

# Information for Shareholders, Proxies and Guests of Deutsche Börse AG on Data Protection

We are writing to inform you about the processing of your personal data by Deutsche Börse AG, Eschborn, Germany ('the Company') and the rights granted to you according to Data Protection law.

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

Deutsche Börse AG  
Mergenthalerallee 61  
65760 Eschborn

The Data Protection Officer of Deutsche Börse AG can be reached by mail at the below address.

Additionally, ADEUS Aktienregister-Service-GmbH, ADEUS Aktienregister-Service-GmbH, Königinstr. 28, 80802 Munich, Germany ('Adeus') has been commissioned with the management of the share register of Deutsche Börse AG. ADEUS is a subsidiary of Allianz SE.

## **For what purposes and on what legal basis is your personal data processed and by whom do we receive your personal data?**

We process your personal data in compliance with the EU General Data Protection Regulation (GDPR), the German Federal Data Protection Act "Bundesdatenschutzgesetz" (BDSG), the German Stock Corporation Act "Aktiengesetz" (AktG) and all other relevant legal provisions.

Deutsche Börse AG shares are classed as registered shares. In the case of registered shares, § 67 AktG requires that information is entered in the share register of the Company, stating the name, date of birth and postal address as well as an electronic address of the shareholder, as well as the number of shares or the share number and in the case of par-value shares the amount. The shareholder is generally obliged to provide the Company with this information. The intermediaries involved in the acquisition or custody of your Deutsche Börse AG registered shares regularly forward to us the information relevant to the management of the share register (for example, nationality and, if applicable, the professional branch designation). This process is completed via Clearstream Banking AG, Mergenthalerallee 61, 65760 Eschborn, Germany, a subsidiary of Deutsche Börse AG, which, as the central securities depository, performs the technical processing of securities transactions and the custody of shares for the institutions. If you sell your shares, the institution of the new acquirer will inform us.

We use your personal data for the purposes set out in the German Stock Corporation Act. These purposes are, in particular, the management of the share register, the communication with you as a shareholder and any resolution at the shareholders' meeting. When you register for the Annual General Meeting or authorize

a proxy, we will collect personal data on you and/or your authorized proxy. We do so to enable shareholders to exercise their rights at the Annual General Meeting. We also process your personal data when you attend the Annual General Meeting as a guest, in order to be able to submit the admission ticket to you and to grant you access.

Insofar as the Annual General Meeting takes place in the form of a virtual Annual General Meeting within the meaning of Section 1 (2) sentence 1, (6) of the German Act on Measures Under the Law of Companies, Corporate Societies, Association, Foundations and Commonhold Property to Combat the Effects of the COVID-19 Pandemic (COVID-19 Act) (extended and amended by Article 11 of the Act dated 22 December 2020, Federal Law Gazette (BGBl.) I p. 3332), the processing of your personal data shall be carried out for the proper preparation and conduct of the Annual General Meeting, for the exercise of voting rights, and for the submission and answering of questions and follow-up questions, if any, with your name. As part of the virtual Annual General Meeting, you also have the opportunity to submit comments either in writing or as a video message via the shareholder portal. Your video messages and written comments will be published on our website at [www.deutsche-boerse.com/hv](http://www.deutsche-boerse.com/hv). Video messages can be shown as part of the Annual General Meeting. The video messages and written comments will be deleted from our website after the virtual Annual General Meeting has been held. The legal basis for processing in this case is your consent pursuant to Art. 6 (1) (a) and Art. 7 GDPR.

In addition, we use your data only for purposes that are compatible with the aforementioned (in particular for the production of statistics, e.g. for the presentation of the shareholder development, number of transactions, overview of the largest shareholders).

The legal basis for processing your personal data is the Stock Corporation Act (in particular § 67e AktG) in conjunction with Article 6 (1) (c) and (4) GDPR. In addition, we process personal data to protect the following legitimate interests (Article 6 (1) (f) of the GDPR): Organization and orderly execution of the Annual General Meeting.

In addition, we may also process your personal data to fulfil other legal obligations, for example, regulatory requirements, stock-, commercial- and tax legislation retention requirements. In order to comply with regulations, for example, when authorising the proxies nominated by the Company for the shareholders' meetings, we must verify and record such data that serves as proof of proxy. We must also keep it access protected for three years (section 13.4 (3) sentence 5 AktG). The legal basis for the processing in this case is under the respective regulations in conjunction with Article 6 (1) (c) GDPR.

If we intend to process your personal data for a purpose not mentioned above, we will inform you in advance within the scope of the legal provisions.

### **Which categories of recipients do we share your personal data with?**

#### **External service providers:**

For the administration and technical management of the share register (share register service company, IT service provider) as well as the handling of shareholders' meeting (SM service providers), we use a number of external service providers. External service providers who process personal data on our behalf are contractually bound as Data Processors in accordance with Article 28(3) GDPR.

**Other recipients:**

In addition, we may transfer your personal information to other recipients, such as public authorities, to comply with our legal reporting obligations (for example, if you exceed statutory voting thresholds).

**How long do we save your personal data?**

We will delete your personal data as soon as it is no longer necessary for the above purposes. We may retain personal data for sufficient time to enable us to defend us against claims to be made against the Company (legal limitation period of three up to thirty years). In addition, we store your personal data as far as we are legally obliged to do so. Corresponding proof and retention obligations arise, among other things, from the German Commercial Code “Handelsgesetzbuch”, Tax Code “Abgabenordnung” and Money Laundering Act “Geldwäschegesetz”. These regulations require storage periods of up to ten years.

**How do we transfer personal data to non-European countries?**

Should we transfer personal data to service providers outside the European Economic Area (EEA), the transfer will only take place if the location has been confirmed by the EU Commission to have an adequate level of data protection or other appropriate data protection safeguards (e.g. binding internal data protection regulations or agreement to standard (data protection) contractual clauses of the European Commission). You can request detailed information on this subject as well as the level of data protection at our service providers in third countries from the contact information detailed above.

**What rights do you have as a data subject?**

You may request information about the data stored about you from the contact information detailed above. Additionally, under certain circumstances, you may request a restriction of processing and the deletion of your data. You also have the right (in certain circumstances) to require your Personal Data to be transferred to you or a third party. In addition, you have a right to object to a statistical evaluation of your data. To exercise these rights, please contact us under the below mentioned address.

**How to make a complaint about the handling of personal data?**

You have the option of contacting the Data Protection Officer or a data protection supervisory authority.

Data Protection Officer of the Deutsche Börse AG:

**Deutsche Börse AG**  
Data Protection  
Mergenthalerallee 61  
65760 Eschborn  
Germany

dataprotection@deutsche-boerse.com

The data protection supervisory authority responsible for the Company is as follows:

**Der Hessische Datenschutzbeauftragte**

Gustav-Stresemann-Ring 1  
65189 Wiesbaden  
Postfach 31 63  
65021 Wiesbaden  
[www.datenschutz.hessen.de](http://www.datenschutz.hessen.de)

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