

PRIVACY POLICY

§10 and 24 of the Personal Data Act (523/99)

Date of creation: 1 February 2012

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| <p>1. Controller</p> <p>Pohjola Bank plc, business ID 0199920-7 Teollisuuskatu 1 b, 00510 Helsinki Tel.: +358 (0)10 252 011</p> | |
| <p>2. Person in charge and/or contact person</p> | <p>Ari Syrjäläinen</p> <p>Pohjola Bank plc, P.O. Box 308, 00013 Pohjola Tel.: +358 (0)10 252 8495, ari.syrjalainen@pohjola.fi</p> |
| <p>3. Name of data file (</p> | <p>Pohjola Bank plc's data file of General Meeting of Shareholders</p> |
| <p>4. Purpose of processing personal data / purpose of use of data file</p> | <p>The purpose of the data file is to enable Pohjola Bank plc's shareholders to attend a General Meeting of Shareholders. Euroclear Finland Ltd is in charge of the technical implementation of the service. Pohjola requests personal data in order to verify the identity of a shareholder registering for the Meeting, his shareholding and to check his right to attend the Meeting.</p> <p>Personal data will not be disclosed for commercial purposes and the use of the data file will terminate on 27 March 2011 after the Annual General Meeting</p> |
| <p>5. Data file content</p> | <p>If a shareholder registers for the Meeting via the internet, Euroclear Finland Ltd will be in charge of the technical implementation of collecting such data. Data connection from the user's browser to Euroclear Finland Ltd's server is based on SSL encryption. The following data may be collected through this service: name, personal identity code, address, telephone number, email address and book-entry account number</p> <p>Book-entry accounts will be used only for identification within Euroclear Finland Ltd's system and will not be given to the Company. In order to verify the correctness of the voting results, the Company may obtain voting information on an individual shareholder.</p> <p>The following data may be collected when registering for the AGM by telephone: shareholder's name, personal identity code, address, telephone number, the name and personal identity code of any authorised representative and the name of an assistant and, and the name of the person performing the registration</p> |

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| 6. Regular sources of data | <p>A person who registers for the AGM via the internet feeds his personal data. On the basis of the personal identity code provided, the system checks it against that in the Company's Shareholder Register maintained by Euroclear Finland Ltd and collects the person's shareholding information from the Shareholder Register. In case the person authorises someone to represent him at the Meeting, he must also feed the required personal data on the authorised representative.</p> <p>If the person registers for the Meeting by telephone, he must provide the controller with the aforementioned, requested data. On the basis of the personal identity code provided, the system checks it against that in the Company's Shareholder Register maintained by Euroclear Finland Ltd and collects the person's shareholding information from the Shareholder Register.</p> |
| 7. Regular disclosure of data and transfer of data outside the EU or the European Economic Area. | <p>The data are intended for use by the Company only and will not be disclosed to any unauthorised party. The data will not be transferred outside the EU or the European Economic Area.</p> |
| 8. Principles of protecting the data file | <p>Manual data will be stored in a place to which only an authorised person has access.</p> <p>Electronically stored data. Euroclear Finland Ltd is in charge of the technical maintenance of the data file. Data connection from the user's browser to Euroclear Finland Ltd's server is based on SSL encryption. The website uses technical data protection aimed at ensuring that the data entered will remain unchanged and be available only to authorised people.</p> |
| 9. Right of access to personal data and exercise of such right | <p>A shareholder or another registered party has the right to check his data in the database to the extent required by the Personal Data Act. In this connection, the controller must notify the registered shareholder of the regular sources of data in the data file and for what purpose such data are used and where such data are regularly transferred.</p> <p>The related request must be addressed to the person in charge of Pohjola Bank plc's data file by sending a document with a personal signature or a document certified in an equivalent manner.</p> |
| 10. Rectification of data and its implementation | <p>Everyone has the right to request that any incorrect personal data in the data file be rectified. If such incorrect data can be rectified by Euroclear Finland Ltd, the controller will forward the request for rectification to Euroclear Finland Ltd. The controller cannot rectify, for example, incorrect data coming from an account operator. The request for rectification should be made in writing and be as detailed as possible. Requests must be addressed to the person in charge of Pohjola Bank plc's data file.</p> |
| 11. Any other rights | |