

# Information on data protection for shareholders of Scout24 SE

## Information on data protection for shareholders of Scout24 SE and their representatives

With the following information, we inform you about the processing of personal data of shareholders or of persons registered in the share register (**shareholders**) and of their legal representatives (**proxies** or **shareholders' representatives**) by Scout24 SE. The following presentation is limited solely to the data processing based on the position as shareholder or shareholder representative as well as on the visit of this website and the password-protected online service offered there (together the "**Shareholder Portal**").

### 1. Who is responsible for data processing?

Scout24 SE processes personal data of shareholders and their representatives as a controller within the meaning of Art. 4 No. 7 of the General Data Protection Regulation (**GDPR**).

The contact details of Scout24 SE are:

Scout24 SE, Invalidenstr. 65, 10557 Berlin  
E-Mail: [info@scout24.com](mailto:info@scout24.com)

You can contact the **data protection officer** of Scout24 SE here:

Herting Oberbeck Datenschutz GmbH  
Hallerstr. 76  
20146 Hamburg  
<https://www.datenschutzkanzlei.de>  
Mail: [info@datenschutzkanzlei.de](mailto:info@datenschutzkanzlei.de)

### 2. For what purpose and on the basis of what legal grounds are your data processed?

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

#### **For the fulfillment of our legal obligations (Art. 6 (1c) GDPR in connection with the respective legal obligation).**

In connection with the Annual General Meeting, we are subject to various legal obligations for the fulfillment of which we must process personal data.

We process your personal data in compliance with the EU General Data Protection Regulation (GDPR), the German Federal Data Protection Act (BDSG), the German Stock Corporation Act (AktG) and all other relevant legal provisions such as EU Council Regulation No. 269/2014 of March 17, 2014.

All shares of Scout24 SE are registered shares. In the case of registered shares, Section 67 of the Stock Corporation Act (AktG) provides that these are to be entered in the Company's share register, stating the name, date of birth and postal address of the shareholders as well as the number of shares. Shareholders are obliged to provide the Company with this information. Their personal data is therefore generally collected directly from them.

We are authorized to process personal data of shareholders pursuant to Section 67e (1) AktG for the purposes of identification, communication with shareholders, the companies and intermediaries, the exercise of shareholders' rights, the maintenance of the share register and for cooperation with shareholders. In addition, Section 67 (6) sentence 3 AktG allows us to process data from the share register for our tasks in relation to our shareholders. On this basis, we process your personal data in particular for the following purposes:

- Management of the share register (Section 67 AktG),
- Notification that the general meeting is to be convened (Section 125 AktG),
- Dispatch of the convocation and access data,

- Using the shareholder portal (e.g. identity check for login, following the Annual General Meeting in audio and video, registering shareholders for the Annual General Meeting, casting postal votes, issuing powers of attorney and instructions),
- Exercising the right to information (Section 131 AktG),
- Implementation and preparation of and follow-up to the Annual General Meeting (in particular for the registration of shareholders for the Annual General Meeting, evaluation of voting behavior and any objections, organizational planning), if necessary, in conjunction with other duties under stock corporation law in accordance with Sections 118 et seq. AktG,
- Allowing shareholders to exercise their rights in connection with the Annual General Meeting (e.g. voting, casting postal votes, issuing proxies and instructions and revoking them, requesting additions to the agenda, countermotions and election proposals), including issuing proxies to the proxies appointed by the Company,
- Listing of participants and granting of inspection (Section 129 (1) sentence 2, (4) AktG),
- Issuing confirmations on the receipt of electronically cast votes and on the counting of votes,
- Provision of corporate information, including the electronic or postal transmission of information relevant under securities law, and for maintaining contact with our shareholders (investor relations),
- Proper payment of dividends in accordance with EU sanctions regulations

In addition, we are subject to other legal obligations such as regulatory requirements and obligations under stock corporation, commercial and tax law that require us to process the personal data of shareholders and their representatives (e.g. reporting, publication or retention obligations).

