

## Data Protection Principles

Updated 26 March 2020

Updates to these principles are announced on our website.

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| <b>1. Data controller</b>   | Elisa Corporation (Business ID: 0116510-6)<br><br>Contact details for Elisa:<br>Elisa Corporation<br>PL 1 (Visiting address: Ratavirtijankatu 5, Helsinki)<br>00061 ELISA<br><br>Contact details for Elisa's data protection officer:<br>Data Protection Officer / Elisa Corporation<br>PL 1<br>00061 ELISA<br><br>Email: <a href="mailto:tietosuojaavastaava@elisa.fi">tietosuojaavastaava@elisa.fi</a>   |
| <b>2. Names of registers</b>                                      | Elisa Corporation shareholder register, records of Elisa Corporation general meetings, and shareholder registers of companies merged with Elisa Corporation  |
| <b>3. Purpose and legal basis for processing of personal data</b> | <p>Maintaining the shareholder register as required by the Limited Liability Companies Act (624/2006). Keeping records of general meetings (list of shareholders on the date of record of the general meeting, list of those who registered for the general meeting, and list of shareholders, their assistants and proxy representatives who participated in the general meeting) is also required by the Limited Liability Companies Act.</p> <p>Shares in Elisa are in the form of book-entry securities in the book-entry system maintained by Euroclear Finland Oy. The maintenance of the book-entry register is regulated by the Act on the Book-Entry System and Settlement Activities (348/2017). Euroclear Finland's privacy statement can be found at <a href="http://www.euroclear.com/finland/en.html">www.euroclear.com/finland/en.html</a>.</p> <p>Personal data may also be processed for other legitimate interests for which processing of personal data is required, such as when clarifying the ownership status of a shareholder when exchanging shares (stocks) of a merged company for Elisa shares, or when clarifying the contact details required to contact a shareholder in order for them to exercise their rights and obligations, or in order to provide information about matters related to general meetings. Processing of personal data may also be required in order for Elisa to meet other legal requirements.</p> |
| <b>4. Categories of personal data to be processed</b>             | Registers of shareholders registered in the book-entry system include the following information: <ul style="list-style-type: none"><li>- Name of shareholder or nominee-registered shareholder</li><li>- Personal identity code or another unique identifier</li><li>- Contact details, details of payments and taxation</li><li>- Number of shares by share class</li></ul>   |



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|   | <ul style="list-style-type: none"> <li>- Name of the central security depository in whose book-entry account the shares are registered</li> </ul> <p>Other information required by the system is also recorded in the book-entry system.</p> <p>Information recorded in registers of shareholders not in the book-entry system:</p> <ul style="list-style-type: none"> <li>- Name and address of the shareholder</li> <li>- Number of individual shares or share certificates by share class</li> <li>- Share issue dates</li> <li>- Other differences in the rights and obligations arising from the shares</li> </ul> <p>If no share certificate has been issued for a share or shares, the lien on the share notified to the company or another equivalent right will be recorded in the shareholder register.</p> <p>In addition, the company processes e.g. other historical data as well as information about dividends paid.</p> <p>For general meetings, the list of shareholders on the date of record of the general meeting as well as a list of those registered for the meeting and a list of shareholders, their advisors and proxy representatives who participated in the meeting are recorded for shares registered in the book-entry system.</p> <p>The data recorded in connection with registration for general meetings and in the lists mentioned above includes the following:</p> <ul style="list-style-type: none"> <li>- Name of shareholder and their personal identity code, address, telephone number and email address, their book-entry account number, the number of shares and votes, voting information, and details of advisors and authorised proxy representatives.</li> </ul> <p>The book-entry account number is used only for identification for transactions in systems operated by Euroclear Finland Oy, and it is not given over to the company. The company has the possibility to obtain the voting information of an individual shareholder in order to verify the correctness of the voting result.</p> |
| <p><b>5. Sources of personal data</b></p> | <p>Personal data for Elisa's shareholder register and other registers based on the book-entry system come from the book-entry system.</p> <p>People who register to attend a general meeting provide personal data themselves, and those data are combined with data from the book-entry system. When needed, contact details may also be obtained from public sources or from Elisa's customer data system. When issuing a proxy authorisation, the person issuing the authorisation provides the necessary personal data relating to the person being authorised, as well as personal data relating to any assistants.</p> <p>For any Elisa subsidiary that is not registered in the book-entry system, personal data are collected in accordance with the Limited Liability Companies Act and are based on data provided by the person concerned or by the authorities.</p>   |



