

NON-BINDING CONVENIENCE TRANSLATION

Data Privacy Notice for shareholders of secunet Security Networks AG and for authorised representatives of shareholders with regard to data processing for purposes of the virtual General Meeting

1. General Information

a) Introduction

secunet Security Networks AG takes your privacy and the protection of your personal data very seriously. In this data privacy notice, we want to inform you about which personal data we process from you as our shareholder or your authorised representative in connection with the preparation, conduct and follow-up of our virtual General Meeting and which rights you have under Regulation EU 2016/679 (General Data Protection Regulation – GDPR) and the German Federal Data Protection Act (*Bundesdatenschutzgesetz*, BDSG) with regard to the processing of your data.

We will conduct the Annual General Meeting in 2022 as an assembly without presence using means of remote communication (virtual General Meeting) with the possibility of following the virtual General Meeting by means of electronic connection (Connection). Shareholders and their authorised representatives can therefore not physically participate in the General Meeting. However, they can follow the entire General Meeting by video and audio transmission via a special online portal, which also provides additional functions for shareholders and their authorised representatives as described in more detail below (AGM-Portal). The AGM Portal is operated by our service provider Link Market Services GmbH, Landshuter Allee 10, 80637 Munich, exclusively on our behalf and on our instructions. It can be accessed via www.secunet.com/ueber-uns/investoren/hauptversammlung.

b) Data controller for the processing of personal data

Data controller for the processing of your personal data is:

secunet Security Networks AG
Kurfürstenstraße 58
45138 Essen
Phone: +49 (0) 201 5454 0
Telefax: +49 (0) 201 5454 1000
Email: info@secunet.com

c) Contact details of the Data Protection Officer

Madina Utova
secunet Security Networks AG
Kurfürstenstraße 58
45138 Essen
Email: datenschutz@secunet.com

2. Information regarding the processing of your personal data

a) Categories of data

We process the following data of our shareholders with regard to the virtual General Meeting:

- name and surname, title

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- Information on your share portfolio (share class, depository bank, type of share ownership, number of shares)
- Individual access data for the AGM portal, if applicable voting card number
- Other data provided in connection with registration for the Annual General Meeting (e.g. email address or phone number)

In addition, we process the name and address of the representative authorised by the shareholder, if applicable.

If shareholders or their authorised representatives contact us, we also process the personal data required to respond to the respective request, such as the email address or phone number.

We also process information on motions, questions, election proposals and other requests submitted by shareholders or their authorised representatives in relation to the Annual General Meeting, as well as on their voting behaviour.

When you access our AGM Portal, we collect data about accesses to our AGM Portal. The following data and device information are logged in the web server logs:

- Retrieved or requested data;
- Date and time of the retrieval;
- Message, whether the retrieval was successful;
- Accessed URL;
- Type of web browser and the operation system used;
- Referrer URL (the previously visited webpage), if your browser sends it;
- IP address;
- Port used for access;
- Actions performed within the portal;
- Individual access data and session ID or session data;
- Login and logout with respective time stamp; and
- Acceptance of the terms of use.

Your browser automatically transmits this data to us when you visit our AGM-Portal.

b) Purposes and legal basis of the processing

Via the AGM portal, you can, among other things, follow the virtual AGM in video and audio, issue proxies for representatives, submit questions, declare objections for the record or, if you are entitled to vote, exercise your voting rights. To use the AGM portal, you must log in with your individual access code, which will be sent to you with your voting card. The various options for exercising your rights will then appear in the form of buttons on the user interface of the AGM portal.

aa) Operation of the AGM Portal

The processing of the aforementioned access data and device information in the webserver log files is necessary in order to be able to provide the AGM Portal technically as well as for misuse detection, troubleshooting and to ensure the proper course of the virtual Annual General Meeting. In this respect, we have a legitimate interest in providing you with the AGM Portal as a service for shareholders and their authorized representatives in order to exercise your shareholder rights in a user-friendly manner

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and to be able to participate in the virtual AGM by means of electronic communication. The legal basis for these processing operations is with regard to the shareholders Article 6 (1) sentence 1 (c) GDPR in conjunction with Section 67e (1) German Stock Corporation Act (AktG) and with regard to the shareholder representatives Article 6 (1) sentence 1 (f) GDPR.

bb) Identity verification

When you register on the AGM Portal, we process your registration information and access data in order to verify your entitlement to connect to the virtual General Meeting or to take preparatory measures as a shareholder or authorised representative.

The processing is required to fulfil our obligations under stock corporation law in accordance with Sections 118 et seqq. AktG. The legal basis for the processing is Article 6 (1) sentence 1 (c) GDPR in conjunction with Section 67e (1) AktG. If you do not provide the required personal data, we will not be able to connect you to the virtual General Meeting via the AGM Portal, nor will we be able to allow you to vote by (electronic) postal vote, issue authorizations for representatives (in particular to the Company proxies), submit questions, or lodge any objections to the record.

cc) Preparation, conduct and follow-up of the virtual General Meeting

Your personal data is processed for the purpose of preparing, conducting and following up on the virtual General Meeting, in particular for managing shareholders' and their authorised representatives' registration for and connection to the virtual General Meeting (e.g. verification of authorisation to exercise shareholder rights and to connect via the AGM Portal, creation of the list of attendees, sending access data) and allowing shareholders and their authorised representatives to exercise their rights in connection with the virtual General Meeting (including the granting and revocation of proxies and instructions).