#### **For the protection of overriding legitimate interests Art. 6 (1f) GDPR)**

We process the personal data of shareholders and their representatives insofar as this is necessary to protect our legitimate interests or those of a third party and the interests or fundamental rights of shareholders and their representatives with regard to the protection of their personal data are not overridden. An prevailing legitimate interest on our part applies with regard to the following purposes:

- Transfer of personal data to our external legal advisors, tax advisors or auditors for verification of legal requirements,
- Representation and analysis of the shareholder structure (e.g. overviews of the largest shareholders) and their development, including the number of transactions, and
- Ensuring compliance with non-European securities law regulations.

Scout24 SE will transmit the Annual General Meeting partly on the Internet and in its entirety via the shareholder portal for shareholders who are registered there. Also in this context, personal data of shareholders may be processed.

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

### **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 receive the personal data either directly from the shareholder or his representative or indirectly from the respective custodian bank (usually forwarded via Clearstream Banking AG (Frankfurt), which as central securities depository is responsible for the technical settlement of securities transactions and the custody of shares for credit institutions).

The data processed by Scout24 SE includes the surname, first name, title, date of birth, nationality, gender, address, e-mail address and other contact data of the shareholder and, if applicable, the representatives, data on the shares (including their safekeeping), administrative data and data on the exercise of shareholder rights, including voting rights.

Pursuant to Section 67 (1) sentence 2 AktG, the shareholders of Scout24 SE are generally obliged to notify us of the information to be included in the share register pursuant to the law. The same applies in principle to the custodian institutions due to Section 67 (4) sentence 1 AktG. The exercise of shareholder rights (except in the case of the exercise of voting rights on behalf of the person to whom they relate) requires the disclosure of personal data.

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

When you visit our shareholder portal on the Internet, we collect data on access to our shareholder portal. Here, the following data and device information is logged temporarily in the Web server log files and analyzed exclusively for error analyses and cyber-attacks:

- data retrieved 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 und account service funktion
- acknowledgement and acceptance of the terms of use

In addition, we use so-called session cookies, with the help of which you receive a session ID for the duration of a visit to our shareholder portal. This allows us to store information about your visit (or "session") and ensure 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 the integration of these cookies is Art. 6 (1) lit. f GDPR. We require this information in order to make our shareholder portal available. Through special browser settings, you can accept, block or disable all or certain cookies on your device. However, the functionality of our shareholder portal with completely blocked cookies cannot be guaranteed.

#### 5. To which categories of recipients will your personal data be transferred?

For the fulfillment of the purposes mentioned in clauses 2. and 4. above, we engage service providers who receive from us only those personal data that are necessary for the performance of the commissioned service.

All our employees and all employees of external service providers who have access to and/or process personal data are obliged to treat this data confidentially and to process it exclusively in accordance with the Company's instructions. ADEUS Aktienregister-Service-GmbH, Munich, has been commissioned with the maintenance of the share register of Scout24 SE and with the preparation and execution of the Annual General Meeting. The other service providers are those for the production and dispatch of the notification pursuant to Section 125 AktG, the recording and technical processing of registrations for the Annual General Meeting, proxies and the exercise of shareholder rights, the technical processing of the meeting in other respects, and for legal advice. In addition, we may transfer personal data (also independently of the Annual General Meeting) to service providers in the areas of legal advice, shareholder communications, printing, shipping and publication media.

The proxies appointed by the Company, if authorized by the shareholder or the shareholder's representative in connection with the Annual General Meeting, receive from us only those personal data that are required for the exercise of voting rights in accordance with instructions.

In the case of requests for additions to the agenda pursuant to section 122 (2) AktG and in the case of counter motions and election proposals pursuant to sections 126 (1) and 127 AktG, these will be made publicly available by us as described in more detail in the invitation to the Annual General Meeting and, if necessary, put to the vote at the Annual General Meeting. In the event that the right to information is exercised at the Annual General Meeting, the name of the shareholder will be mentioned in the General Debate at the Annual General Meeting.

