

Information on data protection for Scout24 SE shareholders

Information on data protection for Scout24 SE shareholders and their representatives

The following pages provide information on how the personal data of shareholders and persons recorded in the shareholders' register (shareholders) and their legal representatives (**proxies** or **shareholder representatives**) is processed by Scout24 SE. The information below refers exclusively to data processing in connection with your position as shareholder or shareholder representative or as a result of visiting this website and using the password protected online service provided here (together the **shareholder portal**).

1. Who is responsible for data processing?

Scout24 SE processes the personal data of shareholders and their representatives in its role as data controller within the meaning of Art. 4 (7) of the General Data Protection Regulation (**GDPR**).

Scout24 SE's contact details are:

Scout24 SE, Bothestr. 13 - 15, 81675 Munich, Germany
Email: info@scout24.com – Telephone: +49 89 262024920

You can contact the **data protection officer** for Scout24 SE by post at the following address: Scout24 SE, - The Data Protection Officer -, Bothestr. 13 - 15, 81675 Munich; and by email at: contact-ds@scout24.com

2. For what purposes and on what legal basis is your data processed?

We process the personal data of shareholders and their representatives for the following purposes and on the following legal basis.

To fulfill our legal obligations (Art. 6 (1c) GDPR in conjunction with the respective legal obligation)

We are subject to a variety of legal obligations associated with the general meeting and must process personal data to fulfill them. Pursuant to Section 67e (1) of the German Stock Corporation Act (**AktG**), we are authorized to process shareholders' personal data for the purposes of identification, communicating with shareholders, companies and intermediaries, exercising the rights of shareholders, maintaining the shareholders' register and cooperating with shareholders in other ways. In addition, Section 67 (6) sentence 3 AktG permits us to process the data from the shareholders' register to fulfill the tasks incumbent on us in our relationship with our shareholders. On this basis, we process your personal data for the following purposes:

- maintaining the shareholders' register (Section 67 AktG);
- issuing notification that the general meeting is to be convened (Section 125 AktG);
- using the shareholder portal (e.g. for identity checks on login, following the general meeting by audiovisual means, shareholder registration for the general meeting, submitting postal/online votes, granting proxy authorizations and issuing instructions, submitting questions, filing objections);
- executing, preparing for and following up on the general meeting (in particular shareholder registration for the general meeting, ensuring that the virtual general meeting is conducted efficiently, analyzing votes and any objections, and for organizational planning), where necessary in conjunction with other requirements of stock corporation law pursuant to Sections 118 et seq. AktG and duties pursuant to Section 1 of the German Act on Measures in Corporate, Cooperative, Association, Foundation and Home Ownership Law to Combat the Effects of the COVID-19 Pandemic (*Gesetz über Maßnahmen im Gesellschafts-, Genossenschafts-, Vereins-, Stiftungs- und Wohnungseigentumsrecht zur Bekämpfung der Auswirkungen der COVID-19-Pandemie*);
- enabling the shareholders to exercise the rights granted to them in the context of the general meeting (e.g. submitting postal/online votes, granting authorizations and issuing instructions, requesting additions to the agenda, counter-motions and nominations), including the provision of company-appointed proxies;
- producing a list of shareholders appearing in person or being represented by a proxy and of the proxies representing them, and making this list available for inspection, in line with Section 129 (1) sentence 2 and (4) AktG;
- issuing confirmations that electronic votes have been received and of vote counts;

- providing information about the company, including the electronic or postal transmission of relevant information subject to securities regulations, and maintaining contact with our shareholders (investor relations).

We are also subject to other obligations under stock corporation law, commercial law, and tax law that require the processing of personal data of shareholders and their representatives (such as reporting, disclosure, and retention obligations).

In the context of prevailing legitimate interests (Art. 6 (1f) GDPR)

We process the personal data of shareholders and their representatives to the extent necessary for the purposes of our legitimate interests or those of a third party, insofar as the fundamental rights of shareholders and their representatives relating to the protection of their personal data do not prevail over such interests. We have a prevailing legitimate interest in the processing of personal data relating to the following purposes:

- communicating personal data to our external legal advisors, tax advisors, or auditors to review the legal provisions;
- presenting and analyzing the shareholder structure (overviews of the largest shareholders, for example) and their development, including the number of transactions; and
- ensuring compliance with non-European securities regulations.

