

Alma Media Corporation's Annual General Meeting register

Privacy Notice

Please note that this is an unofficial translation presented only for informative purposes.

This data protection description documents the processing of personal data related to Alma Media Corporation's Annual General Meeting.

Controller

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Contact

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Purpose and basis for the processing of personal data

The purpose of processing personal data is to enable the conduct of the controller's Annual General Meeting in compliance with the law. The processing of personal data includes the registration and voting of shareholders at the Annual General Meeting. The data is used to compile the meeting's list of participants, ballots and list of votes as well as the management of advance votes and requests to speak at the meeting.

Innovatics Oy is responsible for the technical implementation of the registration and advance voting system of the Annual General Meeting. The list of shareholders is maintained by Euroclear Finland Oy.

The processing of personal data is based on the controller's legal obligations.

Data contained in the register

The register contains the name of the shareholder who has registered for the Annual General Meeting along with their personal identity code, contact details and date of registration as well as information on their proxy, assistant and power of attorney, if any, and any additional information potentially provided in connection with registration. Log data will be recorded in the register on registration and voting. In addition, the meeting participants' time of arrival and time of departure from the meeting will be recorded.

The register contains a list of shareholders on the record date, compiled by Euroclear Finland. The list includes each shareholder's name, personal identity code or business ID, address and the number of shares held.

The register also contains a temporary list of shareholders, compiled by Euroclear Finland, on nominee-registered shareholders who have registered for the Annual General Meeting.

Sources of information

At the time of registration, the shareholder's information will be collected along with their advance votes. Where proxies are used, the proxy enters the personal data and advance votes of the shareholder they represent in the system.

For data subjects who register by e-mail or post, the controller or Innovatics Oy will enter the data subject's personal data and advance votes in the register.

Based on the provided personal identity code or business ID, the system retrieves information on the number of shares held by the shareholder from the list of shareholders on the record date, compiled by Euroclear Finland Oy.

Voting instructions for nominee-registered shareholders represented at the Annual General Meeting by an asset manager will be entered in the register by Innovatics Oy.

Information disclosures

Based on the register data, the Annual General Meeting's list of participants will be compiled along with voting summaries, which will be appended to the minutes of the meeting.

At the Annual General Meeting, a list of shareholders will be displayed in accordance with the Limited Liability Companies Act. The list will contain the shareholders' names, municipalities of residence and their number of shares and votes as at the record date. The list will also contain information on nominee-registered shareholders who have been temporarily registered on the list of shareholders for the Annual General Meeting.

Disclosure of data to third parties and outside the EU or EEA

Data in the register may be disclosed to third parties that participate in organising the Annual General Meeting and require access to the register data in their operations. The data shall not be disclosed for commercial purposes.

Text messages to the data subjects shall be sent via a Switzerland-based service. Other than that, no data shall be disclosed to or transferred to parties outside the EU or EEA.

Protection of the register

Physical materials shall be stored in a locked space that can only be accessed by those who are authorised to access the data.

Electronic materials shall be stored in a data centre that meets the requirements set for the processing of personal data. Data connections from the user's browser to the server are encrypted. Access to the register shall be limited to a restricted group of employees of the controller and the controller's subcontractors who require access to the data for the purpose of organising the Annual General Meeting.

Retention and erasure of personal data

Innovatics Oy shall retain the personal data for at most one year after the end of the Annual General Meeting.

Euroclear Finland Oy shall retain the personal data for at most four months after the end of the Annual General Meeting.

The Annual General Meeting's list of participants shall be retained permanently. The list of participants contains the names of the shareholders who participated in the Annual General Meeting along with the names of any proxies and assistants, their number of shares and votes and their ballot numbers.

Other data shall be erased when it is no longer necessary for the purpose of drawing up the minutes of the meeting or verifying the accuracy of the information contained therein.

Data subject's rights and exercising them

Data subjects have the right to be informed of what data has been recorded in the register concerning them. Data subjects have the right to request the rectification, erasure or amendment of data concerning them. Any requests should be directed to the aforementioned representatives of the controller.

The right to lodge a complaint with the supervisory authority

Data subjects have the right to lodge a complaint with the Data Protection Ombudsman if they have any grievances pertaining to the processing of data.

Drafted 11 February 2021