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Privacy policy – Verkkokauppa.com Oyj Investor Relations

With this privacy policy we inform you about the processing of personal data related to Verkkokauppa.com Oyj's investor relations. You can find more information about Verkkokauppa.com's personal data processing in our [general privacy policy](#) (available in Finnish).

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Data controller and contact information

The data controller is:

Verkkokauppa.com Oyj (Business ID: 1456344-5)
Tyynenmerenkatu 11
00220 Helsinki

For questions about data protection and personal data processing, you can contact us via email at tietosuoja@verkkokauppa.com and investors@verkkokauppa.com.

What data can be processed about me?

Investor and analyst event participants

Participant information typically includes details of the company's shareholders and investors, representatives of investment companies and banks, stock analysts, and financial journalists.

In addition to the information provided by the data subject, we may also receive participant information from banks and investment companies.



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Purpose of data processing

The processing purpose is to maintain contact with shareholders, manage investor relations, and facilitate communication between the company and various stakeholders, as well as organize meetings and events.

Processed data categories and legal basis for processing

Name, title, company/workplace, city, email

The legal basis for processing participant data for investor and analyst events is consent given by the individual.

Data retention

Participant data is retained for five years from the event for managing investor relations.

Shareholders

We may collect personal data directly from you, your representative, or the organization you represent, and/or from other data sources, such as the shareholder register maintained by Euroclear Finland Oy and the database concerning shareholders.

Purpose of data processing

Verkkokauppa.com's shareholder register is maintained by Euroclear Finland Oy, which acts as the data controller. The company uses shareholder data, i.a., for investor communication and investor relations, as well as in connection with annual general meetings.

The shareholder register data is also needed for dividend payments and publishing the list of significant shareholders on the company's various communication channels (e.g., investor pages and financial reports).

Processed data categories and legal basis for processing

Basic information about the shareholder, such as name, personal identification number, date of birth or other similar identification number, contact information, language, and nationality.

Information related to shareholdings, such as the number of shares and votes and related rights.

Information about significant shareholdings, i.e., so-called flagging notifications.

The legal basis for processing shareholder data is a legal obligation (Limited Liability Companies Act 624/2006, Section 3.17).



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Information about participation in annual general meetings and other similar events aimed at shareholders and investors.

Information about marketing consents and denials.

A separate privacy policy for processing shareholders' personal data related to the general meeting is available on the investor website's Annual General Meeting page.

Data retention

Basic information about shareholders and shareholdings is retained permanently by Euroclear.

Announcements and newsletter subscribers

You can subscribe to investor announcements and newsletters if you wish.

Purpose of data processing

The data is used for sending Verkkokauppa.com Oyj's stock exchange and press releases, investor news, and newsletters.

We send announcements to their subscribers, as well as representatives of our external stakeholders, journalists, and other individuals who we can reasonably assume to be interested in the company based on their job duties.

Processed data categories and legal basis for processing

Name, email address, language preference for publications, and a list of subscribed publications.

The legal basis for announcements and newsletters is the consent given by the data subject.

Data retention

We retain the data required for the above-mentioned processing purposes until the data subject informs us that they no longer wish to receive announcements or requests the deletion of their data. We also remove the data if we detect that the email address is no longer active.

How is my data stored and protected?

We have implemented commonly used and well-known security methods to protect all processed personal data from unauthorized access and accidental or unlawful destruction, alteration, disclosure, transfer, or other unlawful processing.

Verkkokauppa.com stores personal data within the EU. The technical and process security of the data centers and systems used to provide the service are at a very high level. We use an



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information security management system based on ISO 27001. Servers are protected by good security practices and the latest technologies to prevent data breaches and denial-of-service attacks.

In the processing of personal data and technical solutions, we follow good data protection practices, including data consolidation, minimization, pseudonymization, anonymization, and encryption, where possible.

All access to personal data is monitored according to good practices. Only Verkkokauppa.com's own employees have access to the data, and our staff is trained to use it safely and ethically. Access is restricted by access control, and each of our staff members sees data only to the extent necessary for the performance of their duties. All our employees are also bound by confidentiality obligations.

We use trusted partners to provide some services and functions, which may involve transferring data to a third party. All agreements with partners take into account the requirements set by the EU General Data Protection Regulation and other legislation.

What rights do I have?

As a data subject, you have the right to:

- Access your personal data, including the right to obtain a copy of the personal data we process about you.
- Request the correction or completion of your personal data. We will correct any incorrect personal data about you or complete any incomplete personal data.
- Request the deletion of your personal data. We will delete your personal data when there is no longer an applicable basis or justified reason for processing the data, or if the personal data has been processed unlawfully. Please note that we cannot delete all your personal data, for example, if you have outstanding debts with us or if there are other compelling, legally defined, or accepted reasons for processing the personal data, such as legally defined minimum retention periods or the need to use the data to prepare or present a legal claim or defend against such a claim.
- Object to the processing of your personal data when the processing is based on legitimate interest, and you have a personal, specific reason related to your situation to object to the processing. We will comply with your request unless we have a significantly important and justified reason that overrides your interests and freedoms, or if continuing to process the personal data is necessary to prepare, present, or defend a legal claim. Additionally, you



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always have the right to object to the processing of your personal data for direct marketing purposes.

- Request the restriction of the processing of your personal data, for example, if you have disputed the accuracy of your personal data, your personal data has been processed unlawfully but you oppose the deletion of the data, or if any other conditions under Article 18 of the GDPR are met. In such cases, we will restrict the processing of your personal data to merely storing the personal data. Despite the restriction, we may still process your personal data to prepare, present, or defend a legal claim.
- Receive your personal data in a structured, commonly used, and machine-readable format and transfer the data from one system to another, to the extent that the processing of the personal data is based on your consent or an agreement between us.
- Additionally, if the processing is based on separate consent, you have the right to withdraw your consent at any time. Please note that this does not affect the lawfulness of the processing carried out before the withdrawal of consent.

You can request a copy of the data related to investor relations stored in Verkkokauppa.com's systems by contacting us via email at: investors@verkkokauppa.com.

You can make a request to exercise your other rights by contacting our customer service or tietosuoja@verkkokauppa.com. The request must be sufficiently specified so that we can verify your identity. We will inform you if we are unable to fulfill your request in some respects, for example, if we cannot delete all data that we are legally obliged to retain (such as credit information) or have the right to retain.

If you notice any deficiencies or unlawful processing, you have the right to file a complaint with the data protection authority.

Can this privacy policy be changed?

We continuously develop our services. Legislation and its interpretation also evolve. These or other reasons may require us to update this privacy policy from time to time. Significant changes to the privacy policy will be notified to the data subjects when updates are made.

Who can I contact?

You can contact investor relations, shares, or related personal data processing via email: investors@verkkokauppa.com.



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For general questions related to personal data processing, contact tietosuoja@verkkokauppa.com, and for other matters, our customer service at asiakaspalvelu@verkkokauppa.com.