We are legally required to contact you in advance before processing your data for any purposes not listed above.

3. Where do we obtain your personal data? What categories of personal data do we process? Is there an obligation to provide personal data?

We obtain personal data either directly from shareholders or their representatives, or indirectly from the respective custodian bank (generally via Clearstream Banking AG).

The data processed by Scout24 SE comprises the last name, first name, title and form of address, date of birth, nationality, gender, postal address, email address, and other contact details of the shareholder, and the representative where applicable, data on the shares (including where they are held), and administrative data, as well as data on the exercise of shareholder rights, including the right to vote.

Under Section 67 (1) sentence 2 AktG, Scout24 SE shareholders are required to notify us of the data to be included by law in the shareholders' register. Pursuant to Section 67 (4) sentence 1 AktG, the same applies in respect of custodian banks. Providing your personal data is mandatory in connection with the exercise of shareholder rights (except where voting rights are exercised on behalf of the person concerned).

4. Data that we collect automatically when you visit our shareholder portal

When you visit our shareholder portal on the internet, we collect data concerning access to our shareholder portal. The following data and device information are logged temporarily in the web server log files and analyzed exclusively for the purposes of error analysis and cyber attacks:

- data accessed or requested;
- date and time of retrieval;
- message on whether retrieval was successful;
- type of web browser and operating system used;
- IP address;
- session ID;
- login and account service functions;
- acknowledgement and acceptance of terms of use.

In addition, we use session cookies, which enable you to obtain a session ID for the duration of your visit to the shareholder portal. This enables us to store information about your visit (or "session") and to guarantee its continuity and security.

Cookie name	Company	Purpose	Duration
JSESSIONID	Adeus	Required in order to store information on whether the SSL is active	Session
JSESSIONID	Adeus	Required in order to reset the session	Session

The session cookie and your session ID will be deleted at the end of your visit if the session is ended properly and the browser window is closed.

The legal basis for integrating these cookies is Art. 6 (1f) GDPR. We require this information in order to make our shareholder portal available. You can accept, block, or deactivate all or some cookies on your device by selecting specific browser settings. The functionality of our shareholder portal cannot, however, be guaranteed if all cookies are blocked.

5. Which categories of recipients receive your personal data?

For the purposes set forth in sections 2 and 4 above, we use service providers that we only provide with the personal data required to perform the relevant services. All of our employees and all employees of external service providers who have access to and/or process personal data are obligated to handle this data confidentially. Captrace GmbH, Wiesbaden, has been instructed to maintain the shareholders' register for Scout24 SE, and ADEUS Aktienregister-Service-GmbH, Munich, to prepare and conduct the general meeting. Other service providers are those instructed to create and send the notification in accordance with Section 125 AktG, to record and process registration for the general meeting, to process authorizations for and the exercising of shareholders' rights, to provide technical implementation of the meeting in general and legal advice. In addition, in certain circumstances we may transfer personal data to service providers in the fields of legal advice, shareholder communication, printing, dispatch and publication media (not necessarily in connection with the general meeting).

If authorized by the shareholder or their representative in connection with the general meeting, the company-appointed proxy shall only receive from us the personal data required to cast the vote as instructed.

Requests for additions to the agenda pursuant to Section 122 (2) AktG as well as counter-motions and nominations according to Section 126 (1) and 127 AktG will be made publicly available by us as set out in the invitation to the general meeting and, where relevant, put to the vote at the general meeting. Where questions are submitted prior to the general meeting in line with Section 2 (1) sentence 1 no. 3 and sentence 2 of the German Act on Measures in Corporate, Cooperative, Association, Foundation and Home Ownership Law to Combat the Effects of the COVID-19 Pandemic, the name of the person submitting the question may be stated at the general meeting in the context of responding to the question, provided the corresponding consent was granted on the question being submitted. Such consent may be revoked at any time. Revocation may in particular be communicated by email to hv@adeus.de. Personal data of the shareholders attending or represented at the general meeting (except where voting rights are exercised on behalf of the person concerned), and of the representatives where applicable, are to be recorded in a list of attendees pursuant to Section 129 AktG, and this list is to be made accessible to the shareholders and their representatives in line with Section 129 (4) AktG.

