



DATA PROTECTION STATEMENT – THE REGISTRATION AND ATTENDANCE OF THE SHAREHOLDERS OF VERKKOKAUPPA.COM OYJ TO ANNUAL GENERAL MEETINGS

1. Data Controller	Verkkokauppa.com Oyj (business ID: 1456344-5) Tyynenmerenkatu 11, 6th floor, 00220, Helsinki
2. Contact person	Robert Tallberg Verkkokauppa.com Oyj 010 3095555 robert.tallberg@verkkokauppa.com
3. The purpose of the processing of Personal Data	<p>Personal Data is collected for the purposes of the registration for and attendance of and for the arranging and documentation of the Annual General Meeting (“AGM”) of Verkkokauppa.com Oyj. Personal Data is processed in order to verify a person’s identity, shareholdings and his/her right to attend the Annual General Meeting. Personal Data is also processed for other purposes related to the arranging of the AGM, such as for drawing up the list of participants and voting lists, as well as for arranging advance voting and possible counterproposals and preliminary questions. Providing Personal Data in the manner described in this Data Protection Statement is a prerequisite for attending the Annual General Meeting.</p> <p>The personal data is used only for the Annual General Meeting and processing of any necessary registrations relating thereto.</p>
4. Legal basis	Processing of personal data in accordance with this Data Protection Statement is necessary in order to fulfil Verkkokauppa.com Oyj’s statutory obligations.
5. Personal Data which is processed	<p>The following identification data on shareholders, and their possible proxy representatives and assistants, can be compiled in the register:</p> <ul style="list-style-type: none">• name,• identity number, business ID,• address,• telephone number,• e-mail address,• book-entry securities account,• share and vote numbers,• advance votes, and• other possible additional information provided in connection with the registration. <p>When signing by e-mail, the individual is requested to provide information about themselves. Based on the personal identification code or business ID, the submitted data is compared with the share register maintained by Euroclear Finland Oy and share ownership data is retrieved from the share register. When providing authorization for a third party, shareholders are also required to provide personal information for the authorized individual.</p>
6. Retention of Personal Data	<p>The Personal Data contained in the minutes of the AGM and its appendices are stored as long as the company operates in order for Verkkokauppa.com Oyj to fulfil its statutory obligations. For other Personal Data, the active use of the Personal Data ends after the Annual General Meeting. Verkkokauppa.com Oyj removes the Personal Data from its information system after the appeals period, i.e., three (3) months after the Annual General Meeting.</p> <p>Additionally, as the case may require, the Data Controller may have to extend personal data retention on the grounds of establishment, exercise, or defence of legal claims.</p>
7. Regular sources of information	The regular source of information is the Data Controller’s share register hosted by Euroclear Finland Oy. The content of the share register is based on records made by account operators.



	<p>A shareholder by him-/herself (or his/her representative or custodian) provides Personal Data in connection with the registration.</p>
8. Recipients of Personal Data	<p>As a rule, Personal Data is not transferred to third parties. However, those processing Personal Data as well as the approved third parties (such as server service providers and Euroclear Finland Oy) form an exception to the rule, but they are obliged to process the Personal Data in accordance with the applicable laws. In addition to that, Personal Data is always secured and protected adequately in accordance with the applicable data protection legislation, if it is transferred abroad.</p> <p>Further, the stipulations of applicable laws, ongoing legal procedures or other legal requests may require to give access to the Personal Data for the authorities or to third parties.</p>
9. Data transfers outside the EU or EEA	<p>If the Data Controller transfers Personal Data outside the European Union or the European Economic Area, the Data Controller shall in all cases ensure that the Personal Data is transferred in accordance with the applicable data protection legislation and in accordance with adequate safeguards.</p> <p>The personal data in Euroclear Finland Oy's systems are physically stored in Finland. Euroclear Finland Oy may use external service providers for system maintenance, whose partners may operate outside the European Union or the European Economic Area. In such cases, the secure and appropriate processing of personal data is ensured by the standard contractual clauses of the European Commission in accordance with the General Data Protection Regulation, or by other appropriate safeguards in accordance with the applicable data protection legislation.</p>
10. The principles on how the Personal Data is secured	<p>Only our separately designated employees or external companies that are working on behalf of us or that are authorized by us have access to the Personal Data or the right to process it.</p> <p>Euroclear Finland Oy is responsible for the technical maintenance of the electronic register. The connection from a user's browser to the server of Euroclear Finland Oy is encrypted with SSL technology. Only certain designated persons have access to the system.</p>
11. Rights	<p>Rights</p> <p>Requests regarding the Personal Data are requested to be addressed to the contact person of the Data Controller in writing, using the contact details in section 2.</p> <p>The data subject has the right to know if his/her Personal Data is processed, and if they are, he/she has the right to access the Personal Data of him-/herself in the register.</p> <p>The data subject also has the right to request the rectification or erasure of this information or the restriction of the processing in accordance with the applicable data protection legislation.</p> <p>Safety Ban</p> <p>In a safety ban, the shareholders' address is not available on the share register. In the case of a safety ban, the shareholder shall submit a magistrate's resolution of the safety ban to Euroclear Finland Oy.</p> <p>Complaints to the supervising authority</p> <p>In case we would process the Personal Data in a way that the data subject considers to offend their legal rights, the data subject may lodge a complaint with the supervisory authority. The supervisory authority in Finland is the Data Protection Ombudsman (in Finnish: <i>tietosuojavaltuutettu</i>).</p>