 2018

We may update or revise this Information Notice/ Record of Processing Activities at any time, with any notice to you as may be required under applicable law. Your right to data portability and/or restriction of processing, if applicable, will become applicable as of May 25th, 2018.

1. Controller / Company	Orion Corporation (Company Identification Number: 1999212-6) Orionintie 1 02200 Espoo Finland Tel. 010 4261
2. The person in charge / contact person	Contact person: Sari Brunila Orion Corporation Orionintie 1A 02200 Espoo Tel. 010 426 3707 e-mail: sari.brunila@orion.fi Contact details of the Data Protection Officer: privacy@orion.fi
3. Name of the data file	Orion Corporation's MAR register
4. The purpose for processing the personal data / recipients (or categories of recipients) of personal data / the legal basis for processing the personal data	<p>The purpose of this register is to fulfil the obligations imposed on Orion Corporation in the Market Abuse Regulation (EU) 596/2014 ("MAR") regarding the collection of information and maintaining of lists. MAR requires Orion Corporation to collect information and maintain a list of (i) Orion Corporation's managers and their closely associated persons as well as the managers' and their closely associated persons' transactions, in each case, as defined in MAR, (ii) persons identified as having regular access to unpublished financial information of the Orion Group ("persons with an access to financial information of the Orion Group"), and (iii) of all persons who have access to inside information and who are working for the Orion Group under a contract of employment or service or otherwise performing tasks through which they have access to inside information (such as advisers, accountants or credit rating agencies) ("insider"). The aforementioned insider list may be divided into separate sections for permanent insiders and project-specific insiders for each insider project.</p> <p>The technical provider for the list of managers and their closely associated persons is Euroclear Finland Ltd. to which personal data may be transferred in connection with the provision of the service. In addition, the controller uses the services of Pohjoisranta Burson-Marsteller Oy for the purposes of publishing the notifications of managers' and their closely associated persons' transactions, in which connection personal data is transferred to Pohjoisranta Burson-Marsteller Oy.</p> <p>Where necessary, the controller transfers data to competent authorities upon the authority's request or demand in accordance with MAR or any other related regulation or instruction by authorities. The controller may also share data with third parties assisting the controller in performing technical operations, such as data storage and hosting.</p>

	<p>If ownership or control of Orion Corporation or all or any part of its products, services or assets changes, we may disclose your personal data to any new owner, successor or assignee.</p> <p>The legal basis for processing of the personal data is compliance with the controller's legal obligations based on binding law (EU General Data Protection Regulation Article 6.1.c)).</p>
<p>5. Content of the data file</p>	<p>The list of Orion Corporation's managers and their closely associated persons may include following data on the managers, their closely associated persons or contact persons of such closely associated persons, as well as persons authorized by the aforementioned:</p> <ul style="list-style-type: none"> • First names, surname and birth surname • Date of birth and National Identification Number • Nationality • Home address, e-mail address and telephone numbers • First name, surname, postal address, e-mail address and telephone number of authorized person / contact person • Date on which the person in question became a manager / closely associated person • Manager's position • For closely associated persons, the basis for such status • Notifications of transactions under MAR made to Orion Corporation <p>The list of persons with access to financial information of the Orion Group may include following data on such persons:</p> <ul style="list-style-type: none"> • First names, surname • Position • Employer (if not Orion Corporation) <p>The insider register may include following data on the insiders:</p> <ul style="list-style-type: none"> • First names, surname and birth surname • Date of birth and National Identification Number • Nationality • Work, personal and home telephone number(s) • Company's name and address • Home address • Function and reason for being insider • Date and time of commencement and termination of insider status
<p>6. Source of information</p>	<p>The controller collects the data on the managers and their closely associated persons pursuant to MAR from the managers and/or their closely associated persons / contact persons of closely associated persons, as well as from persons authorized by them, if any, and from public sources of information, such as the Trade Register. The data subjects themselves notify the controller of their transactions. Instructions for making the notification of transaction are available on the controller's website.</p> <p>The controller identifies the persons with access to financial information of the Orion Group as set out in MAR and collects any additional data that may be necessary directly from the person in question.</p> <p>The controller collects the data to be entered into the insider register directly from the data subjects as set out in MAR in connection with giving the insider notification on a paper form to be filled out by the data subject, and if and to the extent necessary, also from public sources of information.</p>

7. Retention period of the personal data	The period of retaining of the personal data is determined by the requirements set out in MAR and other applicable company and securities market legislation.
8. The principles how the data file is secured	<p>A. Manual data file</p> <p>The manual data shall be stored in an area with restricted access, available only for the authorized persons who need the data for performing their work.</p> <p>B. Electronic information</p> <p>The technical provider for the list of managers and their closely associated persons is Euroclear Finland Ltd. Technical data protection has been used in the implementation of Euroclear Finland Oy's electronic system to ensure that the information is available only to the authorized persons and regular access to the information is granted only to the controller's selected employees and not to Euroclear Finland Oy.</p> <p>Technical data protection has been used in the implementation of the parts of the register maintained in the electronic systems of both the controller and Pohjoisranta Burson-Marsteller Oy to ensure that the information is available only to the authorized persons.</p>
9. Right of access	<p>The data subject shall have the right of access, after having supplied sufficient search criteria, to the data on himself/herself in the personal data file, or to a notice that the file contains no such data. The controller shall at the same time provide the data subject with information on the sources of the data, on the uses for the data in the file, and the destinations of disclosed data.</p> <p>The data subject who wishes to have access to the data on himself/herself, as referred to above, shall make a request to this effect to the person in charge at controller by a personally signed or otherwise comparably verified document and by verifying his or her identity by attaching a copy of an official identification document.</p>
10. Rectification, restriction of processing and erasure	<p>A controller shall, on its own initiative or at the request of the data subject, without undue delay rectify, erase or supplement personal data contained in its personal data file if it is erroneous, unnecessary, incomplete or obsolete as regards the purpose of the processing.</p> <p>Under specific circumstances, the data subject has the right to obtain from the controller restriction of processing of his or her personal data.</p> <p>If the controller refuses the request of the data subject of the rectification of an error, a written certificate to this effect shall be issued. The certificate shall also mention the reasons for the refusal. In this event, the data subject may bring the matter to the attention of the Data Protection Ombudsman.</p> <p>The controller shall undertake reasonable measures to notify the erasure to the controllers to whom the data has been disclosed and who are processing the data. However, there is no duty of notification if this is impossible or unreasonably difficult.</p> <p>Requests for the above uses of data subject's rights shall be made by contacting the representative of the controller named under section 2 hereof.</p>