

# Privacy Notice for Shareholders of EQS Group AG

Valid from May 25<sup>th</sup>, 2018  
(Last updated: May 24<sup>th</sup>, 2018)

As of 25 May 2018, new regulations on data protection will apply with the General Data Protection Regulation (GDPR). EQS Group AG (hereinafter referred to as "we" or "us") attaches great importance to compliance with data protection regulations. With the following information we would like to inform you as our shareholder about the processing of your personal data and the rights to which you are entitled under data protection law.

## 1. Categories of personal data and sources the personal data originate

Our shares are registered shares for which § 67 German Stock Corporation Act (AktG) stipulates that they must be entered in the company's share register, stating the name, date of birth and address of the shareholder as well as the number of shares or the share number. These details are obligatory for you as a shareholder, otherwise you cannot be entered in the share register and you cannot exercise your rights as a shareholder.

Usually the credit institutions involved in the purchase, disposal or safekeeping of your EQS Group AG registered shares pass on to us the data relevant for maintaining the share register (in addition to the above-mentioned data, in particular also the nationality). This is done via Clearstream Banking AG, which as central securities depository is responsible for the technical settlement of securities transactions and the custody of shares for credit institutions.

Further personal data, such as your e-mail address or data on your participation in the Annual General Meeting, will only be processed within the legally permissible framework.

## 2. Purpose and legal basis for the processing of personal data

We process your personal data in accordance with the scope of the GDPR, the Federal Data Protection Act (BDSG), the AktG and all other relevant legal provisions.

Data processing based on legal requirements (Art. 6 Par. 1 c GDPR)

We process your personal data for the purposes provided for in the AktG, in particular, to maintain the share register, to communicate with you as our shareholder and to handle our Annual General Meetings. In addition, we may also process your personal data to meet further legal obligations, such as regulatory requirements or retention obligations under stock corporation law, commercial law and tax law. For example, if the voting right is to be exercised by a proxy, proof of the authorization must be verifiably recorded for three years.

Data processing for legitimate interests (Art. 6 para. 1 f GDPR)

We process your data in a permissible manner to protect our legitimate interests. This is the case if, for example, in the event of capital increases we are obliged to exempt individual shareholders from information on subscription offers due to their nationality or place of residence to comply with securities regulations of the countries concerned. In addition, your data can be used to compile statistics, e.g. for the presentation of shareholder performance.

We will inform you in advance within the framework of the statutory provisions if we wish to process your data for a purpose other than those mentioned here.

### 3. Transfer of personal data

To maintain and administer the share register and to handle the Annual General Meeting (e.g. for printing and sending shareholder notifications or for holding the Annual General Meeting), we make use of external service providers who have access to your personal data within the scope of the tasks assigned to them. Our service provider for maintaining the share register is Computershare Deutschland GmbH & Co. KG.

In addition, we may transfer your personal data to other recipients insofar as this is required for the fulfilment of legal obligations, e.g. to authorities for the fulfilment of legal notification obligations. If you participate in the Annual General Meeting, other shareholders of EQS Group AG may view the personal data recorded in the list of participants pursuant to section 129 AktG.

### 4. Duration of storage or erasure of personal data

We erase or anonymize your personal data as soon as they are no longer required for the purposes mentioned and there are no other legal storage obligations or justification reasons for the storage. These include storage obligations under the AktG, the German Commercial Code (HGB) or the German Fiscal Code (AO). The retention period for data recorded relating to the Annual General Meeting is usually 3 years. After the disposal of your shares, we must regularly keep the data stored in the share register for another 10 years. Furthermore, we only store your personal data if this is necessary regarding possible claims against us. The statutory limitation period is usually 3 years, in some cases up to 30 years.

### 5. Your rights

If you have any questions or complaints regarding data protection, please do not hesitate to contact us. You will find our contact details under point F of this Privacy Notice. This includes the right of access to your personal data under Article 15 GDPR, the right to rectification of inaccurate personal data under Article 16 GDPR, the right to erasure of your data under Article 17 GDPR, the right to restriction of processing under Article 18 GDPR and the right to data portability under Article 20 GDPR. You can also contact the responsible supervisory authority.

Right to object:

If we process your data for legitimate interests, you may object to such processing if your particular situation gives rise to reasons which are opposed to such data processing. Please address your objection to the address given in point F of this Privacy Notice.

### 6. Data Controller and Data Protection Officer

The Controller for processing your personal data is:

EQS Group AG, Karlstraße 47, 80333 München, [info@eqs.com](mailto:info@eqs.com), +4989210298-0

You can contact our data protection officer at:

EQS Group AG, Oliver Kunert, Karlstraße 47, 80333 München, [datenschutz@eqs.com](mailto:datenschutz@eqs.com), +4989210298-50

*Status: May 24<sup>th</sup>, 2018*