

	DESCRIPTION OF THE FILE Personal Data Act (523/1999) Sections 10 and 24
	Date of drafting
	9 June 2016
1 Controller	Name Alma Media Corporation
	Address Alvar Aallon katu 3 C, FI-00100 Helsinki, Finland
	Other contact details (e.g. phone during office hours, e-mail address)
2 Contact in register matters	Sirpa Jyräsalo
	Address Alvar Aallon katu 3 C, FI-00100 Helsinki, Finland
	Other contact details (e.g. phone during office hours, e-mail address) +358 106652220
3 Name of register	Register of managers, their closely associated persons and their transactions referred to in the Market abuse regulation
4 Purpose of processing the personal data	The purpose of the register is compliance with regulation concerning transactions of managers and their closely associated persons in accordance with Article 19 of the regulation ((EU) No 596/2014) on market abuse.
5 Data content of register	The following data is registered for the manager and their closely associated persons: -Name - Position - Nationality - ID - Contact details (telephone number, e-mail address, postal address) - Basis for the closely associated person status - Manager/closely associated person status start and ending date - Manager: Own or family members' controlled entity or entity of influence or other entity - Transaction notifications received from the registered person and their disclosures
6 Regular sources of information	Manager himself/herself and their closely associated persons, public sources of information, such as the Trade Register and the Business Information System
7 Regular destinations of disclosed data	Data can be disclosed to parties referred to in the Market abuse regulation and regulations based on it, which can be, for example, the Financial Supervisory Authority and the Police
8 Transfer of data outside the EU or the EEA	Data is not transferred outside the EU or the EEA.
9 Principles in accordance to which the data file is secured	A Manual material The register is not processed manually. B Data processed through ADP Data processed through an ADP system is stored on a network disk so that the network disk file containing register data can only be accessed by the Alma Media Corporation Board's Secretary, the Corporate Counsel responsible for insider affairs, the Insider Registrar and their substitutes.
10 Right of access	Everyone shall have the right of access, after having supplied

	<p>sufficient search criteria, to the data on him/her in a personal data file, or to a notice that the file contains no such data. Anyone who wishes to have access to the data on himself/herself, shall make a request to this effect to the controller by a personally signed or otherwise comparably verified document or by appearing personally in the premises of the controller.</p>
11 Right to request rectification of data	A possible request to rectify data shall be addressed to the controller's contact person.
12 Other rights related to the processing of personal data	