



# Privacy Notice – Annual General Meeting

1. Data Controller	<p>Posti Group Corporation (company ID: 1531864-4)</p> <p>Posti Group Corporation and its subsidiaries are joint data controllers for the personal data they process and share together. Posti Group Corporation and its subsidiaries share the responsibilities and obligations of a data controller among themselves in a manner they deem appropriate based on the relevant circumstances. Generally, Posti Group Corporation is responsible for (i) the group's data protection and IT policies, guidelines, and instructions, (ii) data protection and security requirements and practices for IT systems and services, and (iii) ensuring that group-level personal data registers and processing activities comply with applicable data protection laws. Meanwhile, the subsidiaries are responsible for (i) the accuracy, precision, and completeness of personal data in group-level personal data registers and processing activities, and (ii) ensuring that their own personal data registers and processing activities comply with applicable laws according to Posti Group Corporation's instructions. They are also responsible for (i) the accuracy, precision, and completeness of personal data in systems, and (ii) ensuring that local personal data registers, systems, and processes comply with applicable local and EU laws.</p> <p>For more information on Posti Group Corporation's subsidiaries and jointly controlling entities contact Posti Group Corporation. Regardless of the applicable data controller in each situation, you can always use your rights by contacting Posti Group Corporation:</p> <p>Posti Group Corporation ("Posti") P.O. Box 1, FI-00011 POSTI, Finland</p> <p>Visiting address: Mannerheiminaukio 1A FI-00100, Helsinki, Finland <a href="mailto:tietosuoja@posti.com">tietosuoja@posti.com</a></p> <p>In all questions and matters relating to personal data processing or rights of the data subject, data subjects should contact the data controller at <a href="mailto:tietosuoja@posti.com">tietosuoja@posti.com</a>.</p>
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<p>2. Lawfulness and purposes of the personal data processing</p>	<p>The primary legal ground for processing shareholders' personal data is a compliance with a legal obligation in accordance with the Finnish Companies Act (624/2006) to which Posti as a data controller is subject. The main examples of data processing on this ground include:</p> <ul style="list-style-type: none"> <li>• fulfilling the legal obligation to maintain a shareholder register;</li> <li>• organising and administering the Annual General Meeting and any Extraordinary General Meetings, including the shareholder registrations and voting;</li> <li>• executing and administrating dividend payments and other equity transactions ; and</li> <li>• maintaining identification of shareholders and information about proxy representatives and power of attorney.</li> </ul> <p>The purpose or personal data processing is the administration of the Annual General Meeting and to enable shareholders of Posti to register for the Annual General Meeting.</p> <p>The enabling of the registrations for the Annual General Meeting on the Internet shall require the collection of personal data of the shareholders of Posti to the shareholder to identify himself/herself for the registration and for Posti to ascertain data subject's identity and right to attend the meeting and the ownership of shares of the shareholder. Through the same service the shareholder can authorize a proxy representative by making an electronic authorization.</p> <p>The list of shareholders is maintained by Euroclear Finland Oy. The technical implementation of the registration system, Annual General Meeting Hall bookkeeping and possible advance voting and/or possible voting during the Annual General Meeting is carried out by Innovatics Oy. Inderes Oyj is responsible for the Annual General Meeting service in its entirety. In addition, other service providers are used when needed.</p> <p>The legal basis for processing the personal data is Posti's legal obligations under the Finnish Companies Act, Securities Markets Act and possible other applicable regulation.</p> <p>Legitimate interest is the legal ground when providing shareholders with information and communication as well as communication routes relevant to them. Shareholder can authorize a proxy representative by making an electronic authorization.</p>
<p>3. Personal data content processed</p>	<p>For the purpose of the Annual General Meeting administration and registration the following personal data shall be processed: personal identity number, birth date, company ID, address, phone number, e-mail address, and number of shares and votes. The data collected on the proxy include name, personal identity code, address, phone number, email</p>