In addition, we may be required to transmit personal data to authorities, especially the German Federal Financial Supervisory Authority (**BaFin**), on the basis of statutory notification requirements in the event that statutory voting right thresholds are exceeded, for instance. We will transmit personal data to courts, arbitration tribunals and legal advisors insofar as this is necessary to establish, exercise, or defend legal claims.

6. Transfer of personal data to countries outside the EU/EEA

The personal data of shareholders and their representatives is generally processed in countries that belong to the European Union (EU) or European Economic Area (EEA).

If persons in third countries hold shares in our company, these shareholders will also be sent information (such as invitations to general meetings). If such communications contain personal data (such as motions for general meetings in which the requestor is named), this data will also be sent to third countries. Such transmission is, however, necessary in order to ensure that all shareholders receive the same information, as we cannot exclude shareholders in third countries from our information duties. We are thus fulfilling our contractual obligations by supplying this data. The legal basis for such data transfer is Art. 49 (1b) GDPR.

7. How long will your data be stored?

We anonymize or erase your personal data as soon as it is no longer required for the aforementioned purposes and we are no longer required to store your data under a statutory burden of proof or retention obligation.

The data recorded in the shareholders' register must normally be retained for ten years after the shares are sold, for instance. If not saved in the shareholders' register, the personal data processed in connection with the general meeting will be erased or anonymized by Scout24 SE three years after the date of the general meeting at the latest, unless statutory regulations prescribe a longer retention period, for instance under the German Stock Corporation Act, Securities Trading Act (*Wertpapierhandelsgesetz*), Commercial Code (*Handelsgesetzbuch*) or the Tax Code (*Abgabenordnung*), or if prevailing legitimate interests exist in favour of the company, namely in order to establish, exercise or defend legal claims.

Otherwise, and subject to other statutory regulations, such as the German Stock Corporation Act, the Securities Trading Act, the Commercial Code or the Tax Code, your personal data will only be stored for a maximum of twelve months in accordance with Section 67e (2) AktG should Scout24 SE become aware that a shareholder is no longer a shareholder of the company.

If we believe someone has been wrongfully included in the shareholders' register, the entry can only be erased after the company has informed the data subject that it intends to erase the entry and given them reasonable time to object. If the data subject objects within the deadline, the data must not be erased.

8. What are your data protection rights?

Provided the respective statutory prerequisites have been met, you can request the following from us:

- Confirmation as to whether or not your personal data is being processed, in accordance with Art. 15 GDPR;
- Rectification of your personal data, in accordance with Art. 16 GDPR;
- Erasure of your personal data, in accordance with Art. 17 GDPR;
- Restriction of processing of your personal data, in accordance with Art. 18 GDPR, and
- Transfer of certain personal data to you or a third party named by you (right to data portability), in accordance with Art. 20 GDPR.
- You also have the right to object to the processing of your personal data, in accordance with Art. 21 GDPR (for more information, see section **Fehler! Verweisquelle konnte nicht gefunden werden.**).

You can assert these rights free of charge using the contact details provided in section 1 above. Furthermore, you have the right to lodge a complaint with a supervisory authority in accordance with Art. 77 GDPR. This includes the data protection authority responsible for us, which can be contacted as follows:

Bayerisches Landesamt für Datenschutzaufsicht
Promenade 18, 91522 Ansbach
<https://www.lida.bayern.de/de/kontakt.html>

In accordance with Section 67 (6) sentence 1 AktG, shareholders can request information from the company on the personal data relating to them that has been included in the shareholders' register.

9. Right to object, Art. 21 GDPR

You have the right to object at any time, on grounds relating to your particular situation, to the processing of your personal data on the basis of Article 6 (1f) GDPR (data processing based on an assessment of legitimate interests).

If you object, we will no longer process your personal data unless we can provide compelling legitimate grounds for such processing which override your interests, rights, and freedoms, or the purpose of data processing is to establish, exercise or defend legal claims. Such objection can be submitted without any specific formal requirements, where possible using the contact details set out in section **Fehler! Verweisquelle konnte nicht gefunden werden.** above.

Scout24 SE

Bothestraße 13-15
81675 Munich
Germany

Management Board: Tobias Hartmann (Chief Executive Officer), Dr Dirk Schmelzer, Dr Thomas Schroeter, Ralf Weitz

Chairman of the Supervisory Board: Dr Hans Holger Albrecht

Commercial register: Local Court of Munich, HRB 270215

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