

This Data Protection Notice applies to the processing of personal data in Kesko's investor relations data file

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1. Data controller

Kesko Corporation, Helsinki
Business ID 0109862-8
PO Box 1, FI-00016 KESKO, Finland

You can contact the data controller about this data file using the following contact information: IR@kesko.fi

2. The data are we processing

We process the following personal data:

- Name and contact details
 - e.g. first name, last name, telephone number, email address
- Name of employer, job title, company address
- Data related to managing the investor relationship
 - data on meetings, such as time and place and notes
- Other data potentially provided by the data subject in relation to an investor event
 - data on the participant and name of potential “plus-one”
 - dietary choices
- Information related to contacts
 - e.g. email and chat
- Information on shareholders
- Information on release subscriptions
 - email address, first name, last name, company name, release categories chosen

3. The purposes for which we process personal data

The data of Kesko's investors, investor companies, contact persons for banks, and analysts that cover Kesko are processed in this data file. The data are processed for the purposes of handling investor relations, contacts, events, for sending Kesko releases, and for invitations to various events.

The processing is necessary for our legitimate interests. We deem that we have a legitimate interest based on an investor relationship to process the data of analysts, investors, and contact persons of investor companies or banks when the duties of the person include collaboration with us.

The processing of personal data related to participation and dietary choices for events is based on the data subject's consent.

We disclose data related to potential requests concerning the exercise of a data subject's rights to Kesko Corporations's data protection portal's data file, where the data are used to process the request in accordance with what is stated in the [Data Protection Notice](#) of the data protection portal. The processing is necessary for us to fulfil our legal obligation to respond to requests by data subjects, and to implement our legitimate interest to show that the request has been processed as required by the Data Protection Regulation.

4. Storage period

We store personal data in our services as follows:

- We store data on investors and contact persons of investor companies for as long as the person in question acts as an analyst, investor or contact person for the investor company. Data on the contact person are erased when we receive information of a change in contact person.
- Data concerning investor meetings, such as notes, are stored as is for five years following the meeting. After that, the data is changed so that the data cannot be linked to an individual person.
- We store data for the duration of an event and erase that data after the event.

5. Data subject rights

Right of access

When you request access to your data, we will inform you on whether we are processing personal data on you or not, and will provide you with a copy of the possible personal data being processed.

Right to rectification

You have the right to have incomplete personal data on you completed and inaccurate data corrected.

Right to erasure

You have the right to request for your personal data to be erased. Should there no longer be legal grounds for processing your personal data, your data will be erased.

Right to data portability

You have the right to receive the data you have provided to us, in a machine-readable format, and to transmit the data to another controller, if the processing is based on consent or on a contract and if the processing is carried out by automated means.

Right to object

We may process your personal data on the basis of a legitimate interest, that is, as part of our business operations if we have determined that the processing does not infringe your personal data protection. In such cases, you have the right to object to the processing of your personal data by referring to your personal reasons.

You may also object the processing of your personal data for direct marketing purposes at any time.

Right to restriction of processing

You may have the right to restrict the processing of your personal data. Once processing has been restricted, the controller will not, as a rule, process your data in any other way except storing the data. This right exists, for example, if you contest the accuracy of your personal data, if the processing is unlawful, or if you have objected to the processing of your personal data and are waiting for a response to your request.

6. How to exercise data subject rights

Kesko's data protection portal can be accessed at <https://tietosuoja.kesko.fi> In the portal, you can submit a request by strong identification using Finnish online banking codes. We will primarily use the portal to respond to requests received through the portal unless you specifically request a different delivery method.

If you cannot or do not wish to use the portal, you can send a request to us with a personally signed letter to the above address. Please mark the envelope with "Data Protection". We will respond to this type of request by letter. If the response contains your personal data, we will deliver the letter by personal registered post. Only the person marked as the recipient can acknowledge receipt of the letter. This allows us to ensure the correct recipient of the letter and the confidentiality of the data.

7. Information on the recipients of personal data

Kesko as the controller will process the personal data itself, but will also use various service providers. Kesko strives to use the best, reliable partners and is responsible for the actions of the service providers it has selected with regard to the processing of personal data. Such service providers may vary, but include:

- Information technology service providers and event producers
- Investor communication service providers
- Investor service providers

The data we process as data controller may be transferred outside the European Union (EU) or the European Economic Area (EEA) e.g. in connection with providing IT

services. Such transfers may take place provided that one of the following prerequisites are met:

- the European Commission has determined, that the level of data protection in the destination country is sufficient; or
- other appropriate safety measures, such as Standard Contractual Clauses published by the European Commission or Binding Corporate Rules, are applied to the transfer.

You can access the Standard Contractual Clauses published by the European Commission on the EU Publication Office's [website](#). For more information about the transfer, contact the data controller using the contact details provided in section 1 of this data protection notice.

Some authorities also have a legal right of access, for example, the police, customs, border guard and tax authorities.

8. Lodging a complaint

If you think that we are not processing your personal data in accordance with the EU General Data Protection Regulation, you can lodge a complaint with the supervisory authority. In Finland, this authority is the Data Protection Ombudsman.

9. Necessary personal data for the investor relations data file

We must process necessary personal data, including name and contact details, in order to be able to provide services for investors.

10. Information on automated decision-making, including profiling

The personal data is not used for automated decision-making, such as profiling.

11. Use of personal data for other purposes

We do not use data for purposes other than those stated in this notice. Should other purposes arise, we will inform you of those purposes and of the grounds for processing. If necessary, we will request consent from you to process personal data for such purposes.

12. Data obtained from other sources than the data subject

We obtain contact details for persons representing investor companies from public registers and Kesko's investor relations data file. Banks may also provide contact details for representatives.

13. Data Protection Officer

You can contact Kesko Group's data protection officer by [email](#). Please specify which data file your request concerns.