

Vantage Towers AG Privacy Notice for Shareholders (in accordance with Art. 13 GDPR)

By providing the information below, Vantage Towers AG (hereafter “we”, “us” “our”) would like to inform our shareholders, shareholder representatives and guests who may attend our Annual Shareholders’ Meetings (hereafter “you”, “your”, “yours”), about the processing of your personal data and the rights accruing to you under data protection law.

CONTROLLER FOR PROCESSING PERSONAL DATA

Vantage Towers AG

Prinzenallee 11-13

40549 Düsseldorf

Germany

DATA PROTECTION OFFICER

Vantage Towers AG

Prinzenallee 11-13

40549 Düsseldorf

Germany

E-Mail: privacy@vantage-towers.com

PURPOSE AND LEGAL BASIS OF PROCESSING PERSONAL DATA

What personal data do we collect?

Management of the share register - We process the following personal data: your shareholder data (surname, first name, date of birth, address, e-mail address), your nationality, profession, telephone number, the number of shares you hold, your shareholder number as well as the date of acquisition of the shares, the date of change of shares, ownership type, the depository of your shares and the depositing bank. Your personal data will be transmitted to us by Clearstream Banking AG, which undertakes the technical settlement of securities transactions and the safekeeping of the shares for intermediaries (e.g. credit institutions). If you sell your shares, Clearstream Banking AG will inform us accordingly.

Annual Shareholder Meeting - In relation with the annual shareholder meeting, we process your above-mentioned shareholder data as well as further information on voting, power of attorney and instructions, as well as on the possible submission of questions, motions or objections prior to or during the shareholder meeting. If a virtual annual shareholder meeting takes place via our shareholder portal, we also process the data listed below under "Shareholder Portal".

Shareholder Portal - If you or your authorised representative visit our shareholder portal, we collect additional data and device information as to the access to the shareholder portal, which will be logged in the web server log files. Such data includes the following:

- (a) • Data for registration in the shareholder portal: access code;
- (b) • Web Storage Data: Authentication Token, Session Data, Login Time Stamp;
- (c) • Server Logfiles: name of the retrieved file, date and time of retrieval, message whether the retrieval was successful, type of web browser used, referrer URL, IP address.

Your browser automatically transmits such data to us when you visit the shareholder portal.

Authorised representatives and guests – We process the names, first name and address of any authorised representative or guest of the annual shareholder meeting.

For what purpose do we process your personal data?

Management of the share register - § 67 AktG obliges every shareholder to provide us with personal data for the purpose of maintaining the legally required share register. In this respect, the legal basis for processing personal data is Article 6 (1) sentence 1 lit.c) GDPR.

Carrying out the annual shareholder meeting – We process your personal data for the purpose of organizing shareholder meetings. The legal basis for this is Article 6 (1) sentence 1 lit.c) GDPR and, further, Article 6 (1) sentence 1 lit. f) GDPR.

Using the shareholder portal – If you use our shareholder portal, we process your data for the purpose of performing individual functions in our shareholder portal. Depending on the circumstances the legal basis is Article 6 (1) sentence 1 lit.c) GDPR and/or the safeguarding of legitimate interests pursuant to Article 6 (1) sentence 1 lit. f) GDPR. If you have given your consent to the electronic submission of the invitation to the annual shareholder meeting in our shareholder portal, we will process your e-mail address and, if necessary, your telephone number on the basis of your consent (Art. 6 para. 1 sentence 1 lit. a) GDPR).

Communication and analysis - In addition, we process your contact information in order to communicate with you as a shareholder as well as for analyses and statistical evaluations in order to determine the shareholder structure. Depending on the circumstances, the legal basis is Article 6 (1) sentence 1 lit.c) GDPR and/or the safeguarding of legitimate interests pursuant to Article 6 (1) sentence 1 lit. f) GDPR.

Other purposes - Finally, we process your personal data to fulfil other legal obligations, such as regulatory requirements, stock corporation, commercial and tax retention obligations (for example, in order to verifiably record the proof of authorization of appointed proxy representatives) based on the legal basis according to Art. 6 para. 1 sentence 1 lit.c) GDPR).

Use of cookies

In our shareholder portal, we also use cookies to ensure the functionality of the website. Cookies are small text files that store information about the usage behavior when visiting a website and are stored on the user's computer in order to be available for later calls to this website. Our purely technically necessary cookies enable navigation in our shareholder portal. These cookies also ensure that your session is secure. When you close your browser, this data is in general automatically deleted. The legal basis for data processing by cookies and web server log files is Art. 6 para. 1 p. 1 lit. f) GDPR.

For the management of the share register as well as for carrying out the shareholder meetings, we sometimes use external service providers (e.g. legal advisors, IT service providers, general meeting service providers) who have access to your personal data within the scope of the tasks assigned to them. These service providers are carefully selected, meet high data protection and data security standards and are obliged to maintain strict secrecy.

Our shareholder portal is operated by Computershare Deutschland GmbH & Co. KG as our data processor in accordance with our instructions (Art. 28 GDPR). Your personal data will not be used by Computershare for their own purposes.

In addition, we may be obliged to transfer your personal data to other recipients, such as authorities to comply with legal notification obligations.

If you take part in the annual shareholder meeting, other shareholders of Vantage Towers and their representatives can view the data collected about you in the list of participants in accordance with Section 129 (4) AktG. Notifications of voting rights, requests, motions or the like to be published by Vantage Towers are accessible to the public or at least to other shareholders and representatives, depending on the medium chosen by Vantage Towers.

THIRD COUNTRY TRANSFER

We do not intend to transmit your personal data to a third country outside the European Economic Area (EEA) or to an international organisation. This will only be done in exceptional cases and only if an adequate level of data protection has been confirmed to the third country by the EU Commission or if other appropriate data protection guarantees are in place (e.g. binding internal company data protection regulations or agreement to the EU Commission's standard contractual clauses). We therefore protect your data regardless of whether it is located inside or outside the European Economic Area and whether it is processed by ourselves or by service providers on our behalf.

STORAGE PERIOD

Personal data of shareholders and their authorised representatives will be deleted or anonymized, if they are no longer necessary for the purposes described above, if no other statutory retention obligations apply and if the date is no longer needed to assert or defend against any legal claims.

Share register - The statutory retention period for data stored in the share register is ten years after the sale of your shares.

Annual shareholder meeting - The retention period for personal data processed in connection with the annual shareholder meeting is regularly up to three years.

Shareholder Portal - The data for registration in the shareholder portal and the web storage data will be deleted immediately after the end of the session. The server log files data are kept for 32 days and deleted thereafter.

RIGHTS OF DATA SUBJECTS

Under the statutory requirements, you have the right to obtain information from us on your personal data we process (Article 15 GDPR), the right to claim rectification (Article 16 GDPR) or deletion (Article 17 GDPR) of your personal data or to restrict processing (Article 18 GDPR). In addition, you may consult with the competent supervisory authority any time.

Right to object (Article 21 GDPR): If we process your data to pursue legitimate interests (point (f) of Article 6 (1) sentence 1 GDPR), you may object to such processing, if based on your individual situation valid reasons arise to prevent such processing. Please submit your objection to the aforementioned contact address.

Right to withdraw consent (Article 7 (3) GDPR): If we process your personal data based on your consent (point (a) of Article 6 (1) sentence 1 GDPR), you can withdraw your consent at any time for the future. To withdraw your consent please contact us at the aforementioned contact address.

Right to data portability (Article 20 GDPR): If we process your personal data based on your consent (point (a) of Article 6 (1) sentence 1 GDPR), you have the right to receive your personal data in a structured, commonly used and machine-readable format.
