

## **Data protection information for shareholders of Deutsche EuroShop AG**

(As at May 2020)

New data protection regulations came into force on 25 May 2018, when the EU's General Data Protection Regulation entered into effect. The following information is intended to inform you, as shareholders, about the processing of your personal data by Deutsche EuroShop AG (hereinafter referred to as "we" or "us") and your rights under data protection law.

### **Who is responsible for data processing?**

Deutsche EuroShop AG  
Heegbarg 36  
D-22391 Hamburg  
Germany  
Tel.: +49 (40) 41 35 79-0  
Fax: +49 (40) 41 35 79-29  
E-mail: [info@deutsche-euroshop.de](mailto:info@deutsche-euroshop.de)

### **What is the purpose of data processing and on which legal basis will your data be processed? Where do we get your data from?**

We process your personal data in accordance with the EU's General Data Protection Regulation (GDPR), the Bundesdatenschutzgesetz (BDSG neu – the new German Federal Data Protection Act), the Aktiengesetz (AktG – German Public Companies Act) and all other relevant laws and regulations.

#### **1. Registered shares and management of the share register**

The shares of Deutsche EuroShop AG are no-par-value registered shares. Section 67 AktG provides that such registered shares must be entered in the company's share register, stating the name, date of birth and address of the shareholder and the number of shares held. Shareholders are required to provide this information to the company. New registered shares may be issued in the event of a capital increase. The banks involved in the acquisition, safekeeping or sale of your Deutsche EuroShop AG shares regularly forward this information and other details relevant to the management of the share register (e.g. nationality, gender and submitting bank) to the share register and the central securities depository, which perform the management of the share register, the technical processing

of securities transactions and the safekeeping of the shares for credit institutions. For this purpose, we process your personal data because this is necessary for compliance with a legal obligation on the basis of article 6 (1) sentence 1 c) GDPR.

## 2. Annual General Meetings

You can register for the Annual General Meeting, issue proxy authorisations and instructions to the company's proxies and exercise your other rights at the Annual General Meeting either online or by post or fax. For this purpose, we process your personal data because this is necessary for compliance with a legal obligation on the basis of article 6 (1) sentence 1 c) GDPR or, if provided for in the Articles of Association, for the performance of a contract on the basis of article 6 (1) sentence 1 b) GDPR.

## 3. Video and audio broadcasts from the Annual General Meeting

As provided for in the Articles of Association of Deutsche EuroShop AG, video and audio footage of the Annual General Meeting can be broadcast under certain circumstances. For this purpose, we process your personal data for the performance of a contract on the basis of article 6 (1) sentence 1 b) GDPR.

## 4. Material orders and newsletter mailings

You can request material from us, such as the annual report, which we will then send to you. You can also subscribe to newsletters. For this purpose, we process your personal data with your consent on the basis of article 6 (1) sentence 1 a) GDPR.

## 5. Identification of your needs and communication with you

We will also use your data to prepare statistics, e.g. to analyse trends, and for communicating with you. We process your personal data based on our legitimate interest in learning about your needs and contacting you, on the basis of article 6 (1) sentence 1 f) GDPR.

## 6. Compliance with other legal obligations

Your personal data may also be processed to meet further legal obligations such as regulatory requirements and retention obligations under company, commercial and tax law. For example, when authorising the proxies nominated by the company for the Annual General Meeting, the rules require that the data which serve as proof of authorisation be verifiably recorded and stored for three years in a restricted-access manner (section 134 (3) sentence 5 AktG). Your personal data are processed in order to comply with a legal obligation on the basis of article 6 (1) sentence 1 c) GDPR.

## 7. Other legitimate interests

In individual cases, we also process your data to pursue legitimate interests on the basis on article 6 (1) sentence 1 f) GDPR. For example, this is the case if, in the event of capital increases, individual shareholders have to be excluded from receiving information on subscription offers due to their nationality or place of residence in order to comply with securities regulations of the countries concerned.

## 8. Change of purpose

If we plan to process your personal data for another purpose, you will be informed of this in advance in accordance with the statutory provisions.

