

Privacy Notice

This privacy notice describes the personal data processing related to the Annual General Meeting (“AGM”) of Finnair Plc (“Finnair”) to be held on 27 March 2025.

Updated: 25 February 2025

1. Data controller

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

2. Contact person in matters concerning the register

privacy(at)finnair.com

3. Name of the register

Finnair Plc’s Annual General Meeting Register

4. Purposes and legal basis for processing personal data

The purposes of processing personal data are to enable carrying out the Annual General Meeting of the controller according to law, including enabling shareholders of Finnair Plc to register for and vote in advance and in the Annual General Meeting.

Personal data is processed only for the purposes necessary for the organization of the Annual General Meeting, such as to verify the identity of the registrant and their right to participate, preparing the Annual General Meeting’s participant list, a list of votes and possible voting tickets, organizing voting and to manage possible advance questions and requests to speak in the Annual General Meeting. A list of votes will be annexed to the minutes of the Annual General Meeting. The list of votes includes the shareholders represented at the Annual General Meeting.

The technical implementation of the registration system, General Meeting hall bookkeeping and possible advance voting and/or possible voting during the General Meeting is carried out by Innovatics Oy. The list of shareholders is maintained by Euroclear Finland Oy. Inderes Oyj is responsible for the General Meeting service in its entirety. In addition, other service providers are used when needed.

Processing of the personal data is based on the legal obligations of the controller.

5. Data subjects and personal data processed

Personal data is collected from persons who register to the Annual General Meeting of Finnair Plc.

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 AGM 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 Annual General Meeting. When registering via post or e-mail, Finnair Plc 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 Annual 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 Annual General Meeting. The list of shareholders contains the name, municipality, and the number of shares and votes as at the record date of the Annual 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 Annual 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 Annual General Meeting and who need the information for such purposes. The data is not handed over to commercial purposes.

For recipients with Finnish phone numbers, text messages are sent via the service provided by Softera Oy. For those with international numbers, text messages are sent using a Swiss service.

Otherwise, personal data is not transferred or disclosed outside the EU or the European Economic Area.

9. Protection of personal data

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 Annual General Meeting.

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

10. Retention period and erasure of personal data

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

The list of participants of the Annual 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 Annual 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 Notice.

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/>.