



## Data protection information for shareholders and shareholder representatives

GFT Technologies SE takes the protection of your personal data very seriously. With the following information, we would like to inform you about the processing of your personal data and the rights to which you are entitled under data protection law.

We process your personal data in compliance with all relevant legal standards, in particular the EU General Data Protection Regulation (GDPR), the German Stock Corporation Act ('Aktiengesetz' - AktG), the German Act regarding Measures under the Law of Corporations, Cooperatives, Associations, Foundations and Residential Property to Combat the Effects of the COVID-19 Pandemic ('Gesetz über Maßnahmen im Gesellschafts-, Genossenschafts-, Vereins-, Stiftungs- und Wohnungseigentumsrecht zur Bekämpfung der Auswirkungen der COVID-19-Pandemie' - GesRuaCOVBekG) and the German Federal Data Protection Act ('Bundesdatenschutzgesetz' - BDSG).

### Who is responsible for data processing?

GFT Technologies SE  
Schelmenwasenstr. 34  
70567 Stuttgart  
Germany  
Tel: +49 711 62042-440  
Fax: +49 711 62042-301  
E-mail: [ir@gft.com](mailto:ir@gft.com)

### What are the contact details of the Data Protection Officer?

GFT Technologies SE  
Data Protection Officer  
Schelmenwasenstr. 34  
70567 Stuttgart  
Germany  
E-mail: [datenschutz@gft.com](mailto:datenschutz@gft.com)

### Which personal data is collected?

If you register as a shareholder or shareholder representative for the Annual General Meeting or grant power of attorney to a proxy, we will process the following personal data about you and/or about your representative or the third party nominated by you:

- First and last name of the shareholder and, if applicable, of the third party
- First and last name of the holder of the securities account and the number of the securities account
- Contact details (e.g. address, e-mail address)
- Share-related data (e.g. number of shares, type of ownership of shares)
- AGM-related data (e.g. registration number, voting, day and time of voting, powers of attorney and instructions issued, first and last name of the person who voted)



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

The shares of GFT Technologies SE are bearer shares. In accordance with article 21 of the Articles of Incorporation of GFT Technologies SE and section 123 AktG, shareholders are required to register for the Annual General Meeting. As a rule, the custodian banks or the ultimate intermediaries and/or intermediaries provide us with the necessary personal data for participation in the Annual General Meeting. The personal data of shareholders and shareholder representatives is processed for the purposes provided for or stated in the German Stock Corporation Act (AktG), in particular section 67e (1) AktG, especially for the processing of the virtual Annual General Meeting pursuant to section 1 GesRuaCOVBekG in conjunction with sections 118 et seq. AktG. To this extent, the processing is necessary for the fulfilment of legal obligations pursuant to article 6 (1) point c) GDPR.

In addition, we may also process your personal data to comply with other legal obligations, such as regulatory requirements and retention obligations under stock corporation, commercial and tax law. For example, in order to comply with the provisions of stock corporation law, we need to keep a verifiable record of the data used to prove the authorisation of proxies appointed by the company for the Annual General Meeting. In this case, the legal basis for processing is section 134 (3) AktG, so that this processing is also necessary for the fulfilment of legal obligations pursuant to article 6 (1) point (c) GDPR.

In individual cases, we also process your data to protect our legitimate interests pursuant to article 6 (1) point (f) GDPR.

### **Which categories of recipients do we share your data with, if any?**

In order to hold the Annual General Meeting, and in particular to facilitate the provision of the GFT shareholder portal, we use external service providers who are bound by order processing agreements to comply with data protection regulations (article 28 GDPR). These service providers only receive the personal data required for the execution of the respective order and process this data exclusively in accordance with our instructions. Additional information on data processing when using the GFT shareholder portal can be found there under '*Data protection policy*'.

In addition, personal data is made available to shareholders and shareholder representatives within the scope of the statutory provisions, namely via the list of participants pursuant to section 129 (4) in conjunction with (1) sentence 2 AktG. In connection with the announcement of shareholder requests for additions to the agenda, as well as countermotions or election nominations by shareholders, personal data may be published on publicly accessible channels, such as the company's website and/or the Federal Gazette ('Bundesanzeiger') in accordance with legal requirements.

Moreover, we may be obliged to transmit your personal data to further recipients, such as supervisory authorities for the fulfilment of legal obligations.

Your data will not be stored by us outside the European Economic Area.

### **How long do we store your personal data?**

For personal data collected in connection with Annual General Meetings, the storage period is generally up to three years. Beyond this, we only retain personal data in specific cases, in particular if this is necessary in connection with claims asserted against our company or insofar as statutory obligations to provide proof and to retain data (e.g. under the German Stock Corporation Act ('Aktengesetz'), the German Commercial Code ('Handelsgesetzbuch') or the German Fiscal Code ('Abgabenordnung')) oblige us to continue to store such data.



If we become aware that you are no longer a shareholder of the company, we will only store your personal data for a maximum of twelve months in accordance with section 67e (2) AktG, subject to other statutory provisions. This does not apply for as long as storage is necessary for legal proceedings.

### **What are your data protection rights?**

As a data subject, you may contact us at any time under the legal requirements with an informal communication using the above contact details in order to exercise your rights, the requirements of which must be checked in each individual case, in accordance with GDPR and, if applicable, the German Stock Corporation Act (AktG). You have the right to:

- information about your personal data (article 15 GDPR), as far as there is no exception according to section 34 BDSG,
- information about the origin of the data, the purpose and the end of the processing, the details of the data controllers, the data processors and the parties to whom the data is disclosed,
- rectification of inaccurate data or completion of incomplete data (article 16 GDPR and section 67e (4) AktG),
- erasure of personal data if it is no longer needed to fulfil the above-mentioned purposes (article 17 GDPR), unless there is a restriction under section 35 BDSG,
- restriction of data processing (article 18 GDPR),
- data portability by making it accessible in electronic form (article 20 GDPR),
- information about your right to object according to article 21 GDPR,
- object to the processing of your personal data (article 21 GDPR), see the text in italics below for more details,
- lodge a complaint with us and/or the competent data protection authority (article 77 GDPR).

### ***Right to object pursuant to article 21 GDPR***

***You have the right to object, on grounds relating to your particular situation, at any time to the processing of personal data concerning you which is based on article 6 (1) point (f) GDPR (data processing on the basis of legitimate interest). If you object, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing serves the purpose of asserting, exercising or defending legal claims.***

### **Am I obliged to provide the personal data requested?**

In order for you to participate in the Annual General Meeting and/or exercise shareholder rights and, in particular, to vote, the processing as well as the collection of your personal data is absolutely essential. **Would you like to complain about the handling of your data?**

You have the possibility to contact our Data Protection Officer (see above) or a data protection supervisory authority. The data protection supervisory authority responsible for GFT Technologies SE is:

Landesbeauftragter für den Datenschutz und die Informationsfreiheit von Baden-Württemberg  
Address: Lautenschlagerstraße 20, 70173 Stuttgart  
Postal address: Postfach 10 29 32, 70025 Stuttgart  
Tel: +49 711 615541-0

Fax: +49 711 615541-15

Internet [www.baden-wuerttemberg.datenschutz.de/](http://www.baden-wuerttemberg.datenschutz.de/)