



# Data protection information for Deutsche Telekom AG shareholders and shareholder representatives

In the following, we wish to notify you of the processing of personal data of shareholders recorded in the shareholders' register (**shareholders**) and their legal representatives (**proxies or shareholder representatives**). It refers exclusively to data processing in connection with their position as shareholders or shareholder representatives. In particular, this data protection information does not cover data processing in connection with any customer relationship.

## 1. Who is responsible for data processing, and whom can you contact?

Deutsche Telekom AG 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**).

Deutsche Telekom AG's contact details are:

Deutsche Telekom AG  
Friedrich-Ebert-Allee 140  
53113 Bonn, Germany

Deutsche Telekom AG's Global Data Privacy Officer is Dr. Claus D. Ulmer. He can be contacted at:

Deutsche Telekom AG  
– Datenschutzbeauftragter –  
Friedrich-Ebert-Allee 140  
53113 Bonn, Germany

If you have any questions about data protection for shareholders and their representatives, please email them to: [datenschutz@telekom.de](mailto:datenschutz@telekom.de).

*In the interest of readability, no distinction has been made between male, female and non-binary.  
All personal designations apply equally to all genders.*



## 2. For what purpose 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 (1 c) GDPR in conjunction with the respective legal obligation)

We are subject to a variety of legal obligations associated with the Shareholders' Meeting and must process personal data to fulfill them. Pursuant to § 67e (1) of the German Stock Corporation Act (AktG), we are authorized to process personal data of shareholders for the purposes of identification; communicating with shareholders, companies, and intermediaries; exercising the rights of shareholders; maintaining the shareholders' register; and cooperation. In addition, § 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:

- Using **Internet Dialog** via the internet site for the Shareholders' Meeting (telekom.com/hv) (for example, for identity checks during registration, ticket orders, submitting postal/online votes, granting proxy authorizations and, if applicable, instructions)
- Maintaining the shareholders' register (§ 67 AktG)
- Execution, preparation, and follow-up of the Shareholders' Meeting (in particular: to register shareholders and their representatives for the Shareholders' Meeting, for admission control, to ensure the efficient conduct of proceedings, to analyze votes and any objections, for capacity planning, and for other organizational planning), possibly in conjunction with other requirements of stock corporation law in accordance with § 118 et seq. AktG
- Enabling the shareholders to exercise the rights granted to them in association with the Shareholders' Meeting
- Producing the list of shareholders appearing in person or being represented by a proxy and of the proxies representing them and making it accessible, in conjunction with § 129 (1) sentence 2 and (4) AktG
- Providing information about the Company, including the electronic or postal submission of information relevant according to securities regulations, and maintaining contact with our shareholders (investor relations)
- Electronic mailing of invitations to the Shareholders' Meeting, provided that the respective custodian banks of our shareholders have transmitted an e-mail address to the Deutsche Telekom share register in accordance with the statutory requirements and you have not opted for postal mailing
- Processing your request or enquiry, if you contact us in any other way



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 proxies (such as reporting, disclosure, and retention obligations).

**For performance of a contract with you or to take steps prior to entering into a contract (Art. 6 (1 b) GDPR)**

If you enter your email address in our Internet Dialog to participate in the prize draw, we will process this data to enable your participation in the prize draw and to contact you if you win.

**Legitimate interests pursued by the controller (Art. 6 (1 f) 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, where such interests are not overridden by the fundamental rights of shareholders and their representatives which require protection of personal data. We have a legitimate interest in the processing of personal data with regard to the following purposes in particular:

- During the Shareholders' Meeting, we will carry out recording activities and a public broadcast of the Shareholders' Meeting on the internet. The audience or individual persons who are present in the recording area or enter it may be filmed during the live broadcast. This also applies to verbal contributions. No recordings will be made in the audience area during voting. We will use signs at the venue to indicate the recording areas and also mark areas from which no recordings will be made. This processing serves our legitimate interest in enabling interested shareholders and the public to follow the Shareholders' Meeting over the internet in accordance with the express permission in the German Stock Corporation Act and our Articles of Incorporation.
- We use artificial intelligence to ensure that the Shareholders' Meeting is conducted efficiently and to make comprehensive use of internal knowledge bases (see also point 4 of this data protection information).
- Communication of personal data to our external legal advisors, tax advisors, or auditors to review the legal provisions
- Presentation and analysis of the shareholder structure (overviews of the largest shareholders, for example) and their development, including the number of transactions
- Ensuring compliance with non-European securities regulations

**Based on the consent of the shareholders (Art. 6 (1 a) GDPR)**

- to the sending of a newsletter or to the extent that shareholders submit personal data in connection with a request
- to Company advertising
- for the purposes of market research



- to an invitation to the Company's regional events

They may withdraw this consent at any time in the future. When obtaining their consent, we make the shareholders and their representatives aware that they have the option to withdraw this consent.

