



## DATA PROTECTION NOTICE

This Data Protection Notice concerns personal data processing related to Kesko Corporation's Annual General Meeting 2023. It is dated 1 February 2023.

### 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, Legal Affairs, PO BOX 1, FI-00016 KESKO, Helsinki  
[keskoagm@kesko.fi](mailto:keskoagm@kesko.fi)

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

The purpose of the register is to enable Kesko's shareholders and their proxy representatives to register for the Annual General Meeting and to enable the shareholders to exercise their rights. Personal data are processed to ensure the shareholder's ownership and the participant's right to participate in the General Meeting. The data are used to form the necessary lists, such as the list of General Meeting Participants, list of votes, and report on the voting results.

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

### 3. What data do we process?

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

- Name
- Personal ID, date of birth, Euroclear artificial ID, or business code
- Address, phone number, email address
- Number of shares and votes
- Voting information
- Language



The book-entry account number is used to identify the shareholder in Euroclear Finland Ltd's system; the number is not disclosed to Kesko.

For a representative or proxy representative, the following information may be collected in the register: name, personal ID, date of birth, phone number and email address.

#### **4. Personal data source**

The data are primarily obtained from the shareholder registering for the meeting and submitting written questions in advance, or from a person acting on the shareholder's behalf. Shareholders' ownership information is retrieved from Kesko's register of shareholders maintained by Euroclear Finland Ltd. An authorised party shall provide the information presented in the power of attorney.

#### **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 close of the general meeting. Personal data may be stored for a longer period for other regulatory purposes.

Kesko maintains the minutes of the General Meeting, which shall include a list of participants and votes at the General Meeting (shareholders: name, number of voting ticket, share series, number of shares and voting rights, and name of proxy representative) and voting reports 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 for the Annual General Meeting is maintained by Euroclear Finland Ltd which acts personal data processor.

The list of participants at the General 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.

On the day of the General Meeting and three days prior, a temporary register of shareholders for the record date will be available on the premises of Euroclear Finland Ltd. The list includes the

following personal data of the shareholders: name and address or domicile, date of birth, 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 or 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 of 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 be no 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, as a rule, 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.

Please send requests for exercising your rights to Kesko. 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 the book-entry system maintained by Euroclear Finland Ltd, please contact Euroclear Finland.

## 8. Transfer of personal data to third countries

We use the services of subcontractors in the processing of personal data. The data we process as a data controller may be transferred outside the European Union (EU) or the European Economic Area (EEA), for example, in connection with the provision of IT services. Such transfers may be carried out if one of the following conditions is fulfilled:

- The European Commission has decided that the country in question has an adequate level of data protection.
- Other appropriate safeguards have been put in place, for example by complying with standard contractual clauses approved by the European Commission or by ensuring that the company processing the data has binding corporate rules in place.

Standard contractual clauses approved by the European Commission can be found on the website of [the Publications Office of the EU](#). For further information on processing, please contact the contact address listed in Section 1.

## 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

You can contact Kesko's data protection officer at: [tietosuojavastaava@kesko.fi](mailto:tietosuojavastaava@kesko.fi).

