

PRIVACY NOTICE

ANORA GROUP PLC ANNUAL GENERAL MEETING

1. CONTROLLER

The controller is Anora Group Plc (business ID: 1505555-7), Kaapeli aukio 1, 00180 Helsinki, tel. +358 207 013 013.

The person in charge of the processing of personal data / contact person: Sara Tuomala, Kaapeli aukio 1, 00180 Helsinki, tel. +358 40 5737439, sara.tuomala@anora.com.

2. PROCESSING OF PERSONAL DATA

2.1.1. Name of the register

Personal data register for the arranging the Annual General Meeting of Anora Group Plc ("Anora").

2.1.2. Purposes and grounds for processing

Anora will process your personal data for the following purposes:

- a) gathering the registrations to the Anora Annual General Meeting to be held 11 May 2022 and the confirmation of the registrant's identity and that (s)he has the right to participate and, if necessary, the sending of notices related to the registration through the systems of Euroclear Finland Ltd;
- b) drafting the participant list and the voting list for the Annual General Meeting and the printing of voting ballots and arranging any possible voting; and
- c) arranging and documenting the Annual General Meeting.

The participation list, which will be formed based on the register from the persons that arrive or otherwise participate in the Annual General Meeting, will be annexed to the minutes of the Annual General Meeting. The participant list will not contain data other than the names of the shareholders, possible proxy representatives and assistants and the numbers of shares and votes.

Certain arrangements relating to the Annual General Meeting are carried out by Anora's subcontractor Euroclear Finland Ltd, and therefore, the processing of personal data has been partly outsourced to Euroclear Finland Ltd. If the shareholder registers by phone or through the internet, Euroclear Finland Ltd handles the technical implementation of the collection of data. If a shareholder registers by mail or email, the information given when registering will be collected by Anora into a register maintained by Euroclear Finland Ltd. The connection from the user's browser to the server of Euroclear Finland Ltd is encrypted with SSL technology. In addition, Inderes Ltd provides Anora certain services relating to the electronic organization of the Annual General Meeting. Therefore, Inderes Ltd and its sub-processor Innovatics Ltd process personal data relating to e.g. voting.

The legal grounds for processing the personal data is the fulfilment of Anora's legal obligations, which are based on the obligations for the organizing of General Meetings set out in the Companies Act (642/2006, as amended) and other legislation binding on Anora. The collection and processing of the personal data is essential for the fulfilment of the legal obligations. Provision of personal data in connection with the registration and participation to the Annual General Meeting is a mandatory statutory requirement.

2.1.3. Processed personal data and sources of information

Personal data is collected primarily from the data subject.

The processed personal data consist of following data:

- name, personal identification number, address, phone number, email address
- book-entry account number and number of shares
- name and personal identification number of possible assistant or proxy representative

Secondarily, personal data is collected from the shareholder register of Anora maintained by Euroclear Finland Ltd by comparing the information given by the shareholder and by extracting from this register the information regarding the shares and votes held by the shareholder.

2.1.4. Recipients of data and the transfer of data to countries outside the European Union or the European Economic Area

Personal data is not transferred to countries outside the European Union or the European Economic Area.

Anora may share your personal data with third parties outside Anora's organization, if access to and use of the personal data is reasonably necessary to: (i) meet any applicable law, regulation, order or decision made by a relevant authority and/or court order; (ii) detect, prevent, or otherwise address fraud, crime, security or technical issues.

Anora may provide your personal data to authorized service providers who perform services for Anora (including service providers providing data storage, accounting and consultancy services). Euroclear Finland Ltd and Inderes Ltd process personal data as Anora's authorized service providers as described in section 2.3.

If Anora is involved in a merger, acquisition or asset sale, Anora may provide your personal data to a third party involved (including such third party's consultants and advisors), to the extent necessary for the purposes of planning and executing the merger, acquisition or asset sale.

2.1.5. Storing of the data

Anora will store the data entered into the register until the purposes set out in this privacy notice have been fulfilled, unless any legislation sets an obligation to store the data longer.

2.1.6. Principles for the protection of the register

Anora aims to protect the personal data with appropriate actions, taking into consideration the nature of the personal data. These actions and procedures are, as necessary, the use of firewalls and secure server rooms,

encryption, implementing appropriate systems and processes for the management of user rights, careful selection of the processors of the data and other actions technically and commercially reasonable to ensure the appropriate protection of the personal data from authorized use or disclosure.

3. YOUR RIGHTS

A shareholder or other data subject whose personal data is processed pursuant to this privacy notice has, as allowed by the legislation, the following rights regarding the his/her personal data:

- **Right of access to data** – A shareholder or other data subject has the right to access his/her personal data processed by Anora.
- **Right to rectify data** – A shareholder or data subject has the right to request Anora to rectify any inaccurate or incorrect personal data and to complete any incomplete data.

A shareholder or other data subject also has all other rights provided by the applicable data protection legislation, such as the right to request the restriction of the processing, the right to object the processing and the right to request the erasure of the personal data.

The requests to use the above rights must be presented in writing and with sufficient specificity by either email to dataprivacy@anora.com or to the contact person nominated above in this privacy notice.

In addition to the foregoing rights, a data subject has the right to lodge a complaint to the relevant data protection authority. More information can be received from the local data protection authority, in Finland from the Office of the Data Protection Ombudsman (<https://tietosuoja.fi/en/home>).

4. UPDATES

Anora may update this privacy notice upon any changes to data protection principles. Any updates will be announced on Anora's website.