

## Information for shareholders of Deutsche Beteiligungs AG on data protection

With this notice, we inform you as a shareholder about the processing of your personal data by Deutsche Beteiligungs AG, Untermainanlage 1, 60329 Frankfurt am Main, Germany (hereinafter referred to as "we" or "DBAG") and the rights to which you are entitled under applicable data protection law.

### 1. Who is responsible for data processing?

The data controller responsible for data processing is Deutsche Beteiligungs AG, Untermainanlage 1, 60329 Frankfurt am Main, phone: +49 69 95787-01, e-mail: [datenschutz@dbag.de](mailto:datenschutz@dbag.de).

You can contact the Data Protection Officer of DBAG at: Data Protection Officer of Deutsche Beteiligungs AG, Untermainanlage 1, 60329 Frankfurt am Main, phone: +49 69 95787-01, e-mail: [datenschutz@dbag.de](mailto:datenschutz@dbag.de).

### 2. For what purposes and on what legal basis is your data processed?

We process your personal data in compliance with the EU General Data Protection Regulation (GDPR), the German Federal Data Protection Act (BDSG), the German Stock Corporation Act (AktG) and all other relevant legal provisions. This is only done for the purposes provided for in the AktG. This includes keeping a share register, communicating with shareholders and conducting Annual General Meetings. In detail:

DBAG shares are no-par value registered shares. Section 67 AktG stipulates that such registered shares must be entered in the company's share register, stating the name, date of birth, postal address and electronic address of the shareholder as well as the number of shares. The shareholder is generally obliged to provide the company with this information. If you do not agree to provide this data, you cannot be entered in the share register and cannot exercise your rights as a shareholder.

The credit institutions involved in the acquisition, safekeeping or sale of your DBAG shares regularly forward these and other information relevant for maintaining the share register (e.g. nationality, gender and submitting bank) to the share register. This is done via Clearstream Banking AG, Frankfurt am Main, which, as the central securities depository, handles the technical settlement of securities transactions and the safekeeping of shares for credit institutions.

In connection with the Annual General Meeting, DBAG processes your personal data for the purpose of handling the registration and participation of shareholders in the Annual General Meeting (e.g. verification of the right to participate) and to enable shareholders to exercise their rights in connection with the Annual General Meeting (including the granting, revocation and proof of proxies and instructions). Without the provision of the relevant data, your participation in the Annual General Meeting and the exercise of voting rights and other meeting-related rights is not possible. This includes the following processing operations:

When a shareholder registers for the Annual General Meeting, DBAG processes the required data stored in the share register as well as the data provided by the shareholder or transmitted by his custodian bank for this purpose (in particular first and last name, place of residence or address, number of shares, class of shares, admission ticket number and type of ownership). If requested by a shareholder, DBAG processes the e-mail address provided by the respective shareholder in the Shareholder Portal in order to send invitations to general meetings and other relevant information to the e-mail address. Furthermore, DBAG processes shareholders' addresses in order to send invitations to annual general meetings and other relevant information.

If participation in the Annual General Meeting is by proxy, DBAG processes the personal data of the shareholder specified in the proxy authorisation as well as the first and last name and place of residence or address of the proxy. If a proxy and instructions are issued to a proxy nominated by DBAG, the instructions issued will also be processed and the declaration of proxy will be recorded by the company for three years in a verifiable manner.

In accordance with Section 129 AktG, a list of participants is kept at the Annual General Meeting with the following personal data: Number of the admission ticket, first and last name and place of residence of the shareholder attending or being represented and, if applicable, their representative, number of shares, class of shares, number of voting rights and type of ownership.

If a shareholder requests that items be placed on the agenda, DBAG will announce these items, stating the name of the shareholder, if the requirements under stock corporation law are met. DBAG will also make counterproposals and election proposals from shareholders available on DBAG's website, stating the name of the shareholder, if the requirements under stock corporation law are met (Sections 122 (2), 126 (1), 127 AktG).

In addition to processing in the context of maintaining the share register and holding the Annual General Meeting, your personal data may also be processed to fulfil other legal obligations, such as regulatory requirements and retention obligations under stock corporation, commercial and tax law. The legal basis for the data processing operations described above are the relevant provisions of the German Stock Corporation Act in conjunction with Art. 6 (1) lit. c GDPR.

