

DESCRIPTION OF PERSONAL DATA FILE (SECTIONS 10 AND 24 OF THE PERSONAL DATA ACT)

July 3, 2016

1. Data controller	Tikurila Oyj, business ID 0197067-4 (the " Company ") Kuninkaalantie 1, FI-01300 Vantaa
2. The person in charge / contact person	Johanna Suhonen Kuninkaalantie 1, FI-01300 Vantaa email: johanna.suhonen(at)tikurila.com phone: +358201912441
3. Name of the register	Register regarding persons discharging managerial responsibilities and persons closely associated with them as defined in the Market Abuse Regulation (EU) (596/2014).
4. The purpose for processing the personal data / the purpose for the use of a register	<p>The Market Abuse Regulation (EU) (596/2014) requires the Company to maintain a list of persons discharging managerial responsibilities at the Company and persons closely associated with them.</p> <p>The purpose for the processing of data contained in the register is to comply with the regulation governing the transactions of persons discharging managerial responsibilities and persons closely associated with them as set forth in Article 19 of the Market Abuse Regulation (EU) (596/2014).</p> <p>Data shall be processed by electronic means.</p> <p>A part of data processing is outsourced to Euroclear and to other service providers carrying out services to Tikurila Group.</p>
5. Content of the register	The register shall contain the following information: <ul style="list-style-type: none"> • Name • Position of the manager • Date of birth and National Identification Number (natural persons) and business ID or equivalent foreign ID (legal entities) • Nationality • With respect to persons closely associated; the grounds for being regarded as "closely associated" • Date on which the person commenced discharging managerial responsibilities or the date on which the person became closely associated with a manager. • Contact information (phone number, e-mail, postal address)
6. Regular sources of information	The information to be entered into the register shall be mainly collected from the persons themselves or from the entity which they work for. The information may also be updated on the basis of or obtained from Company's other registers, such as HR register.
7. Regular destinations of disclosed data and whether the data is transferred to countries outside the European Union or the European Economic Area	<p>Data may be disclosed to the recipients described in the Market Abuse Regulation and regulations issued on the basis thereof, such as the Finnish Financial Supervisory Authority.</p> <p>Personal data is not regularly transferred to countries outside the European Union or the European Economic Area. Some transfers of data within Tikurila Group companies and/or service providers carrying out services for Tikurila outside of EEA may take place.</p>

<p>8. The principles how the data file/register is secured.</p>	<p>A. Manual register</p> <p>All parts of manual register are kept in a locked place.</p> <p>B. Data processed by electronic means</p> <p>Access to the register is protected by passwords. Access to the register is restricted to identified persons within the Company or any person acting on its behalf or on its account that need that access due to the nature of their function or position.</p>
<p>9. Right of access and realization of the right of access</p>	<p>Regardless of secrecy provisions, the registered person shall have the right of access, after having supplied sufficient search criteria, to the data on him/her in the personal data file, or to a notice that the file contains no such data. The data controller shall at the same time provide the data subject with information of the regular sources of data in the file, on the uses for the data in the file and the regular destinations of disclosed data.</p> <p>A person, who wishes to have access to the data on himself/herself, as referred to above shall make a request to this effect to the data controller by a personally signed or otherwise comparably verified document.</p> <p>Above described requests shall be directed to the person mentioned in Section 2 above.</p>
<p>10. Rectification and realization of the rectification</p>	<p>The data 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. The data controller shall also prevent the dissemination of such data, if this could compromise the protection of the privacy of the person who has been entered into the register or his/her rights.</p> <p>If the data 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 data controller shall notify the rectification to the recipients to whom the data have been disclosed and to the source of the erroneous personal data. However, there is no duty of notification if this is impossible or unreasonably difficult.</p> <p>Above described requests shall be directed to the person mentioned in Section 2 above.</p>