### **To which categories of recipients could your data be disclosed?**

#### 1. External service providers

CAPTRACE GMBH, Wiesbaden, Germany, is commissioned with the management of the share register. Clearstream Banking AG, Frankfurt, Germany is the central securities depository. The Annual General Meeting is organised by Better Orange IR & HV AG, Munich, Germany. These companies process your data exclusively in accordance with the instructions they receive from Deutsche EuroShop AG.

#### 2. IT service providers

If we process your personal data electronically, we may use the infrastructure of external IT service providers.

#### 3. Delivery services

If we send you material and documents by mail, we disclose your personal data to the delivery service provider.

#### 4. Other recipients

In addition, it may be necessary to disclose your personal data to other recipients insofar as this is necessary for compliance with legal obligations. If you attend the Annual General Meeting, other shareholders of Deutsche EuroShop AG can view the personal data recorded about you in the list of participants required by company law, in accordance with section 129 AktG.

### **How long will your data be stored?**

The retention period is normally up to three years for any data collected in connection with

Annual General Meetings. The data recorded in the share register are normally stored for ten years following the sale of the shares. Beyond that, we only store personal data if this is necessary in connection with claims filed against the company (statutory limitation period of up to 30 years). The personal data processed in order for you to exercise your rights under the GDPR will be stored for the duration of our accountability. Your personal data will always be deleted or made anonymous as soon as they are no longer required for the above-mentioned purposes and we no longer have a legal obligation to produce proof or to continue storing them.

### **What are your rights?**

1. In accordance with the GDPR, you may at any time request that we
  - provide you with information about the personal data concerning you that we process (article 15 GDPR),
  - rectify personal data concerning you that are inaccurate (article 16 GDPR) and/or
  - erase (article 17 GDPR), restrict (article 18 GDPR) and/or hand over (article 20 GDPR) any personal data we have stored concerning you.
  
2. If you have an enquiry regarding any of the issues addressed in section 1 above, please send it
  - by email to [info@deutsche-euroshop.de](mailto:info@deutsche-euroshop.de) or
  - by letter to Deutsche EuroShop AG, Heegbarg 36, 22391 Hamburg.
  
3. If you assert your rights under section 1, we will process the personal data concerning you which we have collected in this regard in order to respond to your enquiry. Your personal data will be processed in order to comply with a legal obligation on the basis of article 6 (1) sentence 1 c) GDPR.

Without prejudice to your rights as defined in section 1 above, you have the right to lodge a complaint with a supervisory authority if you believe that Deutsche EuroShop AG's processing of personal data concerning you infringes the GDPR (article 77 GDPR).

### **Consent and withdrawal of consent**

1. If you have granted us your consent to process your personal data, you are entitled to withdraw such consent at any time. The withdrawal of consent shall apply to the future. The legality of the processing of your personal data shall remain unaffected up to the time of such withdrawal. Please send any withdrawal of consent using the contact information listed in the section entitled "What are your rights?".

2. If you withdraw your consent, we will process the personal data concerning you which we collected in this regard in order to respond to your enquiry. Your personal data will be processed in order to comply with a legal obligation based on article 6 (1) sentence 1 c) GDPR.

#### **Legitimate interests in data processing and objection**

1. We process your personal data based on our legitimate interest in learning about your needs and contacting you.
2. Where we process your personal data on the basis of this legitimate interest (article 6 (1) sentence 1 f) GDPR), you have the right at any time to object to the processing of your personal data without stating grounds in the event of direct marketing, and otherwise for reasons relating to your personal situation. We will cease processing your data for these purposes, unless our legitimate interests override your interests or processing is for the establishment, exercise or defence of legal claims. Please address enquiries to:

Deutsche EuroShop AG  
Heegbarg 36  
D-22391 Hamburg  
Germany  
Tel.: +49 (40) 41 35 79-0  
Fax: +49 (40) 41 35 79-29  
Email: [info@deutsche-euroshop.de](mailto:info@deutsche-euroshop.de)

3. If you object to the processing of data in accordance with section 2 above, we will process the personal data concerning you which we have collected in this regard in order to respond to your enquiry. Your personal data will be processed in order to comply with a legal obligation on the basis of article 6 (1) sentence 1 c) GDPR.

We will notify you of any relevant changes to this information as the need arises.