

#### DATA PROTECTION NOTICE

This Data Protection Notice describes personal data processing related to Kesko Corporation's Annual General Meeting 2020. Dated 12 February 2020 and updated 7 April 2020.

#### 1. Controller

Kesko Corporation ("Kesko"), Helsinki Business ID 0109862-8 PO Box 1, FI-00016 KESKO

With regard to this register, you can contact the controller: Kesko Corporation, Taina Hohtari, PO Box 1, FI-00016 Kesko, Helsinki keskoyhtiokokous@kesko.fi

# 2. For what purposes will your personal data be processed?

The purpose of the register is to enable Kesko's shareholders, their representatives and their assistants to register and participate in Kesko's Annual General Meeting and to enable advance voting. Personal data is processed to ensure the shareholder's ownership and the participant's right to participate in the Meeting. The personal data will be used to compile a list of those registered to the Meeting, as well as a list of shareholders, their assistants and their representatives attending the Meeting, a summary list of advance votes, and, if voted at the Meeting, a report on the voting results.

The processing of personal data is based on the legal obligation of the controller.

Kesko offers shareholders a possibility to follow the Annual General Meeting via video link and to submit questions in advance. In this situation, the processing of personal data is based on the legitimate interest of the controller. The controller has the right to verify that the person subscribing the video link and submitting questions is a Kesko shareholder.



## 3. What data do we process?

For a shareholder, the following information may be collected in the register:

- Name
- Personal ID code or Business ID
- Address, phone number, email address
- Book-entry account number
- Number of shares and votes
- Voting information
- Language

For a representative, the following information may be collected in the register: name, personal ID code, phone number and email address. For an assistant, name may be collected in the register.

#### 4. Personal data source

The personal data is mainly collected from the shareholders who register for the Meeting themselves. When registering for the Meeting, the person either enters the data into the registration system maintained by Euroclear Finland Ltd or, if the person registers using another form of registration, the controller enters the provided data in the system. When voting in advance, shareholders themselves enter the data in the voting system maintained by Euroclear Finland Ltd. When ordering a video link or submitting questions in advance, shareholders themselves enter the relevant data. Shareholders' ownership information is retrieved from Kesko's register of shareholders maintained by Euroclear Finland Ltd. When authorising a representative, the shareholder provides the personal data of the authorised person, and the same applies for the information of an assistant.

# 5. Storage period

Personal data will only be retained for as long as is necessary for the purposes specified in this Data Protection Notice or for statutory retention periods. For example, the provisions of the Limited Liability Companies Act (624/2006) concerning the time period of bringing an action require the controller to retain personal data relating to a general meeting for three months from the decision of the general meeting. Personal data may be stored for a longer period for other regulatory purposes.

Kesko maintains the minutes of the Meeting, which shall include a list of participants at the Meeting (shareholders: name, number of voting ticket, share series, number of shares and voting rights, and name of proxy representative) throughout the period of operation of Kesko.



#### 6. Information on recipients of personal data

Kesko as the controller will process personal data itself, but will also use various service providers, such as providers of information technology services. Kesko strives to use the best, reliable partners and is responsible for the actions of the service providers it has selected with regard to the processing of personal data. The registration system for the Meeting is maintained by Euroclear Finland Ltd, and the video link and question submission service is provided by Innovatics Oy. The companies act personal data processors.

The list of participants at the Meeting is available as part of Kesko's Meeting material in accordance with the Limited Liability Companies Act. Kesko does not disclose the information for commercial purposes.

During the Meeting at the meeting venue and three days before that on the premises of Euroclear Finland Ltd, a temporary register of shareholders for the record date will be available. The list includes the following personal data of the shareholders: name and address or domicile, date of birth, nationality, and ownership information. If a shareholder has a safety ban and he/she has notified his/her book-entry account operator or Kesko of the ban, the domicile, address and other contact information of the shareholder registered in Kesko's register of shareholders (including the said temporary register) may only be disclosed to the authorities. The contact address listed for such a shareholder in the register of shareholders may be disclosed also to other recipients than authorities.

Personal data may be transferred or disclosed if the transfer of disclosure is necessary to protect the rights of the controller, to protect the data subject or others, to investigate fraud or to respond to requests from authorities.

## 7. What rights do you have and how do you exercise your rights?

#### Right to access

When you request access to your data, Kesko will inform you on whether it is processing personal data on you or not, and will provide you with a copy of the personal data being processed.

#### Right to rectification

You have the right to have incomplete personal data on you completed and inaccurate data corrected.

## Right to erasure

You have the right to request for your personal data to be erased from the register. Should there no longer be legal grounds for processing your personal data, your data will be erased.



# Right to restriction of processing

You may have the right to restrict the processing of your personal data. Once the processing has been restricted, the controller will not process your data in any other way except storing the data. This right exists, for example, if you contest the accuracy of your personal data, if the processing is unlawful, or if you have objected to the processing of your personal data and are waiting for a response to your request.

# Right to object

We may process your personal data on the basis of a legitimate interest in order to provide you with a video link service and the possibility to submit questions in advance, if we have determined that the processing does not infringe your personal data protection. In such cases, you have the right to object the processing of your personal data for personal reasons. If you object the processing of your personal data for these purposes, we cannot offer you the possibility to follow the Meeting via video link or to submit questions in advance.

Please send requests for exercising your rights to Kesko's contact person. Your request must be personally signed. Send the request to the address stated above and mark the letter with "data protection". If the response contains your personal data, we will deliver the letter by personal registered post. Only the person marked as the recipient can acknowledge receipt of the letter. This allows us to ensure the correct recipient of the letter and the confidentiality of the data.

If your request concerns information in a book-entry system maintained by Euroclear Finland Ltd, we ask you to contact Euroclear Finland.

## 8. Transfer of personal data to third countries

If Kesko uses service providers that process personal data outside the EU/EEA, for example in India, Kesko has made an agreement based on EU standard contractual clauses with the service providers regarding the transfer. The standard contractual clauses can be viewed at <a href="http://eur-lex.europa.eu/legal-content/FI/TXT/PDF/?uri=CELEX:32010D0087&from=en">http://eur-lex.europa.eu/legal-content/FI/TXT/PDF/?uri=CELEX:32010D0087&from=en</a>.

#### 9. Lodging a complaint

If you consider that we do not process your personal data in accordance with the EU General Data Protection Regulation, you can lodge a complaint with the supervisory authority. In Finland, this authority is the Data Protection Ombudsman.



# 10. Data protection officer

If your request concerns the processing of personal data or the exercise of your rights under the EU General Data Protection Regulation in the operations of Kesko or its subsidiaries, you can contact Kesko's data protection officer at: tietosuojavastaava@kesko.fi.