Personal data of the shareholders participating in or represented at the Annual General Meeting (except in the case of the exercise of voting rights on behalf of the person to whom they relate) and, if applicable, of the shareholders' representatives shall be recorded in a list of participants in accordance with Section 129 AktG, which shall be made available to shareholders or their representatives in accordance with Section 129 (4) AktG.

In addition, we might be obliged to transmit personal data to authorities, in particular the German Federal Financial Supervisory Authority (BaFin), e.g. due to statutory notification obligations when statutory voting rights thresholds are exceeded. As far as necessary for the assertion, exercise or defense of legal claims, we transmit personal data to courts, arbitration tribunals or legal advisors.

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

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

If persons in third countries hold shares in our company, we will also send information to these shareholders (e.g. invitations to shareholders' meetings). If these communications also contain personal data (e.g. motions to Annual General Meetings including the name of the applicant), this data will also be transmitted to third countries. However, transmission is necessary in order to inform all shareholders equally, as we may not exempt shareholders from third countries from our duty to provide information. With the transfer, we therefore fulfill our contractual obligations. The legal base for the transmission is Art. 49 (1) sentence 1 lit. b) GDPR.

## **7. How long will your data be stored?**

We anonymize or delete your personal data as soon as they are no longer required for the aforementioned purposes, and we are not obligated to continue storing them due to legal obligations to provide proof or to retain data.

The data stored in the share register must regularly be retained for ten years after a sale of shares, for example. The personal data processed in connection with the Annual General Meeting will be deleted or anonymized by Scout24 SE no later than three years after the date of the Annual General Meeting, unless a longer storage period is required by law, for example under the German Stock Corporation Act, the German Securities Trading Act (*Wertpapierhandelsgesetz*), the German Commercial Code (*Handelsgesetzbuch*) or the German Fiscal Code (*Abgabenordnung*), or because of an overriding legitimate interest of the Company, namely for the assertion, exercise or defense of legal claims.

Furthermore, subject to other statutory provisions, for example the German Stock Corporation Act, the German Securities Trading Act, the German Commercial Code and the German Fiscal Code, we will store personal data pursuant to Section 67e (2) AktG only for a maximum of twelve months if Scout24 SE becomes aware that a shareholder is no longer a shareholder of the Company.

If, in our opinion, someone has been wrongly entered in the share register as a shareholder, we may only delete the entry if we have previously notified the parties concerned of the intended deletion and set them a reasonable deadline to lodge an objection. If an interested party objects within the time limit, the deletion shall not take place.

## 8. What are your data protection rights?

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

- Information on your personal data 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 the processing of your personal data in accordance with Art. 18 GDPR, and
- Transfer of certain personal data to you or a third party identified 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 9.).

You can assert these rights against us free of charge via the contact options mentioned under point 1. In addition, 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 you can reach under the following contact details:

Berliner Beauftragte für Datenschutz und Informationsfreiheit  
Alt-Moabit 59-61  
10555 Berlin  
mailbox@datenschutz-berlin.de

Pursuant to Section 67 (6) sentence 1 AktG, shareholders may request information from the Company on the personal data entered in the share 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 personal data concerning you which is carried out on the basis of Art. 6 (1) sentence 1 f) GDPR (data processing on the basis of a balance of interests).** If you object, we will no longer process your personal data to that extent, unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing serves the assertion, exercise or defense of legal claims. Such objection can be submitted without any specific formal requirements, where possible using the contact details set out in section 1 above.

**Scout24 SE**  
Invalidenstr. 65  
10557 Berlin  
Germany

Management Board: Tobias Hartmann (Chief Executive Officer), Dr Dirk Schmelzer, Ralf Weitz  
Chairman of the Supervisory Board: Dr. Hans Holger Albrecht  
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