

Vantage Towers AG Germany Privacy Notice in accordance with Art. 13 und 14 GDPR

Date: 01.01.2026

This privacy notice applies once you conclude a property related agreement with Vantage Towers Germany (such as for example: lease or sub-lease agreements, right of use agreements, buy out agreements, access agreements etc., hereafter called “**the Contract**”). You can access this privacy notice any time on our website here: <http://www.vantagetowers.com/en/our-european-markets/germany>. This privacy notice gets updated from time to time, so we would encourage you to check it regularly on our website.

1. Data Controller – who is responsible for data processing

Vantage Towers AG

Adress: Prinzenallee 11-13, 40549 Düsseldorf

E-Mail: landlords.germany@vantagetowers.com

2. Contact our Group Data Protection Officer

Vantage Towers AG with the addition “To the Data Protection Officer”

Address: Prinzenallee 11-13, 40549 Düsseldorf, Germany

E-Mail: privacy@vantagetowers.com

3. Personal Data which we process

We process the following personal data:

- Your contact and personal information, such as first name, surname and/or family name, address, phone number, mobile phone number, e-mail address, VAT number;
- Payment and bank information details as necessary to process payment and prevent fraud;
- Any other information necessary for the performance of the Contract or/and that you have provided to us voluntarily, such as any applications, property deeds, drawings, bank and other certificates, property tax certificate, deeds of inheritance;
- Information that is publicly available or accessible from credit agencies or other information database, in particular information from sanctions lists or Land registry Offices;
- Data related to your participation in surveys, such as information about the surveys you have received/participated in, such as details of surveys sent to you or information about surveys, your responses to the surveys or as part of the surveys;
- Your photographs, digital images and sound, provided that we have your consent and which are collected and processed by technical means for the purpose of identifying and authenticating you;

- Your account data (e.g. username or user ID, email address, name), authentication data (e.g. password, security questions/answers), content of requests/interactions with our staff, your browser data, IP address, language settings, device information, your consent to the use of cookies, your marketing preferences (opt-in/opt-out), call recording when you register, use and access our electronic tools/platforms for the management and monitoring of our landlords' portfolio.

4. Purpose and legal basis for processing your Personal Data

We process your personal data for the following purposes:

To fulfill the Contract to which you are party:

1. To communicate with you and other third parties who are our agents or vicarious agents and act on our behalf in relation to the Contract (for example to renew or amend the Contract, to inform you about the termination or about an offer, to negotiate the contractual clauses etc.);
2. To plan, execute and administer our Contract between Vantage Towers AG und you (for example for the purpose of internal accounting, invoicing, undertaking maintenance or repairs etc.);
3. To comply with legal archiving obligations (e.g. tax and commercial retention obligations) and, if applicable, resolve any disputes (judicially or extrajudicially), pursue and file for any claims or defend any claims made against us;
4. To ask you to participate to our landlords' satisfaction surveys regarding our collaboration for service improvement purposes. These surveys are in the form of a questionnaire and can be sent to you through companies applications, via email, or they could be conducted through outgoing telephone calls. They can also be carried out by an external partner. In case you choose to participate in a survey, we will analyze your answers and may contact you;
5. To promote and communicate with the general public, initiatives carried out by us or a national or foreign company of the economic group in which we are integrated involving the owners of real estate with whom contractual relations are already established or are intended to be established (brand marketing);
6. To comply with the current regulatory framework for corporate governance. In the context of our compliance with the current regulatory framework, we are obliged to have in our organizational structure an Internal Audit unit and a Regulatory Compliance unit, which within their responsibilities can process your personal data;
7. To select you for participating in our satisfaction surveys and in contract-related initiatives and contact you. We process a limited range of your personal data and specifically contract data (personal data, payment data, information related to the Contract that you have provided to us);
8. To ensure commercial credit, reliability, security of transactions and the exercise of our rights of economic freedom and freedom of information of undertakings, which provide credit, by enabling us to assess your creditworthiness and mitigate any risks when we sign an agreement or conclude a transaction with you and

9. To provide you a seamless and continuous service and support with your queries and requests in the context of your contractual relationship or impending one, with us over our landlords' platform, tools and systems.

