

Privacy Policy

This Privacy Policy describes the personal data processing relating to Finnair's Extraordinary General Meeting on 27 October 2023.

Updated: 4 October 2023.

1. Data Controller

Name: Finnair Plc
Address: Tietotie 9, 01530 Vantaa
Business ID: 0108023-3

2. Contact Person in Matters Concerning the Register

privacy@finnair.com

3. Name of the Register

Finnair Oyj's Extraordinary General Meeting Register

4. Purpose of the Processing of Personal Data and Legal Basis

The purpose of processing the personal data is to enable organizing and execution of the Extraordinary General Meeting according to law.

Personal data is processed only for the purposes necessary for arranging the Extraordinary General Meeting. Personal data is processed for example for the purposes of confirming the identity of the registrant, checking the right to participate, preparing the Extraordinary General Meeting's participant list, vote list and possible vote tickets, organizing voting and to manage possible advance questions and requests to speak in the Extraordinary General Meeting.

Innovatics Oy is the technical service provider for the registration and advance voting system. The shareholders' register is maintained by Euroclear Finland Oy.

Processing of the personal data is based on Finnair Oyj's legal obligations.

5. Personal Data Processed

The personal data processed includes the shareholders' and the shareholder's proxy representative's name, personal identification number and/or business identification number, address, contact details, number of shares and votes, voting information, method of identification, basis of representation, date of registration, and information of the assistant, proxy, advance questions, and possible other information provided during the registration. Log data about the registration and voting, and the user's IP address are stored for the purposes of technical maintenance and monitoring the service.

The register contains Euroclear Finland Oy's list of shareholders at the record date, which contains e.g. the name of the shareholder, personal or business identification number, address and the number of shares.

The register contains Euroclear Finland Oy's temporary list of nominee registered shareholders who have registered to participate in the Extraordinary General Meeting and the number of their shares.

6. Sources of the Personal Data

The personal data is collected from the person or their representative when registering to the Extraordinary General Meeting. When registering via post or e-mail, Finnair Oyj or Innovatics Oy enters the registrant's personal data and possible advance votes to the register.

Based on the personal data provided in connection with the registration, Innovatics Oy retrieves the number shareholder's shares from the list of shareholders on the record date of the meeting created by Euroclear Finland Oy.

Innovatics Oy enters the information about the votes of holders of nominee registered shares.

7. Disclosures of the Personal Data

The register of votes and a voting list and a summary of votes cast will be created based on the information entered to the system, and the lists will be attached to the minutes of the Extraordinary General Meeting. The list of votes includes the shareholder's and/or their representative's name, voting ticket number, the number of shares and votes, basis of representation and the participation method.

In accordance with the Limited Liabilities Companies Act, a list of shareholders is kept available for viewing at the Extraordinary General Meeting. The list of shareholders contains the name, municipality, and the number of shares and votes as at the record date of the Extraordinary General Meeting. The list will also contain the information of holders of nominee registered shares who have temporarily registered into the shareholders' register for the Extraordinary General Meeting.

8. Personal Data Transfers to Third Parties and Outside the European Union or the European Economic Area

Information may be made available for such parties who will participate in arranging the Extraordinary General Meeting and who need the information for such purposes. The data is not handed over to commercial purposes.

Text messages to registrants with a foreign phone number are sent via a Swiss service. Otherwise, no information is transferred outside the European Union or the European Economic Area.

9. Protection of Personal Data

Non-digital data is stored in a locked space and is available only for authorized persons.

Digital data is stored in a data center that meets the requirements for processing personal data. Data connection between the user's browser and the server is encrypted. Access to the system is limited to those employees of the data controller and its subcontractors who need and process the information for arranging the Extraordinary General Meeting.

10. Retention Period and Erasure of Personal Data

Innovatics Oy stores the personal data for a period of maximum two years after the Extraordinary General Meeting. Euroclear Finland Oy stores the personal data for a maximum of four months after the Extraordinary General Meeting.

The list of participants of the Extraordinary General Meeting is stored permanently. It contains the participant's name, names of the possible assistant or proxy representatives, number of shares and details relating to voting.

All other data will be deleted, when they are no longer necessary for documenting the Extraordinary General Meeting's minutes or checking for their accuracy.



11. Rights of the Data Subject

The data subject has a right to know the data stored by the data controller about them to the register. The data subject has also the right to request for rectification, erasure, or completion of incomplete personal data. The request should be addressed to the contact person mentioned in chapter 2 of this Privacy Policy.

The data subject has the right to lodge a complaint to the Data Protection Ombudsman, should they have concerns or remarks regarding the processing of personal data. The instructions for lodging a complaint can be found from the Data Protection Ombudsman's website <https://tietosuoja.fi/>.