

# 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 persons 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 Article 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 reached 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 e-mail them to:  
[aktienregister@telekom.de](mailto:aktienregister@telekom.de).

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

We process your data on the basis of Article 6 (1) Sentence 1 c) GDPR, insofar as is necessary to fulfill our legal obligations. That includes complying with the obligations we are subject to under stock corporation, trading, and tax law, and with regulatory requirements. Consequently, the purpose of data processing includes, in particular, maintenance of the shareholders' register, enabling

shareholders to exercise their rights in connection with the shareholders' meeting, compliance with statutory requirements relating to the shareholders' meeting, disclosure requirements in connection with voting rights' notifications under the German Securities Trading Act (*Wertpapierhandelsgesetz – WpHG*), and fulfilling the burden of proof and retention obligations imposed by the German Stock Corporation Act (*Aktiengesetz – AktG*), the German Commercial Code (*Handelsgesetzbuch – HGB*), and the German Fiscal Code.

In addition, we process your personal data on the basis of Article 6 (1) Sentence 1 f) GDPR. This states that data processing is permitted if it is necessary to protect our legitimate interests or those of a third party, and these are not overridden by your interests or by your fundamental rights and freedoms, which require protection of your personal data. We have a legitimate interest in the processing of personal data to ensure compliance with non-European securities regulations, for capacity planning as well as other organizational planning for the current and future shareholders' meetings, to present and analyze the shareholder structure and its development, including the number of transactions, and to provide overviews of our largest shareholders.

In addition, we process your personal data for the purposes of identification, communication with shareholders, and for any cooperation with shareholders. For this purpose, as well as some of the purposes mentioned above, § 67e (1) AktG describes an explicit standard for consent and purpose under which companies may process personal data of shareholders, in the meaning of Article 6 (1) sentence 1 c), (3), sentence 2 GDPR, for the purposes of identification, communication with shareholders, exercising shareholder rights, maintenance of the shareholders' register, and for cooperation with shareholders.

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 from shareholders or their representatives or from the respective custodian bank (normally via Clearstream Banking AG).



The data processed by Deutsche Telekom AG comprises the last name, first name, title and form of address, as well as other contact details of the shareholder and, where applicable, the shareholder's legal or business representatives, data on the shares (including where they are held), administrative data, as well as data on the exercise of shareholder rights, including the right to vote.

Under § 67 (1) Sentence 2 of the German Stock Corporation Act (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 analogously 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. Which categories of recipients receive your personal data?**

For the purposes set forth in section 2 above, we use service providers that we only provide with the personal data required to perform the relevant services. 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 processing for the meeting in general, and to provide legal advice) as well as service providers in the areas of legal advice, printing, dispatch, and publication media (also independently of the shareholders' meeting).

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

Requests for additional agenda items pursuant to § 122 (2) AktG as well as counter-motions 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. With respect to questions submitted prior to the shareholders' meeting pursuant to § 2 (1) sentence 1 no. 3 and sentence 2 of the German act on temporary measures under company, cooperative, association, foundation, and residential property law to combat the effects of the COVID-19 pandemic (GesRuaCOVBekG) the name of the person asking the question may be disclosed at the shareholders' meeting in the context of providing an answer insofar as the asker consented to this when submitting their question. Consent can be revoked at any time. Revocation can be made in particular by sending an e-mail to hv-service@telekom.de. The personal data belonging to the participants of the shareholders' meeting or the shareholders represented (except in the event when exercising voting rights on behalf of the person concerned) as well as, where necessary, of the shareholders' representatives shall be incorpo-

rated into a list of participants in accordance with § 129 AktG that shall be made accessible to shareholders or their representative in accordance with § 129 (4) AktG.

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.

#### **5. How long will your data be stored for?**

The data recorded in the shareholders' register must normally be retained for ten years after the shares are sold. 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 – 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.

#### **6. What are your data protection rights?**

Provided that the relevant legal conditions are met, you can obtain information from Deutsche Telekom AG about your personal data in accordance with Article 15 GDPR. Furthermore, you are entitled to have your personal data corrected in accordance with Article 16 GDPR, to have it erased in accordance with Article 17 GDPR, to have processing restricted in accordance with Article 18 GDPR, to demand the transfer of certain personal data to you or to a third party appointed by you (right to data portability) in accordance with Article 20 GDPR and to object to processing of the data in accordance with Article 21 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 Article 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  
Phone: +49 (0)211 38434-0  
Fax: +49 (0)211 38424-10  
E-mail: [poststelle@ldi.nrw.de](mailto:poststelle@ldi.nrw.de)

In accordance with Section 67 (6) Sentence 1 of the German Stock Corporation Act (AktG), shareholders can demand information from the company on the personal data entered on them in the shareholders' register. Under [www.telekom.com/hv-service](http://www.telekom.com/hv-service), in the "Shareholders' register service" area, you can view the key personal information saved in the shareholders' register and, if necessary, correct your address.

### **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 Article 6 (1) Sentence 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.

### **Deutsche Telekom AG**

Supervisory Board: Prof. Dr. Ulrich Lehner (Chairman)  
Board of Management: Timotheus Höttges (Chairman),  
Adel Al-Saleh, Birgit Bohle, Srinivasan Gopalan, Dr. Christian P. Illek,  
Thorsten Langheim, Dominique Leroy, Claudia Nemat  
Commercial Register: Local court Bonn HRB 6794  
Registered Office: Bonn