

# PRIVACY STATEMENT

This privacy statement describes the personal data processing related to Sanoma Corporation's Annual General Meeting.

Date of drafting 5 February 2024

1. Controller	Sanoma Corporation Töölönlahdenkatu 2 FI-00100 Helsinki Finland tel. +358 105 1999
2. Contact person	Paralegal Päivi Alkki Sanoma Corporation P.O. Box 60, FI-00089 Sanoma Töölönlahdenkatu 2, FI-00100 Helsinki, Finland tel. +358 40 359 0461 E-mail: forename.surname@sanoma.com
3. Purpose and legal basis for processing personal data	<p>The purpose for processing personal data is to enable carrying out the General Meeting of the controller in accordance with the law, including enabling shareholders of Sanoma Corporation to register for and vote in advance in the Annual General Meeting.</p> <p>The personal data is also processed to verify the person's identity, shareholding and his/her right to attend and vote in advance in the general meeting. The data is also used to organise the possible chat function and to print the list of participants and list of votes of the general meeting as well as to organise the advance voting and voting, including preparing the possible voting tickets and managing possible questions and requests to be heard. A list of participants, compiled in accordance with this statement, will be annexed to the minutes of the general meeting.</p> <p>Inderes Oyj is responsible for the General Meeting service in its entirety. 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. In addition, other service providers are used when needed.</p> <p>The legal basis for processing the personal data is Sanoma Corporation's legal obligations (the Finnish Companies Act and the Finnish Securities Markets Act).</p>
4. Data subjects and content of the register	<p>The data subjects are the shareholders, holders of nominee-registered shares and the proxy representatives.</p> <p>When a shareholder registers via Internet, the technical implementation of data collection is conducted by Innovatics Ltd. The telecommunications connection from the user's browser to the server of Innovatics Ltd is encrypted with SSL. The following personal data is collected through this service: name of the shareholder and their possible proxy, personal identity code and/or business ID, address, telephone number, email address, 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</p>

	<p>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.</p> <p>When registering by other means, the shareholder's personal data described above is entered into the system, maintained by Innovatics Ltd, by the controller or Innovatics Ltd.</p> <p>The number of shares and votes in the general meeting is based on Sanoma Corporation's shareholder register maintained by Euroclear Finland Ltd, which includes, e.g., the following information: name, personal identity code/business ID, address, nationality, information on any joint ownerships and number of shares.</p> <p>The register contains a temporary list of shareholders created by Euroclear Finland for the General Meeting, containing information on nominee registered shareholders registered for the General Meeting and their number of shares.</p>
<p>5. Regular sources of information</p>	<p>Personal data is mainly collected from the shareholder themselves or from their representative in connection with the registration to the General Meeting.</p> <p>When registering via the Internet, the shareholders enter themselves the personal data about himself/herself into the registration system.</p> <p>The proxy representatives enter the necessary personal data of the shareholder, who has authorised the proxy, also into the system.</p> <p>Based on the personal identity code/business ID entered, the system compares the information with Sanoma Corporation's shareholder register maintained by Euroclear Finland Ltd.</p> <p>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.</p> <p>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.</p> <p>Innovatics Ltd enters the voting instructions for nominee registered shareholders represented by account operators at the General Meeting into the register.</p>
<p>6. Disclosures of personal data</p>	<p>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.</p> <p>At the general meeting, in accordance with the Limited Liability 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.</p>
<p>7. Data transfers and data disclosures outside the EU or the European Economic Area</p>	<p>The personal data will not be disclosed to third parties or, as a general rule, transferred outside the EU and/or the European Economic Area. 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.</p> <p>Following information of registration and shareholding are available to all registered persons during general meeting: shareholder's name, home municipality, number of shares and number of votes.</p>

	Information is only available supervised during the general meeting either through terminal devices or manually and they cannot be printed or transferred from the meeting.
8. Security measures	<p>Innovatics Ltd is responsible for the technical maintenance of the register. The connection from a user's browser to the server is encrypted with SSL technology. The personal data is protected by technical and organisational measures against accidental and/or unlawful access, alteration and destruction or other processing including unauthorised disclosure and transfer of personal 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 organise the General Meeting.</p> <p>Physical material is stored in a locked room accessible only to persons entitled to the information.</p>
9. Retention and deletion of personal data	<p>The personal data is retained for a maximum of twenty-four (24) months from the end of the general meeting. The data retention may also be extended if necessary for establishment, exercise or defence of legal claims.</p> <p>A list of participants will be annexed to the minutes of Sanoma Corporation's general meeting. The list includes names, number of shares and votes and share class. Sanoma Corporation retains the minutes and annexes throughout the operational life of the company in order to comply with the statutory obligations.</p> <p>Euroclear Finland Oy stores personal data for a maximum of four months after the end of the General Meeting.</p> <p>Other data is destroyed when it is no longer necessary to draw up the minutes or to verify their accuracy.</p>
10. Data subjects' rights	<p>After providing the necessary details for identification, shareholders have the right to get a confirmation whether or not the register in question contains personal data about him/her and information of what personal data is contained in the register.</p> <p>Shareholders also have the right to request for the rectification, erasure or supplementing of his/her personal data. The controller is obligated to fulfil the request without undue delay in case the register contains data that is false, unnecessary, insufficient or outdated in terms of the purposes of the processing. In case an inaccuracy or mistake can be corrected by Euroclear Finland Ltd or Innovatics Ltd, the controller shall forward the requests to Euroclear Finland Ltd and/or Innovatics Ltd. The controller is not able to rectify false information coming, for example, from the account operator of the shareholder.</p> <p>Shareholders who wish to exercise his/her rights, as referred to above, shall make a request to this effect to the contact person in charge at Sanoma Corporation, by a personally signed or otherwise comparably verified document.</p>
11. Right to lodge a complaint with the local data protection authority	The shareholders have a right to lodge a complaint with the Finnish Data Protection Authority ( <a href="http://www.tietosuojafi.fi">www.tietosuojafi.fi</a> ) should they have concerns or remarks regarding the data processing described in this privacy statement.