

# PRIVACY STATEMENT

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

Date of drafting 1 February 2021

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| 1. Controller                                           | Sanoma Corporation<br>Töölönlahdenkatu 2<br>FI-00100 Helsinki<br>Finland<br>tel. +358 105 1999                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 2. Contact person                                       | Paralegal Päivi Alkki<br>Sanoma Corporation<br>P.O. Box 60, FI-00089 Sanoma<br>Töölönlahdenkatu 2, FI-00100 Helsinki, Finland<br>tel. +358 40 359 0461<br>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 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. A list of participants, compiled in accordance with this statement, will be annexed to the minutes of the general meeting.</p> <p>The technical provider of the registration system is Innovatics Ltd. The provider of the possible chat functionality will be Inderes Ltd. The shareholder register is maintained by Euroclear Finland Ltd.</p> <p>The legal basis for processing the personal data is Sanoma Corporation's legal obligations (the Finnish Companies Act and Securities Markets Act).</p>                                                                                                                                                                                                                                                                                                                                                                          |
| 4. Data subjects and content of the register            | <p>The data subjects are the shareholders and proxy representatives.</p> <p>When a shareholder registers via Internet, the technical implementation of data collection is taken care of 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, personal identity number/business ID, telephone number, email address and number of shares and votes. Also, the name, personal identity number and basis of representation of the possible proxy representatives and possible proxy attachments are collected through the registration service. Furthermore, votes registered by and possible questions, in advance, from the participant are collected through the service. For the technical maintenance and monitoring of the service, the authentication method and user's IP address are also collected.</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 among other things, consists of the following information: name, personal identity</p> |

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|                                                                             | number/business ID, address, nationality, information on any joint ownerships and number of shares.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 5. Regular sources of information                                           | <p>When registering via the Internet, the person registering enters 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, into the system.</p> <p>Based on the personal identity number/business ID entered, the system compares the information with Sanoma Corporation's shareholder register maintained by Euroclear Finland Ltd.</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>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 6. Data transfers outside EU or European Economic Area and data disclosures | The personal data will not be disclosed to third parties or, as a general rule, transferred outside EU and/or European Economic Area. The confirmation text messages, that contain the name of the shareholder are sent through a Swiss service.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 7. Security measures                                                        | <p>Innovatics Ltd shall be 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.</p> <p>The manual data shall be stored in an area with restricted access, available only for the authorised persons.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 8. Retention and deletion of personal data                                  | <p>The personal data is retained for a maximum of six (6) months from the end of the general meeting. Additionally, the data retention may 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>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 9. Data subjects' rights                                                    | <p>After providing the necessary details for identification, the shareholder shall 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>The shareholder also has the right to request for the rectification, erasure or supplementing of his/her personal data. The controller shall 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>The shareholder who wishes to exercise his/her rights, as referred to above, shall make a request to this effect to Päivi Alkki, the contact person in charge at Sanoma Corporation, by a personally signed or otherwise comparably verified document.</p> |
| 10. 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.tietosuoja.fi">www.tietosuoja.fi</a> ) should they have concerns or remarks regarding the data processing described in this privacy statement.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |