

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 Annual 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 Annual 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.

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 Annual General Meeting:

- name and surname, title
- address and, if applicable, a different delivery address
- Information on your share portfolio (share class, depository bank, type of share ownership, number of shares)
- entrance 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.

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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.

b) Purposes and legal basis of the processing

The processing of your data serves the overriding purpose of fulfilling our obligations under stock corporation law in accordance with Sections 118 et seq. German Stock Corporation Act (AktG). The legal basis for the processing is Art. 6 para. 1 sentence 1 lit. c) GDPR in conjunction with Section 67e para. 1 AktG, Section 129 para. 1 sentence 2 and para. 4 sentence 2 AktG. Based on this obligation, we process data for the following purposes:

- Verification of the identity of shareholders and their proxies (e.g. by checking their eligibility to attend the Annual General Meeting),
- cc) Preparation, conduct and follow-up of the Annual General Meeting (e.g. preparation of the list of attendees, dispatch of voting cards)
- 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 attendees may also be accessed by any shareholder on request up to two years after the Annual General Meeting.
- Exercise of right to submit questions (e.g. the disclosure of the name of the questioner. The legal basis for this processing is Art. 6 para. 1 sentence 1 lit. f) GDPR),
- Processing to fulfil legal reporting and publication obligations (in particular voting rights notifications),
- Processing to comply with other legal obligations, in particular retention obligations (e.g. due to regulatory requirements and retention obligations under stock corporation, commercial and tax law)
- Providing corporate information and maintaining contact with shareholders (Investor Relations).

If you do not provide the required personal data, we will not be able to allow you to participate in the Annual General Meeting.

In connection with the preparation, implementation and follow-up of the Annual General Meeting, we may also transfer your data to our legal advisors, tax advisors, AGM service providers or auditors, as we have a legitimate interest in organizing the Annual General Meeting in accordance with the relevant legal provisions and in obtaining external advice for this purpose. The legal basis for this processing is Art. 6 para. 1 sentence 1 lit. f) GDPR.

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 Annual General Meeting 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

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behalf and on the instructions of secunet Security Networks AG. Where relevant, secunet concludes agreements with its service providers for order processing within the meaning of Art. 28 GDPR. 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 you attend the Annual General Meeting, we are obliged pursuant to Section 129 (1) sentence 2 AktG to enter your name, place of residence, number of shares and type of ownership in the list of attendees. This data can be accessed 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 company's website together with the name of the shareholder in accordance with the provisions of stock corporation law, if the requirements are met.

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 depository 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 Annual General Meeting 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

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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)

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