In particular, we also process information on your voting behaviour, provided that you or your authorised representative exercise your voting rights before or during the virtual General Meeting by electronic postal vote or via the voting function in the AGM Portal, in order to ensure the lawful adoption of resolutions and evaluation of cast votes at the virtual General Meeting. In addition, we process information on your objection to resolutions of the virtual General Meeting, if you declare such objection during the virtual General Meeting using the corresponding function of the AGM Portal. Furthermore, we process your personal data in order to fulfil our obligations towards shareholders and their authorised representatives (e.g. sending electronic confirmation of votes exercised by electronic postal vote).

The legal basis for the processing is Article 6 (1) sentence 1 (c) GDPR in conjunction with Section 67e (1) AktG and our obligations under stock corporation law pursuant to Sections 118 et seqq. AktG and, if applicable, in connection with Section 1 (2) sentence 1 nos. 2 - 4 of the Act on Measures in Corporate, Cooperative, Association, Foundation and Home Ownership Law 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).

The processing of your personal data is necessary for the proper conduct of the virtual General Meeting. If you do not provide us with the necessary personal data, we may not be able to connect you to the virtual General Meeting.

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In connection with the preparation, conduct and follow-up of the virtual General Meeting, we may also transfer your data to our legal advisors, tax advisors or auditors, as we have a legitimate interest to organize the virtual General Meeting in accordance with the relevant legal provisions and in obtaining external advice on this. The legal basis for this processing is Article 6 (1) sentence 1 (f) GDPR.

dd) Creation of the list of attendees and granting of access

If you authorise the Company proxy appointed by us for the Annual General Meeting, we will include your name or company, place of residence or registered office, the number of your shares, the type of ownership and the granting of this authorisation in the list of attendees for the Annual General Meeting. The list of participants will be available for access by duly registered shareholders and their authorised representatives on the AGM Portal during the Annual General Meeting. The list of attendees may also be accessed by any shareholder on request up to two years after the Annual General Meeting. Thus, we comply with our legal obligation to create a list of attendees and to grant access to it, and we also pursue the legitimate interest to ensure that the virtual General Meeting is conducted transparently. The legal basis for creating the list of attendees and granting access to it after the Annual General Meeting is Article 6 (1) sentence 1 (c) GDPR and our corresponding obligations under stock corporation law pursuant to Section 129 (1) sentence 2 and (4) sentence 2 AktG. The legal basis for making the list of attendees available on the AGM Portal is Article 6 (1) sentence 1 (f) GDPR.

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ee) Exercise of right to submit questions

If you as a shareholder make use of the option to submit questions via our AGM Portal in advance of the virtual General Meeting and your questions are dealt with at the virtual General Meeting, your name will generally be mentioned and can be noted by other participants in the virtual General Meeting. This processing is necessary to pursue our legitimate interest in making the virtual General Meeting as similar as possible to a physical Annual General Meeting and the legitimate interest of the other participants in the Annual General Meeting in knowing the name of a questioner. The legal basis for this processing is Article 6 (1) sentence 1 (f) GDPR. If you do not agree with such disclosure of your name, you may object to the disclosure of your name for grounds relating to your particular situation already when submitting the question. If possible, please note this by entering a corresponding statement in the question input mask. The information below regarding your data subject rights remain unaffected.

ff) Processing to fulfil legal reporting and publication obligations (in particular voting rights notifications)

Your personal data are also processed to fulfil legal reporting and publication obligations (in particular voting rights notifications). The legal basis for the processing in these cases are the respective legal provisions in conjunction with Article 6 (1) sentence 1 (c) GDPR.

gg) Processing to comply with further legal obligations, in particular retention obligations

In addition, your personal data may also be processed in order to comply with other legal obligations, such as regulatory requirements and obligations to retain data under stock corporation, commercial and tax law. For example, we are obliged to keep a verifiable record of the declaration of power of attorney to the Company proxy named by us for the Annual General Meeting for three (3) years. In these cases Article 6 (1) sentence 1 (c) GDPR in conjunction with the relevant statutory provisions constitutes the relevant legal basis.

hh) Providing corporate information and maintaining contact with shareholders (Investor Relations)

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Your personal data may also be processed for the purpose of providing corporate information and maintaining contact with our shareholders (Investor Relations). The legal basis for this processing is Article 6 (1) sentence 1 (c) GDPR in conjunction with Section 67e (1) AktG.

jj) Cookies

For our AGM Portal we use technically necessary cookies. Cookies are small files that are placed on your desktop, notebook or mobile device by a website you visit. This enables us to recognise, for example, whether there has already been a connection between your device and our AGM. Cookies can contain personal data. You can set your browser so that you are informed about the setting of cookies and only allow cookies in individual cases, exclude the acceptance of cookies for certain cases or in general and activate the automatic deletion of cookies when closing the browser. If you decide against the use of cookies, you may not be able to use all the functions of our AGM Portal or some functions may only be available to you to a limited extent.

