

PRIVACY STATEMENT – EXTRAORDINARY GENERAL MEETING OF WITHSECURE CORPORATION 2022

This Privacy Statement describes the personal data processing related to WithSecure Corporation's Extraordinary General Meeting.

Data controller and contact person

WithSecure Corporation
Tammasaarencatu 7
PO Box 24
FI-00180 Helsinki
Finland
privacy@f-secure.com

1. Purpose and legal basis for processing personal data

Personal data is collected from persons who register for the Extraordinary General Meeting of WithSecure Corporation and/or the virtual event that is organised for WithSecure Corporation's shareholders before the Extraordinary General Meeting. The purpose for the collection of personal data is to enable shareholders of WithSecure Corporation to register for and participate in the Extraordinary General Meeting and the virtual event that is organised before the Extraordinary General Meeting, and to ascertain each registrant's identity and his or her right to participate in the Extraordinary General Meeting and the virtual event organised for WithSecure Corporation's shareholders after the Extraordinary General Meeting. Furthermore, the information is used to print a list of participants and a list of votes as well as to organise the advance voting. A list of votes will be appended to the minutes of the Extraordinary General Meeting. As described in this statement, the list is compiled of persons who register for the meeting and vote in advance, either in person or by way of a proxy representative. Innovatics Ltd is responsible for the technical implementation and maintenance of the Extraordinary General Meeting registration system and advance voting. The shareholder register is maintained by Euroclear Finland Oy.

Pursuant to the General Data Protection Regulation (EU 2016/679), the primary legal basis for the processing of personal data is the data controller's legal obligation to hold a shareholders' meeting in accordance with the Limited Liability Companies Act (624/2006), which also includes the obligation to draw up the minutes of the Extraordinary General Meeting as well as the list of votes.

Furthermore, in accordance with the General Data Protection Regulation, the processing of personal data is also necessary for the purposes of the legitimate interests of the data controller to enable, among other things, the organisation of the virtual event for the shareholders.

Personal data will not be used for automated decision-making that would have legal or equivalent effects on the data subjects.

2. Collected personal data

The following personal information may be collected from the data subjects: the shareholder's and his or her representative's (if any) name, personal ID/date of birth or business ID, address, contact information, e-mail address, number of shares and votes, voting information, manner of identification, basis of representation, date of registration, any information on an assistant and proxy document, advance questions and any additional information given during registration. The time participants arrive to the meeting and depart it will also be recorded.

In case a shareholder registers for the Extraordinary General Meeting and votes in advance online, Innovatics Ltd will act as the technical service provider of data collection. The following information can be collected through this service: name, personal ID/date of birth or business ID, address, telephone number, e-mail address. When registering in any other manner than online, the data controller or Innovatics Ltd enters the participant's personal data into the system maintained by Innovatics Ltd as specified in section 3.

Log data of registration and voting and the user's IP address will also be recorded for the purposes of the technical maintenance and monitoring of Innovatics Ltd's service. With respect to this information, Innovatics Ltd acts as an independent data controller.

In order to verify the correctness of voting results, the company has access to an individual shareholder's

voting information.

3. Regular sources of information

When registering online, a shareholder enters information about himself or herself into the registration system. When registering in any other manner, the shareholder declares his or her name, personal ID/date of birth or business ID and address, as well as other information required for participation, such as his or her email-address, to the data controller or Innovatics Ltd. The registration system compares the information to WithSecure Corporation's shareholder register maintained by Euroclear Finland Oy and retrieves the participant's shareholding information from the shareholder register. When issuing a power of attorney / authorising a proxy representative, the person also enters the necessary personal data of the proxy representative into the registration system.

4. Regular disclosures of personal data

Personal data will be disclosed to Innovatics Ltd, acting as the technical service provider and administrator of the Extraordinary General Meeting registration system and advance voting and processing personal data on behalf of the data controller.