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| <p><b>6. Recipients of personal data</b></p>                  | <p>The following information about shareholders can be seen in Elisa's shareholder register, which is available from the public access terminal at Euroclear Finland's customer service point:</p> <ul style="list-style-type: none"> <li>- Name and address or home municipality of the shareholder</li> <li>- Date of birth</li> <li>- Nationality</li> <li>- Details of ownership</li> <li>- Number of waiting lists and reason for inclusion on a waiting list</li> <li>- Information on any joint owners</li> </ul> <p>Euroclear Finland may disclose data from the shareholder registers for direct marketing purposes or for marketing surveys and opinion polls, unless such disclosure has been forbidden by the data subject.</p> <p>In accordance with the rules of Euroclear Finland, the temporary list of shareholders prepared for a general meeting is made public based on the same principles as the official shareholder register on the day of the general meeting and for the preceding three (3) business days. The list of people participating in the general meeting may be disclosed as part of Elisa Corporation's general meeting material.</p> <p>Elisa is entitled to obtain from Euroclear Finland the following more extensive information about Elisa's owners:</p> <ul style="list-style-type: none"> <li>- Owner's name, address, unique identifier, language, nationality, sector and potential customer restrictions</li> <li>- Details of ownership</li> <li>- Number of waiting lists and reason for inclusion on a waiting list</li> <li>- Information about any co-owners</li> <li>- Information about the account manager</li> </ul> <p>If disclosure of personal data about a shareholder has been restricted by a local register office (non-disclosure for personal safety reasons) and Elisa has been notified of this restriction, the home municipality, address and other contact details recorded in the shareholder register about the shareholder in question may only be disclosed to the authorities. The contact address for the shareholder in question recorded in the shareholder register may be disclosed to parties other than the authorities.</p> <p>For taxation purposes, Euroclear Finland will disclose to the Tax Administration the required information about book-entry securities registered in the book-entry system, their owners and beneficiaries of revenue.</p> <p>Shareholder registers of companies merged with Elisa are not public information, and information about them is not generally disclosed.</p> <p>Personal data covered by this privacy statement may be disclosed to the authorities.</p> |
| <p><b>7. Transfer of personal data to third countries</b></p> | <p>Processing of personal data registered in the book-entry system takes place in countries reported by Euroclear Finland, including outside the EEA in India.</p>   |



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|   | <p>Euroclear Finland is responsible for concluding the necessary agreements for processing this personal data.</p> <p>Personal data are also processed in Elisa's own systems and Elisa's subcontractors process personal data. Such personal data may be processed outside Finland, the EU or the EEA, such as in South Africa, India, Israel or the United States of America. In such cases, we ensure that the body processing the personal data does so in accordance with our data protection principles, carefully and properly, and we ensure the legitimacy of such processing e.g. by using standard contractual clauses approved by the European Commission.</p>   |
| <p><b>8. Criteria for determining retention periods for personal data</b></p> | <p>Personal data pertaining to the book-entry register maintained by Euroclear Finland is retained indefinitely.</p> <p>Personal data pertaining to Elisa's general meetings is retained for at least as long as the company exists.</p> <p>Personal data pertaining to shareholders of companies merged with Elisa is retained for a minimum of ten (10) years following the merger.</p>  |
| <p><b>9. Rights of data subjects</b></p>                                      | <p>Under the General Data Protection Regulation, data subjects have the following rights regarding their own personal data:</p> <ul style="list-style-type: none"> <li>- Right to access their own personal data</li> <li>- Right to request that the data controller rectify missing or incorrect personal data</li> <li>- Right to object to or restrict the processing of their personal data and the right to object to automated decision-making</li> <li>- Right to request that the data controller erases personal data</li> <li>- Right to transmit data to another data controller</li> </ul> <p>Data subjects who wish to exercise these rights must contact the data protection officer stated above. If the data subject has himself/herself consented to the processing of their data and there is no other legal basis for such processing, the data subject has the right to withdraw their consent by contacting the above-mentioned data protection officer. Data subjects have the right to submit complaints to the supervisory authority.</p> |