The necessary session cookies we use are only used for the purpose of providing the AGM portal and for the registration and identification of shareholders and their authorised representatives. They are strictly necessary for the functions of the AGM Portal and are deleted when you close your browser.

The setting of and access to the data stored in strictly necessary cookies, as well as the processing of personal data associated with these cookies, are necessary for our legitimate interest to enable our shareholders and their authorised representatives to use the AGM Portal. The legal basis for this processing is Article 6 (1) sentence 1 (f) GDPR.

If we want to use cookies in the AGM Portal that are not strictly necessary for the operation of the AGM Portal, such as function or performance cookies, we will only do so if you have given your consent. In this case, before using cookies we will inform you by means of a cookie banner about our cookies and associated data processing when you visit the AGM Portal and ask for your consent.

c) Categories of recipients of personal data

Service providers of the company who are commissioned for the purposes of preparation, conduct and follow-up of the virtual General Meeting (e.g. for printing and sending the invitations to the Annual General Meeting and shareholder notifications as well as for providing the AGM Portal via which the virtual General Meeting is accessible) only receive such personal data from the company that is necessary for the performance of the commissioned service and they process the data exclusively on behalf and on the instructions of secunet Security Networks AG. All our employees and all employees of external service providers who are having access to and/or are processing the personal data are obliged to treat this data confidentially. In connection with the preparation, conduct and follow-up of the Annual General Meeting, we may also transfer your personal data to our legal advisors, tax advisors or auditors.

If we include your above-mentioned data in the list of attendees of the Annual General Meeting, this data can be accessed in the AGM Portal during the Annual General Meeting by any properly registered shareholder and their authorised representatives, and thereafter for up to two years by any shareholder upon request.

If a shareholder requests that matters are placed on the agenda, we will publish these matters by disclosing the name of the shareholder if the requirements of the provisions of stock corporation law are met. Countermotions and election proposals from shareholders will also be made available on the

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company's website together with the name of the shareholder in accordance with the provisions of stock corporation law, if the requirements are met.

If you as a shareholder make use of the right to submit questions, your questions – together with your name – may be dealt during the virtual General Meeting. All participants of the Annual General Meeting may take note of that.

Finally, we may be required to disclose your personal data to additional recipients, such as when publishing notifications of voting rights in accordance with the provisions of the German Securities Trading Act, or to authorities for the purpose of fulfilling legal notification obligations (e.g., to financial or law enforcement authorities).

Your personal data will be processed solely within the European Union.

3. Data sources

We or the services providers commissioned by us, receive the personal data of the shareholders either from the shareholders themselves, or via our registration unit from the shareholders' credit institutions that they have commissioned to hold our shares in safe deposit (so-called depositary shares). If you act as authorised representative of a shareholder, we receive your personal data from the shareholder who has granted you the proxy, and directly from you, insofar as your conduct during the virtual General Meeting or your use of the AGM Portal is concerned.

4. Security measures and storage duration

secunet Security Networks AG implements extensive technical and organisational security measures (TOMs) to ensure that your personal data is not compromised by accidental or intentional manipulation, loss or destruction or disclosed to unauthorised third parties. Our security measures are continuously improved and adapted according to the state of the art.

The data will be stored for the aforementioned purposes or to the extent required by law and will be deleted once the purpose has been fulfilled. To the extent required by law (e.g. due to legal obligations to provide proof or legal retention obligations in accordance with the AktG, the German Commercial Code, the German Fiscal Code or other legal provisions) or to the extent the company has a legitimate interest in storing personal data, for example in the event of disputes in or out of court on the occasion of the Annual General Meeting, the data may be stored for a longer period.

5. Rights of data subjects

As a data subject, shareholders and authorised representatives of shareholders can contact our data protection officer named in Section 1. c) in order to exercise their legal rights in accordance with the GDPR. If the legal requirements are met, they may be entitled to the following rights:

- the right of access regarding the processing and the right to rectification (Art. 15 GDPR, Art. 16 GDPR),
- the right to erasure of personal data (Art. 17 GDPR),
- the right to restriction of processing (Art. 18 GDPR),
- the right to data portability (Art. 20 GDPR)
- the right to lodge a complaint to the competent supervisory authority (Art. 77 GDPR)

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Where we process your personal data for the purposes of the legitimate interests pursued by secunet Security Networks AG or a third party, you have the right to object to this processing on grounds relating to your particular situation. In this case, we will no longer process your personal data unless we demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or the processing serves the purpose of establishing, exercising or defending legal claims.

secunet Security Networks AG
The Board of Directors