

PRIVACY STATEMENT

This privacy statement describes the processing of personal data related to Anora Group Plc's Annual General Meeting.

Updated on 20 March 2024.

1 CONTROLLER AND CONTACT INFORMATION

Name	Anora Group Plc
Address	Kaapeliaukio 1, 00180 Helsinki
Business ID	1505555-7
Phone number	+358 207 013 013
Contact person	Sara Tuomala
Contact details	Kaapeliaukio 1, 00180 Helsinki, dataprivacy@anora.com

2 NAME OF THE REGISTER

Anora Group Plc's register of general meetings

3 THE PURPOSE AND LEGAL BASIS FOR PROCESSING PERSONAL DATA

The purpose of processing personal data is to enable carrying out the General Meeting of the controller in accordance with the law.

Personal data are processed only for the purposes necessary for the organisation of the General Meeting, such as to verify the identity of the registrant and their right to participate, preparing a list of participants, a list of votes and possible voting tickets, organizing any voting, including advance voting, and manage possible questions and requests to be heard and arranging and documenting the General Meeting, including arranging a webcast to shareholders, who have registered for the General Meeting.

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. The list of shareholders is maintained by Euroclear Finland Oy. Inderes Oyj is responsible for the General Meeting service in its entirety. In addition, other service providers are used when needed.

Processing of personal data is based on the legal obligations of the controller, which are based on the obligations for the organizing of General Meetings set out in the Companies Act (624/2006, as amended) and other legislation binding on the controller. 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 General Meeting is a mandatory statutory requirement. Furthermore, the legal basis for the processing of personal data is the controller's legitimate interests to organize the Annual General Meeting, including organizing the opportunity for shareholders to follow the Annual General Meeting via webcast.

4 PROCESSED PERSONAL DATA

The processed personal data include the shareholder's and their possible proxy's name, personal identity number and/or business ID, address, contact details, number of shares and votes, voting information, authentication method, basis of representation, date of registration, and possible information on aid, power of attorney, preliminary questions, and any additional information provided in connection with the registration.

When participating in the General Meeting, the time of arrival and departure of each participant are recorded. For technical maintenance and monitoring of the service, log data on registration and voting, as well as the user's IP address are also recorded.

The register contains the list of shareholders on the record date created by Euroclear Finland Oy for the General Meeting, containing, e.g., the shareholder's name, personal identity number/business ID, address, and number of shares.

The register contains a temporary list of shareholders created by Euroclear Finland Oy for the General Meeting, containing information on nominee registered shareholders registered for the General Meeting and their number of shares.

5 REGULAR SOURCES OF DATA

Personal data is mainly collected from the shareholder themselves or from their representative in connection with the registration to the General Meeting. When registering via e-mail, mail or telephone, the controller or Innovatics Ltd enters the registrant's personal data and 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.

6 DISCLOSURES AND TRANSFERS OF PERSONAL DATA

Based on the information in the register, a list of votes and a summary of the votes cast are established and attached to the minutes of the meeting. The list of votes contains information on the name of the shareholder and possible proxy and/or aid, number of the vote ticket (participant number), number of shares by share class, number of votes, basis of representation and means of attendance.

At the General Meeting, in accordance with the Companies Act, the shareholder register is made available, which includes the names of shareholders, municipality, and the number of shares and votes according to the record date of the meeting. The list also contains information on nominee registered shareholders who are temporarily registered in the list of shareholders for the General Meeting.

7 TRANSFER OF DATA TO THIRD PARTIES AND OUTSIDE THE EU OR THE EUROPEAN ECONOMIC AREA

The data contained in the register may be shared with third parties involved in organizing the General Meeting who need the registered data in their operations. Data is not disclosed for commercial purposes.

The controller may share your personal data with third parties outside the controller'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.

The controller may provide your personal data to authorized service providers who perform services for the controller (including service providers providing data storage, accounting and consultancy services). Euroclear Finland Oy and Innovatics Ltd process personal data as the controller's authorized service providers.

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

Otherwise, personal data is not transferred or disclosed outside the EU or the European Economic Area.

If the controller is involved in a merger, acquisition or asset sale, the controller 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.

8 BASIS FOR REGISTER PROTECTION

Physical material is stored in a locked room accessible only to persons entitled to the data.

Electronic material is stored in a data room that meets the requirements for the processing of personal data. The connection from the user's browser to the server is encrypted. Access to the register is limited to the employees of the controller and subcontractors who need and process data to organize the General Meeting.

9 STORAGE AND DELETION OF PERSONAL DATA

Innovatics Ltd stores personal data for a maximum of two years after the end of the General Meeting.

Euroclear Finland Oy stores personal data for a maximum of four months after the end of the General Meeting.

The minutes of the General Meeting and the list of votes attached thereto are stored permanently. It includes the names of shareholders who participated in the General Meeting, the names of potential proxies and aids, the number of shares and votes, and the numbers of the voting tickets.

Other data is destroyed when it is no longer necessary to draw up the minutes or to verify their accuracy.

10 RIGHTS OF THE DATA SUBJECT

The data subject has the right to know the data stored about them in the register. The data subject has the right to request rectification, deletion or complementing of their 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 to the extent that the processing of the data is based on the legitimate interests of the controller 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 in Section 1.

The data subject has the right to lodge a complaint with the Data Protection Ombudsman if they have objections to the processing of personal data. The instructions are found on the website of the Data Protection Ombudsman at <https://tietosuoja.fi/>