

17 February 2025

Processing of personal data in connection with the Annual General Meeting 2025 of Fortum Corporation

In this privacy notice, we inform you about the processing of your personal data that we collect when you register for the Annual General Meeting (“AGM”) of Fortum Corporation (“Fortum”) to be held on Tuesday 1 April 2025 (“AGM Date”), vote in advance, participate in the AGM at the meeting venue and ask questions in the AGM.

Controller:

Fortum Corporation
P.O. Box 100, 00048 FORTUM, Finland.

What are the purposes and legal grounds for processing the personal data?

We process personal data in order to enter AGM registrations in the system, in order for us to verify the person’s identity and their right to participate in the AGM to be held on the AGM Date and to prepare a list of participants. With regard to the voting, we process personal data to allocate a shareholder’s votes to the correct share held by the shareholder, to prepare a list of votes and voting ballots, to organise any voting, and in order to ensure correct voting results of the AGM. In addition, we process certain personal data of shareholders who ask questions in the AGM to manage the requests to take the floor and the questions. Fortum processes personal data in order to comply with its legal obligations and also for exercising its legitimate interests.

What types of and whose personal data does Fortum process?

We only process personal data that is required for the purposes described above. Among these are the following information: contact information, such as name, address, phone number, email address, personal identity code (and the date of birth) / Business ID, the number of shares and votes owned, voting ballot number, voting information, authentication method, basis of representation, date of registration, and possible information on the shareholder’s assistant, power of attorney, and any additional information provided in connection with the registration, as well as the voice of the shareholders that ask questions at the AGM venue. When participating in the AGM, we record the time of arrival and departure of each participant. For technical maintenance and monitoring of the service, we record log data on registration and voting, as well as the user’s IP address. We process personal data relating to a shareholder, their representative and/or proxy representative, assistant, or legal guardian (if any).

The personal data processed also includes i) the list of shareholders on the record date created by Euroclear Finland for the AGM, containing, e.g., the shareholder’s name, personal identity number/business ID, address, and number of shares; and ii) a temporary list of shareholders created by Euroclear Finland for the AGM, containing information about the nominee registered shareholders registered for the AGM and their number of shares.

From which sources are the personal data obtained?

When a shareholder (or their representative and/or proxy representative, assistant, or legal guardian) registers for the AGM online and possibly votes in advance, personal data is received when the shareholder (or their representative and/or proxy representative, assistant, or legal guardian) logs into the system using their personal online banking credentials or a mobile certificate, and he/she also submits information on the online registration and advance voting site himself/herself. When a shareholder registers and votes in advance for the AGM by phone, email or regular mail, Innovatics Oy collects the information required for the registration and the advance votes from the shareholder (or their representative and/or proxy representative, assistant, or legal guardian) on behalf of Fortum and processes the data in the system maintained by Innovatics Oy. Innovatics Oy also enters into the system the voting instructions of the nominee-registered shareholders represented at the AGM by account management organisations. Based on the data provided in connection with the registration, Innovatics Oy retrieves the number of shares of the shareholder on the record date from the list of shareholders created by Euroclear Finland Oy. Data may also be collected directly from the shareholders (or their representative and/or proxy representative, assistant, or legal guardian) participating in the AGM, for example, when they ask questions.

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Who can have access to your personal data?

Your personal data is never accessible to all Fortum employees; access to the data is strictly limited to only those employees who must process the personal data in order to carry out their duties related to the AGM. We also use third parties (such as Innovatics Oy, Inderes Oyj and its affiliate Flik Helsinki Oy, as well as Euroclear Finland Oy) as data processors to help us process personal data. Innovatics Oy carries out the technical implementation of the registration system, AGM hall bookkeeping and possible advance voting and/or possible voting during the AGM. Inderes Oyj is responsible for the AGM service in its entirety. Euroclear Finland Oy maintains Fortum's list of shareholders.

Whenever a third party processes personal data in our name and on our behalf, we ensure by contractual arrangements that your personal data is processed in a secure manner and in accordance with the applicable data protection laws.

Can your personal data be disclosed to third parties or transferred outside the EU or the European Economic Area?

Your personal data is generally not disclosed to third parties. However, if necessary and within the limits allowed by law, your personal data may be disclosed to authorities. Your personal data is never disclosed for commercial purposes.

For those registered for the AGM using a Finnish phone number, text messages are sent via a Finnish service provider. For those with an international phone number, text messages are sent using a Swiss service.

How do we protect your personal data?

We store physical material in a locked room accessible only to persons entitled to the data.

We store the electronic material in a server room that meets the requirements set for the processing of personal data. The connection from the user's browser to the server is encrypted. Access to the personal data is limited to those employees of Fortum and its subcontractors who need and process data to organise the AGM.

How long do we store your personal data?

Personal data processing for the purposes described in this privacy notice, apart from storing the data, will, as a rule, end immediately after the AGM. Innovatics Oy stores your personal data for a maximum of two years after the end of the AGM. Euroclear Finland Oy stores personal data for a maximum of four months after the end of the AGM.

We store the minutes of the AGM and the list of votes attached thereto permanently. It includes the names of shareholders who participated in the AGM, the names of proxies and assistants (if any), the number of shares and votes, and the numbers of the voting ballots.

We destroy other data when they are no longer necessary for drawing up the minutes or verifying their accuracy.

What kind of rights do you have regarding your personal data?

- Right of access to your data. You have a right to be informed whether we process your personal data, and if we do, to receive a copy of your personal data and additional information about processing of personal data carried out by Fortum.
- Right to correction of your data. You have a right to have your incorrect personal data corrected and/or updated.
- Right to erasure of your data. You have a right to have your data erased if:
 - your data is no longer needed for the purposes for which it was collected and otherwise processed, or
 - your data has been unlawfully processed.
- Right to object to and/or restrict processing of your personal data. When processing is carried out on the basis of the legitimate interests of Fortum, you are entitled to object to processing of

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your personal data at any time. You also have the right to request restricting of processing of your personal data for the period during which we review your request.

Contact information:

You can send your questions, comments and requests regarding this privacy notice to the following addresses:

- <https://www.fortum.com/legal/privacy/contact-fortum-privacy-office>; or
- by regular mail: Fortum Corporation, Privacy Office, P.O. Box 100, 00048 FORTUM, Finland.

If you are dissatisfied with how we process your personal data and believe that we have treated your personal data in violation of the applicable personal data protection legislation, you are entitled to lodge a complaint with the Office of the Data Protection Ombudsman. The contact information of the Office of the Data Protection Ombudsman can be found on its official website at www.tietosuoja.fi/en (external link).