## Other processing

Different regulations shall apply if the shareholders and their representatives are online, i.e., on Deutsche Telekom's web pages or using Deutsche Telekom apps. The shareholders may find information on this in the data privacy information for the respective online offering.

We are legally required to contact you in advance before processing your data for any purpose 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 from their representatives or indirectly from the respective custodian bank (normally via Clearstream Europe AG).

The data processed by Deutsche Telekom AG 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, where applicable, the shareholder's representatives, 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.

Following § 67 (1) AktG, shareholders are required to notify us of the data to be included by law in the shareholders' register. In accordance with § 67 (4) sentence 1 AktG, this applies mutatis mutandis to 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. Use of artificial intelligence

We also use artificial intelligence to answer questions from shareholders and their representatives. This is done using internal artificial intelligence applications, which enable extensive and efficient use of specific knowledge bases of Deutsche Telekom AG. This supports compliance with the requirements of stock corporation law, such as the fulfillment of the right to request information under stock corporation law.



In order to record questions from shareholders and their representatives, we use a speech-to-text functionality, by means of which the spoken contributions are recorded directly by the artificial intelligence application and transcribed into text (**transcribed data**). In addition, Deutsche Telekom AG employees can enter questions in the application (**entered data**). Both the transcribed and the entered data (collectively, **“chat histories”**) may contain personal data of the shareholders and representatives if these are included in the spoken contributions (e.g. name of the shareholders and/or representatives and data transmitted by the shareholder or representative in the course of the spoken contribution). Chat histories are used only to provide the service described here and not for training the applications. Assuming no action for avoidance (§ 246 AktG) is brought, the chat histories are deleted after one month. Otherwise, the relevant data is stored as long as is necessary for the legal defense.

The audio recordings of the shareholders' spoken contributions are used to train the artificial intelligence application. This data is deleted after three months. If you do not wish this to be the case, you can object to this data processing. You can submit your objection to the contacts set out in section 1. Information on your right to object can also be found in section 10.

In addition, chat logs are used for the purpose of analyzing and continuously improving product quality, ensuring quality, proper and secure operation and problem solving. Chat log data does not contain any personal data of shareholders and their representatives.

No automated decision-making takes place in connection with the use of these AI applications for the purposes described here. All answers are checked before use by Deutsche Telekom AG employees.

## 5. Use of cookies and processing of log data when using our Internet Dialog

If you use our Internet Dialog, we record data associated with your visits.

Here, the following data and device information are stored temporarily in the web server log files and will only be analyzed in the case of necessary trouble-shooting or cyberattacks:

- Retrieved and requested data
- Date and time of retrieval
- Notification of whether retrieval succeeded
- Type of the web browser and operating system used
- IP address
- Session ID
- Login and account service functions
- Acknowledgment and acceptance of the terms of use



In addition, we also use session cookies, which assign you a session ID for the duration of a visit to our Internet Dialog. This enables us to store information about your visit (the “session”) and guarantee its continuity and security.

Cookies are small files that websites store on your desktop, notebook, or mobile device during your visits. This enables us to determine whether your device has already connected to our Internet Dialog in the past, for instance. Cookies may also contain personal data. You can configure your browser to notify you about the placement of cookies, to decide to accept cookies on a case-by-case basis, or block the acceptance of cookies for certain cases or in general, as well as activate automatic deletion of cookies when the browser is closed. The Internet Dialog only uses cookies that are necessary for technical functionality. Therefore, if you decline or disable cookies, you will no longer be able to use the Internet Dialog on your device.

We use the following cookies in our Internet Dialog:

Cookie name	Company	Purpose	Duration
WebSessionID	ADEUS	Support troubleshooting/investigate cyberattacks	Session
JSESSIONID	ADEUS	Identification of the user when navigating within the application	Session
HideCookieNotice	ADEUS	Controls whether the cookie banner is hidden	six months
ak_bmsc	ADEUS	This cookie is necessary for the cache function of Akamai. A cache is used by the website to optimize the response time between the visitor and the website	two hours
bm_sv	ADEUS	Akamai Bot Manager / Used to optimize security by distinguishing between humans and bots	two hours

The session cookie and your session ID are deleted at the end of your session, provided that the session is ended properly and the browser window is closed. Your browser sends this data to us automatically when you visit our Internet Dialog.

The legal basis for setting and accessing the data in essential cookies and for processing the personal data associated with these cookies is § 25 (2) No. 2 of the Telecommunications and Digital Services Data Protection Act (**TDDDG**), as they are required to provide the Internet Dialog you requested. Further processing of the information gathered from essential cookies is based on our overriding legitimate interests in accordance with Art. 6 (1 f) GDPR. We require this information to make the Internet Dialog available to you.