The processing of your personal data, for the purposes No. 1-4, is necessary to fulfill the Contract to achieve the objective established in this Clause, to which you are party including its execution. The legal basis for processing your personal data for the purposes No. 1-4, is Art. 6 (1) b) and f) GDPR.

The processing of your personal data carried out when you take part in a survey for the purposes set out in section 4, points 5 and 8, is based on our legitimate interests in accordance with Article 6(1)(f) of the GDPR.

The specific types of processing based on our legitimate interests are carried out after careful weighing of our legitimate interest in relation to the need to protect your personal data and are limited to the absolutely expected and necessary processing, which is compatible with our relation.

The processing of your personal data for the purposes set out in Section 4(6) is based on your consent in accordance with Article 6(1)(a) of the GDPR. Under no circumstances will we process your photographs, digital image files or audio recordings unless we have requested your consent for any of the aforementioned data processing activities and have received your declaration of consent. The processing of your personal data for the purpose No. 7 is based on our legal obligation, Art. 6(1) c).

5. Storage period for Personal Data

- Your personal data will be stored for the duration of the contractual relationship and thereafter until the expiry of the applicable standard limitation period in accordance with Section 195 of the German Civil Code (BGB) (three years). Your personal data will then be deleted, unless we are obliged to retain and store it for a longer period pursuant to Article 6(1) sentence 1(c) of the GDPR due to tax and commercial law retention and documentation obligations (for example, under the German Commercial Code (HGB), the German Criminal Code (StGB) or the German Fiscal Code (AO)), or you have consented to further storage in accordance with Article 6(1) sentence 1(a) of the GDPR.
- Your photos, digital image files and audio recordings will be stored for as long as the marketing initiatives are ongoing. The maximum storage period is one year from the date of publication, unless you withdraw your consent. Should you withdraw your consent, we will cease processing your photos, digital image files and audio recordings immediately. The withdrawal of your consent only has legal effect for the future and does not affect the lawfulness of the processing of your photos, digital image files and audio recordings prior to the declaration of withdrawal.
- Survey data is retained for one (1) year from the date of your participation in it.

Your browser related data when you access our platform, tools and systems are processed for the duration of the session and thereafter, deleted.

6. Rights of those affected

According to Articles 12 et seq. of the GDPR, you have the following rights as a data subject:

- request information as to your Personal Data we process (Art. 15 GDPR);
- If inaccurate or incomplete personal data has been processed, you have the right to request, without undue delay, that we rectify or complete your personal data held by us (Article 16 of the GDPR);
- subject to fulfill the legal requirements, request erasure or restriction or object to the processing of your Personal Data as well as invoke the right to data portability (Art. 17, 18, 20 und 21 GDPR).
- If we process your Personal Data based **on your consent**, you have the right to withdraw this consent at any time with effect for the future. The withdrawal of consent does not affect the lawfulness of processing based on consent before your withdrawal.

You can withdraw your consent either via post, sending a letter under the title **“Consent withdrawal”** with the addition: **“To the Data Controller”** to the address: Vantage Towers AG, Prinzenallee 11-13, 40549 Düsseldorf or via email per E-Mail using the subject line **“Withdrawal of consent”** and sending it to the address privacy@vantagetowers.com, stating your name and how and to which address you would like to receive the reply.

If Vantage Towers AG processes your Personal Data for the purposes of our legitimate interests (Art. 6 par. 1 f) GDPR), you have the right to object to processing. If you claim your right to object, we will no longer process your personal Data, unless Vantage Towers AG demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defense of legal claims.

