

## Privacy statement

This privacy statement describes the processing of personal data related to Sampo plc's General Meeting.

### 1. Controller and contact information

Sampo plc  
Fabianinkatu 21, 00130 Helsinki  
0142213–3

**Contact person:**

Legal Counsel Matias Nurminen  
matias.nurminen@sampo.fi

### 2. The purpose and legal basis for processing personal data

The purpose of processing personal data is to enable carrying out the General Meeting of the controller in accordance with the law.

Personal data are processed only for the purposes necessary for the organisation of the General Meeting, such as to verify the identity of the registrant and their right to participate, preparing a list of participants, a list of votes and possible voting tickets, organizing any voting, and manage possible questions and requests to be heard.

The processing of personal data is also necessary to organize the webcast for shareholders based on the legitimate interest of the data controller, in accordance with the General Data Protection Regulation.

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 Oy. Innovatics Oy saves the data log created when using the registration web page and may use such data for monitoring purposes, for ensuring the reliability of the service and for user statistics. The list of shareholders is maintained by Euroclear Finland Oy. Inderes Oyj is responsible for the General Meeting service in its entirety. In addition, other service providers are used when needed.

Processing of personal data is based on the legal obligations of the controller.

### 3. Processed personal data

The processed personal data include the shareholder's and their possible proxy's name, personal identity number and/or business ID, address, contact details, 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 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.

The processed data includes the list of shareholders on the record date created by Euroclear Finland for the General Meeting, containing, e.g., the shareholder's name, personal identity number/business ID, address, and number of shares.

The processed data includes 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.

#### **4. Regular sources of data**

Personal data is collected from the shareholder themselves or from their representative, mainly in connection with the registration for the General Meeting. When registering via e-mail, mail or telephone, the data controller or Innovatics Oy enters the registrant's personal data and advance votes into the General Meeting system.

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.

Innovatics Oy enters the voting instructions for nominee registered shareholders represented by account operators at the General Meeting into the General Meeting system.

#### **5. Disclosures and transfers of personal data**

The personal data is processed for the implementation of the General Meeting by Inderes Oyj, the General Meeting service provider, Innovatics Oy, the technical implementer of the General Meeting system, and Flik Oy, the implementer of the General Meeting webcast, in addition to Sampo plc.

Based on the processed personal data, 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.

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. This information is available only through terminal devices located on site of the General Meeting and cannot be printed or otherwise transferred from these devices.

## **6. Transfer of data to third parties and outside the EU or the European Economic Area**

The processed personal data may be shared with third parties involved in organising the General Meeting who need the processed data in their operations. Data is not disclosed for commercial purposes.

For recipients with Finnish phone numbers, text messages are sent via a Finnish service provider. For those with foreign numbers, text messages are sent using a Swiss service. Switzerland has been recognised by the European Commission as providing an adequate level of data protection, and accordingly, no specific additional transfer safeguards are required for transfers to Swiss service providers.

If it's possible to use the right to speak virtually in the General Meeting, the right to speak will be enabled by a US service provider<sup>1</sup>. In this case, the aforementioned service provider processes the IP address and name of the person using the right to speak.

If personal data is transferred outside of the European Economic Area, an adequate level of data protection is ensured in accordance with the requirements of the GDPR by complying with the adequacy decisions issued by the European Commission or using Standard Contractual Clauses adopted by the European Commission and, where necessary, by implementing supplementary safeguards.

## **7. Basis for the protection of the personal data**

Physical material is stored in a locked room accessible only to persons entitled to the 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 General Meeting records is limited to the employees of the data controller and subcontractors who need and process data to organise the General Meeting.

## **8. Storage and deletion of personal data**

Innovatics Oy stores personal data for a maximum of two years after the end of the General Meeting.

Euroclear Finland Oy stores personal data for a maximum of four months after the end of the General Meeting.

A list of participants and votes will be annexed to the minutes of the General Meeting. The list of participants and votes includes the name of the shareholder, number of the ballot and details on ownership (number of shares and votes as well as share class). The minutes and its annexes will be stored throughout the operational life of the company, however, for at least 10 years after the end of the financial year, in order to comply with the company's statutory obligations.

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<sup>1</sup> Read more about how Daily's data security and GDPR compliance: <https://www.daily.co/security/gdpr/> and <https://www.daily.co/products/security-at-daily/>

Other data is destroyed when it is no longer necessary to draw up the minutes or to verify their accuracy.

## **9. Rights of the data subject**

Any request regarding the rights of the data subject shall be addressed in writing to the contact person mentioned in Section 1 above.

The data subject has the right to be informed about the processing of their personal data, the right to inspect personal data held about them, and the right to request the rectification of inaccurate data.

The data subject has the right to request the erasure of personal data concerning them. This right is not absolute and may be limited where processing is based on a legal obligation, in which case the controller may be required to retain the data notwithstanding such request.

The data subject has the right to object to or request restriction of the processing of their personal data. Where processing is based on a legal obligation, the right to object does not apply. The right to restrict processing may, however, still apply in certain circumstances, for example where the data subject contests the accuracy of the data.

The data subject has the right to lodge a complaint with the Data Protection Ombudsman if they have objections to the processing of personal data. The instructions are found on the website of the Data Protection Ombudsman at [tietosuoja.fi](https://tietosuoja.fi).