The following information on the shareholders' registration and shareholding is available at Innovatics Ltd's premises at Tammasaarenkatu 7, Helsinki:

- name and address or home municipality of the owner
- date of birth
- details on shareholding (number of shares by share type)
- information on any joint holders
- information on temporary registration to the Extraordinary General Meeting
- information on any customer restriction

5. Personal data transfers outside the EU or the European Economic Area

Data, such as a shareholder's and representative's name, telephone number and any additional information given during registration, can be transferred to a server located in Switzerland in order to send text messages to the shareholders who have registered for the Extraordinary General Meeting. Services relating to processing of the data are mainly provided within the European Economic Area. However, WithSecure Corporation's service providers may, in limited cases, offer certain support services in connection to which the data may be accessed from outside the European Economic Area. In these situations, the legality of data transfers and the protection of personal data is ensured through standard contractual clauses prepared by the European Commission or other transfer mechanisms allowed under the General Data Protection Regulation.

6. Principles of the protection of the register

A. Manual data register

Manual data is kept in a locked space and is available only for authorised persons.

B. Electronic data register

Innovatics Ltd is responsible for the technical maintenance of the register. The connection from a user's browser to the server of Innovatics Ltd is encrypted with SSL-technology. Technical data protection is used in the registration system, by means of which the entered information remains unchanged and is available only for authorised persons. Technical data protection includes, among other things, telecommunication encryption, monitoring of message integrity and user identification. Only certain persons have access to the data stored in the registration system. The data is protected by user ID and password.

7. Retention and deletion of personal data

Innovatics Ltd retains the personal data collected through the Extraordinary General Meeting registration system for a maximum of one year from the closing of the meeting. The registration and advance voting data is available for the shareholders online for three months (confirmation that the advance votes are taken into account in the calculation of votes). After this, the data will be taken down and a backup will be

made of the database. Access to this backup is limited and it will be retained for six months. The data will be completely erased after one year from the closing of the Extraordinary General Meeting at the latest.

Euroclear Finland Oy retains personal data stored in the Extraordinary General Meeting registration system for four months from the closing of the meeting.

A list of votes will be appended to the minutes of the Extraordinary General Meeting. The list includes the name of the shareholder, number of the ballot and details on shareholding (number of shares and votes as well share class). The minutes and its appendices will be stored throughout the operational life of the company in order to comply with the company's statutory obligations or a minimum of 10 years after the end of the financial year.

8. Data subjects' rights

Regardless of secrecy provisions, a shareholder is entitled to access, after having supplied sufficient search criteria, all data concerning himself or herself in the data file, or to receive a confirmation from the data controller that the data file does not contain any personal data concerning the shareholder.

The data controller shall, without undue delay, on its own initiative or at a shareholder's request, rectify, erase or supplement personal data contained in the personal data file, provided that such data is erroneous, unnecessary, incomplete or obsolete for the purposes of the processing of the data. The data controller shall also prevent the dissemination of such data if this could compromise the protection of privacy of the shareholder or his or her rights. If the data controller refuses a shareholder's request concerning rectification of an error, a written certificate to this effect shall be issued by the data controller. The certificate must also mention the reasons for the refusal.

A shareholder has the right to object, in relation to his or her particular personal situation, to the processing of the shareholder's personal data by the data controller, provided that the processing of the data is based on the legitimate interest of the data controller. If the data subject objects to the processing, the data controller may no longer process the personal data, unless the data controller can demonstrate that the processing is justified.

In certain situations, further specified in Article 18 of the General Data Protection Regulation, a shareholder has the right to request the data controller to restrict the processing of his or her personal data. A shareholder may request the restriction of the processing of his or her personal data, for example, when a shareholder has objected to the processing of his or her personal data and is awaiting verification as to whether the interests of the data controller override the interests of the shareholder. If processing is restricted, the data controller may store the data, but in principle may not process it otherwise.

Such requests described above, which must be sufficiently detailed, shall be sent to the contact person of the data controller either by e-mail to the address privacy@f-secure.com or by letter to the address WithSecure Corporation, Tammasaarenkatu 7, PO Box 24, FI-00180 Helsinki.

In the event the data subjects have concerns or remarks regarding the processing activities described in this privacy statement, they have the right to lodge a complaint with a data protection supervisory authority. In Finland, the competent supervisory authority is the Office of the Data Protection Ombudsman (tietosuojafi.fi).