## 6. Which categories of recipients receive your personal data?

For the purposes set forth in sections 2, 4 and 5 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. Alongside ADEUS Aktienregister-Service-GmbH, which maintains the shareholders' register, they include, in particular, service providers used to prepare and conduct the Shareholders' Meeting (to create and send the notification in accordance with § 125 AktG, to record and process registration for the Shareholders' Meeting, authorizations and the exercise of shareholders' rights, technical implementation of the meeting in general, and to provide legal advice). In addition, in certain circumstances, we may transfer personal information to service providers in the areas of legal advice, printing, dispatch, and publication media (also independently of the Shareholders' Meeting).

The company-nominated proxies, insofar as they are authorized to do so by the shareholder or their representative in connection with the shareholders' meeting, will only receive from us the personal data necessary for exercising the voting rights in accordance with the instructions. To the extent we include the aforementioned information in the list of participants of the Shareholders' Meeting, this information can be viewed by all participants during the Shareholders' Meeting and then by any shareholder upon request for up to two years, in accordance with § 129 (4) AktG.

Should you exercise your right to request information during the Shareholders' Meeting, in accordance with § 131 (1) AktG, or otherwise make a statement, your words may be noted by all participants of the Shareholders' Meeting and potentially by any internet user worldwide who follows the audio/video transmission of the Shareholders' Meeting online.

Requests for additional agenda items pursuant to § 122 (2) AktG as well as countermotions and nominations according to § 126 (1) and § 127 AktG will be made available publicly by us as set out in the invitation to the Shareholders' Meeting and, where relevant, put to the vote at the Shareholders' Meeting.

In addition, we may be required to transmit personal data to authorities, especially the Federal Financial Supervisory Authority (BaFin), e.g., on the basis of statutory notification requirements in the event that voting rights thresholds defined by law are exceeded. We transmit personal data to courts, arbitration tribunals and legal advisors, where this is necessary to establish, exercise, or defend legal claims.

## 7. Transfer of personal data to countries outside the EU/EEA (third countries)

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 Shareholders' Meetings). If these communications contain personal data (such as motions at Shareholders' Meetings in which the requester is named), this data will also be sent to third parties. Nonetheless, this transmission is necessary to ensure that all shareholders receive the same information, because shareholders in third countries are not excluded from our information requirements.



As such, by transferring this data, we are fulfilling our contractual obligations. The legal basis for the data transfer is Art. 49 (1 b) GDPR.

We use cooperation partners in third countries in connection with the use of artificial intelligence, which may result in the transfer of personal data to such third countries. The third countries in question are India and the United States. Please note that not all third countries have a level of data protection recognized as adequate by the European Commission, i.e. no level of data protection comparable to that in the EU. To ensure an adequate level of data protection for personal data, Deutsche Telekom AG provides appropriate safeguards within the meaning of Art. 44 ff. of the GDPR if there is no adequacy decision for the respective third country (e.g. conclusion of EU standard contractual clauses with recipients in third countries).

## 8. How long will your data be stored for?

We anonymize or erase your personal data as soon as it is no longer needed for the purposes listed above 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 Shareholders' Meeting shall be erased or anonymized by Deutsche Telekom AG three years after the day of the Shareholders' Meeting at the latest unless legal rules prescribe a longer retention period, namely if required by the Stock Corporation Act, the Securities Trading Act, the German Commercial Code and the Fiscal Code, or on the basis of the legitimate prevailing interest of the company, namely to establish, exercise, or defend legal claims.

Otherwise, and subject to other legal regulations – such as the German Stock Corporation Act (AktG), the German Securities Trading Act, the German Commercial Code, and the German Fiscal Code – and subject to the necessity of longer storing for legal proceedings, your personal data will only be saved for a maximum of twelve months in accordance with § 67e (2) AktG, should Deutsche Telekom AG 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 a data subject objects within the deadline the data is not erased.

## 9. What are your data protection rights?

Provided the legal prerequisites are 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
- 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 point 9). You may withdraw consent at any time with effect for the future (Art. 7 (3) GDPR).

You can assert these rights free of charge using the contact details 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:

Landesbeauftragte für Datenschutz und Informationsfreiheit Nordrhein-Westfalen  
Postfach 200444  
40102 Düsseldorf, Germany  
Tel.: + 49 211 384240  
Email: [poststelle@ldi.nrw.de](mailto:poststelle@ldi.nrw.de)

In accordance with § 67 (6) sentence 1 AktG, shareholders can demand information from the company on the personal data entered on them in the shareholders' register. At [telekom.com/hv-service](http://telekom.com/hv-service), under the section for the shareholders' register service, you can view the main data held in the shareholders' register about you and, if necessary, change your address.

## 10. Right to object, article 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 Art. 6 (1 f) GDPR (data processing on an assessment of legitimate interests).** If you object, we will no longer process your personal data, unless we can prove that there are mandatory reasons for processing that override your interests, rights, and freedoms, or that 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 to the contacts set out in section 1 above.

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