

## PRIVACY STATEMENT – GENERAL MEETING OF WITHSECURE CORPORATION

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

Data controller and contact person

WithSecure Corporation  
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Finland  
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### 1. Purpose and legal basis for processing personal data

Personal data is collected from persons who register as attending the General Meeting of WithSecure Corporation either at the meeting venue or via remote connection or who vote in advance. The purpose for the collection of personal data is to enable shareholders of WithSecure Corporation to register for and participate in the General Meeting, and to ascertain each registrant's identity and their right to participate in the General Meeting. Furthermore, the information is used to print a list of participants and a list of votes. A list of votes will be appended to the minutes of the 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 General Meeting registration system, in-meeting statistics, voting and advance voting. Inderes Oyj is the General Meeting service provider and responsible for the technical implementation of remote participation. The shareholders' 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 General Meeting as well as the list of votes.

To the extent that the processing of personal data is not based on the data controller's legal obligation, it is based on the legitimate interest of the data controller to process personal data in order to organise and administer the General Meeting and the voting.

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 identification number (in the case of online registration when strong authentication is used), 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 General Meeting and votes in advance online, Innovatics Ltd will act as the technical service provider of data collection. 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 the processing of these personal data, Innovatics Ltd acts as an independent data controller. The privacy policy of Innovatics Ltd is available [here](#).

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

Personal information is primarily collected directly from a shareholder or their representative. Information may also be collected from public sources, such as the Virre data service in the context of the Euroclear register comparisons.

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, 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 shareholders' register maintained by Euroclear Finland Oy and retrieves the participant's shareholding information from the shareholders' 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. The proxy representative may also provide the information about the shareholder and himself/herself.

### 4. Regular disclosures of personal data

Personal data will be disclosed to third parties involved in the organisation of the General Meeting, including Innovatics Ltd and Inderes Oyj. In this connection, Innovatics Ltd and Inderes Oyj process personal data on behalf of the data controller. The data controller may also use other suppliers, such as IT service providers, for the organisation or administration of the General Meeting and the voting. The data controller shall ensure with sufficient contractual obligations that the service providers acting on behalf of the data controller process personal data in accordance with the data controller's instructions and privacy policy.

The following information on the shareholders' registration and shareholding is available at the data controller's premises at Välimerenkatu 1, 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 Annual General Meeting
- information on any customer restriction

In addition, the minutes of the General Meeting and their annexes will be kept available after the General Meeting in accordance with the Companies Act.

### 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 with foreign phone numbers who have registered for the Annual General Meeting. Text messages to Finnish phone numbers are sent using a Finnish service provider. 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 in accordance with the General Data Protection Act through standard contractual clauses prepared by the European Commission and supplemented with additional protection measures when necessary, or through 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. 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

The personal data collected through the General Meeting registration system and the remote participation system are retained 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 General Meeting at the latest.

Euroclear Finland Oy retains personal data stored in the 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 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 their appendices will be stored throughout the operational life of the company and for 10 years from the end of the financial year once the company's operations have been terminated in order to comply with the company's statutory obligations (chapter 2, section 10 of the Accounting Act (1336/1997)).

#### 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 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@withsecure.com](mailto:privacy@withsecure.com) or by letter to the address WithSecure Secure Corporation, Välimerenkatu 7, FI-00180 Helsinki, Finland.

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 ([tietosuoja.fi](http://tietosuoja.fi)).