If you claim any of your data subject rights, Vantage Towers will analyze whether the legal preconditions are met. Please address any request to our Group Data Protection Officer either via post to the address: Prinzenallee 11-13, 40549 Düsseldorf, Germany with the addition **“To the Data Protection Officer”** and with the indication: **“Exercise of GDPR Rights”** or via email to the address privacy@vantagetowers.com with the addition: **“To the Data Protection Officer”** and the indication: **“Exercise of GDPR Rights”**, stating your name and how and to which address you would like to receive the reply.

We will respond to your requests free of charge within one (1) month of receiving the request. In exceptional cases this deadline may be extended for two (2) months if required due to the complexity of your request. In any case, we will inform you about this extension and the reason for the delay.

If we consider that your request is manifestly unfounded or excessive, we reserve the right to request a reasonable fee for its satisfaction, taking into account the administrative costs for its execution or even to refuse to follow up on your request.

In case you think that we have not sufficiently satisfied your request and the protection of your personal data is affected in any way, you can submit a complaint to Landesbeauftragten für Datenschutz und Informationsfreiheit Nordrhein-Westfalen, <https://www.ldi.nrw.de/>, Adress: Postfach 20 04 44, 40102 Düsseldorf, poststelle@ldi.nrw.de (the competent data protection supervisory authority pursuant to Article 77 of the GDPR).

7. Recipients or categories of recipients

We may share your Personal Data with third parties, if necessary, for the performance of the Contract, for the performance of any satisfaction surveys, for the performance of selected contract related initiatives, or in case of processing of your photos, digital images and sound, if necessary for the public promotion and communication of Vantage Towers or a national or foreign company of the economic group in which Vantage Towers is integrated for initiatives regarding the owners of real estate (Clause 4, par. 6), being:

- Vantage Towers Group companies;
- Vodafone Group companies;
- Third parties outside the above Groups who are involved as service providers/Data processors;
- Government bodies, regulatory organisations, courts or other public authorities if we have to, or are authorized to by law and
- In conjunction with any corporate transformation, merger, sale or acquisition of a company in the Vantage Towers Group or any business unit transfer.

Eventually we may transmit Personal Data to countries outside the European Economic Area (third countries), which may not provide the same data protection level. Unless there is an adequacy decision – pursuant to Art. 45 GDPR – by which the European Commission determines an adequate level of protection in the respective third country, we have taken measures to ensure adequate and appropriate safeguards for the protection of your Personal Data. These include so-called EU standard contractual clauses that have been concluded with recipients of the Personal Data and that provide for appropriate safeguards (Art. 46 GDPR). If a transfer to companies belonging to the Group is necessary for the execution of the Contract and/or for the execution of the promotional and communication initiatives (brand marketing), this is secured by corresponding reciprocal agreements.

Specifically, this involves the transfer of your data to the following service providers or categories of service providers of Vantage Towers AG, categorised according to the respective service provider's area of responsibility: :

- **Acquisition:** acquisition service providers for the purpose of negotiation contracts;
- **Planning:** planning service providers for the purpose of establishing network plans or other construction plans;
- **Construction:** construction service providers such as civil engineering, steel construction, electrical engineering, air conditioning, building technology, construction management;
- **Operation:** monitoring service providers;
- **Maintenance:** maintenance service providers;
- **Property management:** property management service providers;
- **Energy:** energy service providers;

- **IT:** IT service providers; and
- **Marketing:** brand marketing agencies, communications campaign agencies, media strategic planning service providers, customer satisfaction survey service providers.

Our processors laid out above are entitled to use sub-contractors, which may be granted access to your personal Data as necessary for undertaking the services.

8. What are the steps we take to protect your data

We apply the appropriate technical and organizational measures in our business processes and systems and platforms used to collect, process or use the data. The same obligations are ensured that they are fulfilled by our service providers over the data processing agreements that we have entered into with them (Art.28 GDPR). We remain the Controller of the personal data being processed.