In individual cases, DBAG also processes your data to protect the legitimate interests of DBAG or a third party pursuant to Art. 6 (1) lit. f GDPR. This is the case, for example, if individual shareholders must be excluded from information on subscription offers in the event of capital increases due to their nationality or place of residence in order not to violate the legal provisions of the countries concerned. In addition, we use your personal data to compile internal statistics (e.g. for the presentation of shareholder development, number of transactions or for overviews of the largest shareholders). DBAG also processes the e-mail address of a shareholder in order to use the "forgot password" function in the DBAG shareholder portal, if and insofar as the respective shareholder so wishes. If it is intended to process your personal data for any other purpose, you will be informed in advance in accordance with the statutory provisions.

### **3. Use of cookies**

Cookies are used when using the shareholder portal website. The purpose of cookies is to personalise the website for the user's visit and to facilitate the use of the website. Cookies are small text files that the website transmits to the cookie file of the Internet browser on the user's device and stores there for later retrieval so that the user is recognised when the website is visited again.

Only technically necessary cookies are used on the website to store server log files. These include

- Name of the retrieved file;
- Date and time of retrieval;
- Message indicating whether the retrieval was successful;
- Description of the type of web browser used;
- Referrer URL (the previously visited website);
- Host name of the accessing computer (IP address).

This data is only stored for the duration of the respective visit to the shareholder portal and then deleted.

Furthermore, a technically necessary cookie is set on the website to ensure a stable connection between the shareholder portal and the associated server. This cookie is stored for twelve hours from the first time the shareholder portal is accessed and is then deleted.

The legal basis for the associated processing of personal data is DBAG's legitimate interest in operating the Shareholder Portal and granting shareholders access pursuant to Art. 6 (1) lit. f GDPR. This data is only stored for the duration of the respective visit to the Shareholder Portal and then deleted.

### **4. Which categories of recipients may your data be passed on to?**

Below we inform you about the categories of recipients to whom we pass on your personal data:

External service providers: We use external service providers for the administration and technical management of the share register and for the organisation of the Annual General Meeting, who process your personal data in accordance with our instructions in accordance with Art. 28 GDPR.

Shareholders/third parties: As part of the statutory right to inspect the list of participants at the Annual General Meeting, shareholders can request to view the data recorded about them in the list of participants for up to two years after the Annual General Meeting. The list of participants will also be made available to

all participants at the Annual General Meeting. Your personal data will also be published in accordance with the statutory provisions in the context of requests for additions to the agenda, countermotions or nominations for election that must be published.

Other recipients: We may be required by law to disclose your personal data to other recipients, such as authorities and courts (e.g. when publishing voting rights notifications in accordance with the provisions of the German Securities Trading Act and notifying authorities to fulfil statutory notification obligations).

**5. How long will your personal data be stored?**

In principle, your personal data will be deleted or anonymised as soon as it is no longer required for the above-mentioned purposes. As soon as we become aware of the sale of your shares, we will only store your personal data for a maximum of twelve (12) months, subject to other legal regulations. Corresponding obligations to provide evidence and/or retain data arise, for example, from the German Commercial Code, the German Fiscal Code or the German Money Laundering Act. In addition, we only retain personal data if this is necessary in connection with legal proceedings in which DBAG is involved or to fulfil our obligations; data collected in connection with the Annual General Meeting is generally retained for three (3) years.

**6. Do we transfer personal data outside Europe?**

We do not transfer your personal data to non-European countries.

**7. Does automated decision-making take place in individual cases (including profiling)?**

We do not use purely automated decision-making processes in accordance with Art. 22 GDPR or profiling.

**8. What rights do you have?**

You have the following rights with regard to the processing of your personal data within the scope of the legal requirements:

- Right to information about the data DBAG has stored about you (Art. 15 GDPR),
- Right to rectification of incorrect data stored about you (Art. 16 GDPR),
- Right to erasure of your data, in particular if it is no longer required for the purposes for which it was originally collected (Art. 17 GDPR),
- Right to restriction of processing (blocking), in particular if the processing of your data is unlawful or the accuracy of your data is disputed by you (Art. 18 GDPR),
- Right to receive your data in a structured, commonly used and machine-readable format (Art. 20 GDPR)
- **Right to object to the processing of your data, insofar as the processing is carried for legitimate interests of the company only (Art. 21 GDPR),**
- Right to lodge a complaint: Our data protection officer is at your disposal for complaints regarding the processing of your personal data. Irrespective of this, you have the right to lodge a complaint with the competent data protection authority. The supervisory authority responsible for DBAG is: The Hessian Commissioner for Data Protection and Freedom of Information, Gustav-Stresemann-Ring 1, 65189 Wiesbaden, Postfach 31 63, 65021 Wiesbaden, [www.datenschutz.hessen.de/kontakt](http://www.datenschutz.hessen.de/kontakt)