



# Kesko Data Protection Policy

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Approval date	18 December 2025
Approved by	Board of Directors of Kesko Corporation
Owner	K Legal and Sustainability
Reviewed by	K Legal and Sustainability
Review date	by 1 January 2028
Replacing	Replaces the Kesko's Data Protection Policy approved by the Board of Directors on 17.12.2020



## KESKO DATA PROTECTION POLICY

### Introduction

This document describes the objective and key principles of Kesko Group's ("Kesko") data protection policy, as well as responsibilities and organization.

K Code of Conduct is always followed in addition to this Policy.

Kesko is committed to complying with all laws and regulations applicable to our operations. Kesko's policies and procedures are designed to meet the requirements of the EU General Data Protection Regulation (GDPR) and the data protection legislation in force in the countries where we operate.

The data protection policy serves as the foundation for data protection practices and guidelines, which specify the provisions given in the policy and guide their practical application.

Data protection is closely linked to information security. The principles of information security are defined in Kesko's information security policy.

Data protection management is an essential part of Kesko's risk management. Kesko regularly identifies and assesses data protection risks and implements necessary measures to control them. This includes, among other things, data protection audits, risk assessments, and continuous monitoring. For information security, Kesko's information security policy and its defined objectives are followed.

This policy applies to the operations of Kesko Group companies in all countries where Kesko operates. Kesko Group personnel must comply with the policy.

### Policy objective

Kesko is committed to maintaining a high level of data protection and privacy. Protecting personal data is a central part of our operations. The objective of the data



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protection policy is to ensure that the principles, practices, and responsibilities for lawful processing of personal data and a high level of data protection are carried out at Kesko.

## Key principles

**K Code of Conduct:** Our data protection policy adheres to the K Code of Conduct, which guides all our activities and decision-making. These principles include lawful conduct, responsibility, respect, and fairness. Our data protection practices support these principles by ensuring that personal data processing is transparent, secure, and lawful.

**Protection of Personal Data:** We strive to protect all personal data in our possession based on risk by implementing strong security measures and following best practices in data protection. This includes ensuring the confidentiality, integrity, and availability of data.

**Transparency and Responsibility:** We aim to be transparent about how we collect, use, and share personal data. We regularly review and update our data protection practices to ensure their effectiveness and compliance with the law.

**Rights of Individuals:** We respect individuals' rights to access their data, correct and delete their data, and, in certain cases, restrict or object to processing or transfer data to another controller. We provide clear and easily accessible information about these rights and how they can be exercised.

**Promoting Data Protection Culture:** Kesko has a data protection compliance program aimed at systematically promoting a data protection culture in our organization by providing regular training and internal communication to our employees. We strive for a proactive approach to data protection and encourage our staff to take responsibility for protecting personal data.

**Continuous Improvement:** We are committed to continuously improving our data protection practices. We regularly assess our policy, other guidelines, procedures, and technologies to identify areas for improvement and ensure that we maintain a risk-appropriate level of security when processing personal data.



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## Responsibilities and organisation

**Board of Directors of Kesko Corporation:** Approves this data protection policy.

**Audit Committee of the Board of Directors:** Monitors and evaluates the implementation of data protection as part of Kesko's compliance system.

**President and CEO of Kesko Corporation:** Has overall responsibility for the implementation and management of data protection. Has the right to make technical changes to the policy, such as updates required by legislation.

**K Legal and Sustainability:** The Executive Vice President, Legal and Sustainability is in charge of managing compliance with data protection legislation, this data protection policy, and the guidelines issued based on it. Data protection is managed as part of the Compliance function, and the Group Vice President, Governance, Compliance & Ethics reports regularly on data protection to the Group Management Board and the Audit Committee of the Board of Directors.

**Data Protection Officer:** Kesko may have one or more data protection officers, each responsible for developing, training, and supervising data protection practices in their respective areas. The data protection officer conducts inspections on data protection matters as part of their regular duties. The data protection officer delivers the annual data protection report directly to the Group Management Board and, if necessary, reports observations on data protection directly to the President and CEO, in addition to the regular data protection reviews by the Vice President, Governance, Compliance & Ethics.

**Business Management:** The controller is the Kesko Group company for whose purposes personal data is processed at any given time. Responsibility for implementing data protection lies with business and group management in their respective units. Management is responsible for ensuring that data protection maintenance is clearly organized and that each responsible person knows their role. Kesko's divisions, units, and companies are responsible for implementing the policy and providing the necessary resources in their operations. Each business unit and controller assesses and monitors the implementation of data protection in their own operations.

**Personnel:** Kesko personnel must comply with the policy and report any data protection incidents. If an employee does not comply with legislation, regulatory requirements, or Kesko's internal guidelines, or fails to complete mandatory training assigned to them, Kesko as an employer may intervene in the situation within the limits permitted by labor law.