

PRIVACY NOTICE

Sampo plc is committed to protecting your privacy and personal data in accordance with current legislation. This Privacy Notice reviews the ways in which Sampo plc collects and processes the personal data of shareholders in relation to the Extraordinary General Meeting.

1. Who is the data controller?

The data controller responsible for the collection and processing of personal data in accordance with this Privacy Notice is Sampo plc, whose registered address is Fabianinkatu 27, 00100 Helsinki, and the contact person in this matter is Compliance & Insider Officer Johanna Hytönen, tel. 010 516 0729.

2. What is the purpose of and legal basis for processing the data?

Personal data is processed when a shareholder of Sampo plc registers for the Extraordinary General Meeting and when a shareholder presents a counterproposal or a question in advance.

In accordance with Chapter 5 Section 23 of the Finnish Companies Act, a list of votes will be appended to the minutes of the Extraordinary General Meeting. The list of votes is compiled based on this register and will not include other personal data than the names of the shareholders who have exercised their right to vote at the meeting, and of any agents, as well as the number of shares and votes. Sampo plc's shares are registered as book entries in the book-entry system, which is maintained by Euroclear Finland Oy. The book-entry system is regulated by the Finnish Act on the Book-Entry System and Settlement Activities. Euroclear Finland Oy's privacy notice is available at www.euroclear.com/finland/en/who-we-are/gdpr.html

Counterproposals made by shareholders and taken to be handled at the Extraordinary General Meeting shall be published on the company's website www.sampo.com/egm, along with the name of the relevant shareholder. If a counterproposal is not taken to be handled at the Extraordinary General Meeting, the personal data of the shareholder making the counterproposal shall not be disclosed outside of Sampo plc.

Any questions presented by shareholders pursuant to Chapter 5, Section 25 of the Finnish Companies Act on topics included in the meeting agenda shall be published on the company's website www.sampo.com/egm without the shareholder's personal data. The personal data of the shareholder presenting the question shall not be disclosed outside of Sampo plc.

3. What kind of personal data do we collect?

If the shareholder registers and votes in advance online, Euroclear Finland Oy will take care of the technical processing of the data. The data link from the user's browser to Euroclear Finland Oy's server is protected with SSL encryption. The following personal data may be collected through this service: name, personal identity code, date of birth, address, telephone number, email address, book-entry account number and voting information. The book-entry account number is utilised in identifying the shareholder in Euroclear Finland Oy's systems, and as such Sampo plc does not have access to it.

When voting using a medium other than the Internet, the data controller or Euroclear Finland Oy enters the shareholder's and proxy representative's personal data in the system maintained by Euroclear Finland Oy.

4. What is the source of the personal data?

When voting via the internet, shareholders must provide their own details. In connection with authorising a proxy other than the proxy representative provided by the company, a person also enters the required personal data of the proxy representative into the registration system. Using the personal identity code as a basis, the system compares the data provided with the data in the Sampo plc's Shareholders' Register maintained by Euroclear Finland Oy and selects the ownership information from the Shareholders' Register.

When presenting a counterproposal or a question to the Extraordinary General Meeting by email or mail, the relevant person provides their own details and sufficient information required to verify their status as a shareholder.

5. Who has access to the personal data?

The personal data will not be disclosed by Sampo plc to third parties or transferred outside the EU or European Economic Area. The data will not be disclosed for commercial purposes.

6. How is the personal data protected?

The manual data shall be stored in a locked area with restricted access, either at the premises of Sampo plc or Euroclear Finland Oy, depending on the voting method chosen by the shareholder. Euroclear Finland Oy shall be responsible for the technical maintenance of the register. The connection from a user's browser to the server of Euroclear Finland Oy is encrypted with SSL technology. Technical data protection is used in the application, by which the entered information shall remain unchanged and is available only to authorised persons.

Questions and counterproposals presented to the Extraordinary General Meeting by email are protected in accordance with Sampo plc's best data security practices and access to the email account agm@sampo.fi has been restricted to the fullest extent possible.

7. How long do we store your personal data for?

Personal data will be retained only for as long as necessary to fulfil the purposes it was collected for or as required by applicable legislation. Euroclear Finland Oy retains personal data stored in the registration and voting system for four months from the end of the Extraordinary General Meeting. A list of counterproposals and participants will be annexed to the minutes of the Extraordinary General Meeting. The list includes the name of the shareholder and details on ownership (number of shares and votes). The minutes and its annexes will be stored throughout the operational life of the data controller in order to comply with the data controller's statutory obligations.

8. Right of access and rectification and implementing such rights

Anyone wishing to review or correct their own data or otherwise use their rights under data protection regulations shall present such request in writing and personally signed by regular mail to Fabianinkatu 27, Privacy, 00100 Helsinki or e-mail to privacy@sampo.fi. The request can also be delivered in person to Fabianinkatu 27, 00100 Helsinki. If the request is related to information in the book-entry system maintained by Euroclear Finland Oy, the request shall be addressed to your own account operator in order to exercise your rights.

9. Other rights

If the data subject believes their legal rights have been breached, they have the right to file a complaint with the national Data Protection Authority or another Data Protection Authority within the European Union or the European Economic area. The Data Protection Ombudsman acts as the supervising authority in Finland (tietosuoja.fi/en/home).