

**Vantage Towers AG Privacy Notice for Shareholders (in accordance with Art. 13 and 14 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 General Meeting (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

**DATA PROTECTION OFFICER**

Vantage Towers AG  
Prinzenallee 11-13  
40549 Düsseldorf  
E-Mail: [privacy@vantagetowers.com](mailto:privacy@vantagetowers.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, this will also be reported to us via Clearstream Banking AG.

**General Meeting** - In relation with the General 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 requested by a shareholder, we process the e-mail address provided by the respective shareholder in the shareholder portal in order to send invitations to general meetings and other relevant information to the e-mail address.

**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:

- Data for registration in the shareholder portal: access code;
- Web Storage Data: authentication token, session data, login time stamp;
- 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 General Meeting.

We receive personal data directly from you as the affected shareholder or representative. Clearstream Banking AG may provide us with personal data to update the data we receive from you. If you are a registered shareholder, we have taken your contact details from the share register.

**For what purpose do we process your personal data?**

**Management of the share register** - Section 67 of the German Stock Corporation Act (*AktG*) requires the stock corporation to maintain a share register. The legal basis for the processing of shareholders' personal data is Art. 6 (1) sentence 1 lit. c) GDPR.

**Carrying out the General Meeting** - We process your personal data for the purpose of organizing and conducting general meetings. The legal basis for this is Art. 6 (1) sentence 1 lit. c) GDPR as well as further our legitimate interest in the conducting the general meeting, Art. 6 (1) sentence 1 lit. f) GDPR. When we answer questions, it may happen that your name is mentioned as the questioner if there is a legal obligation to do so or if otherwise the legitimate interest of the company so justify (Art. 6 (1) lit. c) or 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. The legal basis is the safeguarding of our legitimate interests in the ensuring of the shareholder portal according to Art. 6 (1) sentence 1 lit. f) GDPR. If you have given your consent in our shareholder portal to receive the invitation to the General Meeting electronically, we will process your e-mail address and, if applicable, also your telephone number on the basis of the consent you have given (Art. 6 (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 and for analyses and statistical evaluations to determine the shareholder structure. The legal basis is, depending on the purpose of processing, Art. 6 (1) sentence 1 lit. c) GDPR and/or the protection of legitimate interests to understand our shareholder structure according to Art. 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 Art. 6 (1) sentence 1 lit. c) GDPR).

### **Use of cookies**

In our shareholder portal, we 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 mandatory cookies and web server log files is Art. 6 (1) sentence 1 lit. f) GDPR.

### **RECIPIENT OF YOUR DATA**

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 bound to strict confidentiality. Should you require further information on the service providers we use, please contact our Data Protection Officer, [privacy@vantagetowers.com](mailto:privacy@vantagetowers.com).

Our shareholder portal is operated on our behalf by Computershare Deutschland GmbH & Co. KG ("Computershare") in accordance with our instructions within the framework of order processing pursuant to Art. 28 GDPR. Computershare does not use your personal data for its 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 General 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. Voting rights notifications, requests, motions

or similar, which are to be published by us, are accessible to the public or at least to the other shareholders and shareholder representatives with the data to be provided in the process, depending on the medium we have chosen.

### **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 organization. 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 data 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.

**General Meeting** - The retention period for personal data processed in connection with the General 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 40 days and deleted thereafter. The other master data will be deleted from the shareholder portal within three years of the shareholder status ending or upon request for deletion.

### **RIGHTS OF DATA SUBJECTS**

Subject to the legal requirements, you have the right to contact our Data Protection Officer at any time and free of charge with an informal message or to contact us directly in order to exercise your rights under the GDPR. You have the right:

- in accordance with Art. 15 GDPR, to request information about your personal data processed by us. In particular, you may request information about the purposes of the processing, the categories of personal data, the categories of recipients to whom your data has been or will be disclosed, and the existence of automated decision-making including profiling.
- in accordance with Art. 16 GDPR, to request the immediate correction of incorrect or incomplete personal data stored by us.
- in accordance with Art. 17 GDPR, to request the deletion of your personal data stored by us, unless the processing is necessary in particular to fulfil a legal obligation or to assert, exercise or defend legal claims.
- in accordance with Art. 18 GDPR, to demand the restriction of the processing of your personal data if you dispute the accuracy of the data, if the processing is unlawful and you refuse to delete it, if we no longer need the personal data but you need it to assert legal claims, or if you have objected to the processing in accordance with Art. 21 (1) GDPR.
- in accordance with Art. 20 GDPR, to receive the personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller.

**Right of objection (Art. 21 GDPR):** If we process your data to pursue legitimate interests (Art. 6 (1) sentence 1 lit. f) DSGVO), you may object to this processing if reasons arise from your particular situation that conflict with this data processing. Please send your objection to the contact details above.

**Right of revocation (Art. 7 (3) GDPR):** If we process your personal data on the basis of consent given by you (Art. 6 (1) sentence 1 lit. a) DSGVO), you may revoke this consent at any time for the future. Please send your revocation to the contact details given above.

Pursuant to Art. 77 GDPR, you have the right to complain to a supervisory authority. The supervisory authority responsible for us is: The **State Commissioner for Data Protection and Freedom of Information for North Rhine-Westphalia**, P.O. Box 20 04 44, 40102 Düsseldorf.

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