	<p>address and basis of representation. In addition, the following personal data is processed in relation to the Annual General Meeting administration and registration: voting data, means of identification, date of registration, possible information on the assistant, time of arrival to and time of leaving from the meeting, possible other information provided in connection with the registration, and the user's IP address.</p> <p>Innovatics Oy saves the data log created in the registration page and may use it for monitoring, ensuring the service and statistics.</p>
<p>4. Regular sources of personal data</p>	<p>When registering to the meeting the shareholder shall provide all the data collected about himself/herself. By a given personal identity number, the system shall compare the data given with the shareholders' register of Posti maintained by Euroclear Finland Oy and extract the ownership information from the shareholders' register. Information may also be collected directly from shareholders, guardians and proxy representatives.</p> <p>When registering via e-mail, mail or telephone, the controller or Innovatics Oy enters the registrant's personal data and advance votes into the register. Based on the personal data provided in connection with the registration, Innovatics Oy retrieves the number of shares of the shareholder on the record date from the list of shareholders created by Euroclear Finland Oy. Innovatics Oy enters the voting instructions for nominee registered shareholders represented by account operators at the Annual General Meeting into the register.</p> <p>When making the electronic authorization, the shareholder shall also enter the necessary personal data of the proxy representative.</p>
<p>5. Retention of personal data</p>	<p>Euroclear Finland Oy shall retain the personal data for four (4) months from the end of the Annual General Meeting.</p> <p>Innovatics Oy stores personal data for a maximum of two (2) years after the end of the Annual General Meeting.</p> <p>Inderes Oyj stores personal data for six (6) months.</p> <p>A list of participants will be annexed to the minutes of Posti's Annual General Meeting including names, ballot number, number of shares and votes and share class. Posti shall retain the minutes and annexes as set forth in statutory obligations. The minutes may include personal data such as names of those who were present, information about voting and number of shares.</p> <p>Data in the manual records maintained by Posti are retained for pre-defined time periods which is usually ten (10) years.</p>

<p>6. Data transfers outside the EU or EEA and regular data disclosures to third parties</p>	<p>Posti may transfer and disclose personal data to third parties as follows:</p> <ul style="list-style-type: none"> <li>• to the provider of the system for the registration for the Annual General Meeting, Euroclear Finland Oy, and other trusted service providers who act on Posti's behalf, when needed;</li> <li>• within the Group; and</li> <li>• when the disclosure is necessary to ensure the rights of Posti, data subject or others, to investigate potential fraud, or to respond to requests from public authorities.</li> </ul> <p>The personal data will not be transferred by Posti outside the European Union or the European Economic Area. The Company will not disclose the data given for any direct marketing purposes.</p> <p>For recipients with Finnish phone numbers, text messages are sent via a Finnish service provider. For those with other than Finnish phone numbers, text messages are sent using a Swiss service.</p> <p>Personal data that will be available to all registered persons during the Annual General Meeting include shareholder's name, city, sector, share class, number of share and number of votes. This data is available only under the supervision of the meeting personnel during the Annual General Meeting either through terminal devices or manually, but they cannot be printed nor transferred from the meeting.</p> <p>If the shareholder has security ban and he/she has informed the data controller of his/her security ban, the contact information of the shareholder entered in the data controller's shareholder list is only disclosed to the authority.</p> <p>Where applicable, Posti may rely on the applicable legal framework for the transfer of data to the United States.</p>
<p>7. Security measures</p>	<p><b>Manual register</b> The data shall be stored in an area with a restricted access, available only for the authorized persons.</p> <p><b>Shareholders register/ADP register</b> Security of the register is managed by Euroclear Finland Oy. Data in the application is protected from any unauthorized changes or accesses. If the shareholder registers in advance on the Internet, the connection from the user's browser to the server of Euroclear Finland Oy is encrypted with SSL-technology.</p> <p><b>Annual General Meeting register</b> Security of the register is managed by Innovatics Oy. Electronic material is stored in a data room that meets the requirements for the processing of</p>

	<p>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 Innovatics Oy and Inderes Oyj and subcontractors who need and process data to organise the Annual General Meeting.</p>
8. Rights of data subjects	<p>Shareholders have the following rights according to the applicable data protection legislation:</p> <ul style="list-style-type: none"><li>• shareholder is entitled to obtain information on the personal data concerning him/her which Posti is processing and obtain a copy of such personal data.</li><li>• shareholder is also entitled to request for the rectification, removal or supplementing of his/her personal data.</li></ul> <p>Shareholders who wish to exercise their rights can contact Posti via the contact details set in Section 1 of this Privacy Notice.</p> <p>Posti is entitled to decline requests on statutory grounds. Posti shall inform the data subject of such a decline including the grounds for the decline.</p> <p><b>Right to lodge a complaint</b></p> <p>The data subject is entitled to lodge a complaint to the Office of the Data Protection Ombudsman (<a href="http://www.tietosuoja.fi">www.tietosuoja.fi</a>) or other competent data protection authority should they have concerns or remarks regarding Posti's processing of personal data.</p>