

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, dataprivacy@anora.com.

2 PROCESSING OF PERSONAL DATA

2.1 Purposes and legal basis 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 19 April 2023 and the confirmation of the registrant's identity and that they have the right to participate;
- 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, including advance voting; and
- c) arranging and documenting the Annual General Meeting, including arranging a webcast to shareholders, who have registered for the Annual General Meeting.

The participation list, which will be formed 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.

The technical provider of the registration system and advance voting is Innovatics Ltd. The shareholder's register is maintained by Euroclear Finland Oy.

The legal basis 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. Furthermore, the legal basis for the processing of personal data is Anora's legitimate interests to organize the Annual General Meeting, including organizing the opportunity for shareholders to follow the Annual General Meeting via webcast.

2.2 Processed personal data and sources of information

Personal data is collected primarily from the data subjects themselves, i.e., the shareholders registering to the Annual General Meeting or parties acting on their behalf, such as assistants and proxy representatives.

The processed personal data consist of the following data:

- name, personal identification number, address, phone number, email address
- book-entry account number and number of shares and votes

- name, personal identification number and any other necessary information of the possible assistant or proxy representative, including their basis of representation
- information related to exercising shareholder rights, such as questions and voting information
- manner of identification
- any additional information provided in connection with the registration

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.

In addition, the time at which participants arrive at the webcast and depart will be recorded. Log information regarding the registration as well as the user's IP address will also be recorded for the purposes of technical maintenance and monitoring of the service.

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

Personal data is shared to such third parties who are involved in the organization of the Annual General Meeting, and who require the data to fulfil their responsibilities. Personal data is not disclosed for commercial purposes.

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 Innovatics Ltd process personal data as Anora's authorized service providers.

Text messages to persons to be attending the Annual General Meeting will be sent by a Swiss service provider. By decision of the European Commission, Switzerland is considered to ensure an adequate level of data protection. Otherwise, no personal data is disclosed or transferred outside the EU/EEA.

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.

2.4 Storing of the data

The personal data will be stored as long as it is necessary to fulfil the purposes as set out in this privacy notice and to comply with retention periods that are laid down in applicable legislation, such as the Companies Act. The names of the shareholders, who attended the Annual General Meeting, the names of possible assistants and proxy representatives, the number of shares and votes as well as numbers of ballots are included in the minutes of the Annual General Meeting. The minutes and its appendices will be stored throughout the operational life of Anora in order to comply with Anora's statutory obligations or a minimum of ten years after the end of the financial year.

Innovatics retains the personal data for a maximum of one year from the closing of the Annual General Meeting.

Euroclear Finland Oy retains the personal data for four months from the closing of the Annual General Meeting.

2.5 Principles for the protection of the personal data

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 AS A DATA SUBJECT

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 their personal data:

- **Right of access to data** — A shareholder or other data subject has the right to be informed of whether their personal data is being processed and, if so, the right to access their 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 to the extent that the processing of the data is based on the legitimate interests of Anora 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 processing activities. Any updates will be announced on Anora's website.