

PRIVACY NOTICE

for the

VIRTUAL ANNUAL GENERAL MEETING

of

AUSTRIACARD HOLDINGS AG

on 30 June 2023

With this privacy notice, we, AUSTRIACARD HOLDINGS AG, would like to inform the participants (shareholders and special voting rights representatives) and viewers of the annual general meeting of AUSTRIACARD HOLDINGS AG about the processing of personal data in connection with the participation in this annual general meeting or with the viewing of the real-time video transmission or the recording of the annual general meeting.

The data controller for the respective data processing activities is AUSTRIACARD HOLDINGS AG, Lamezanstraße 4-8, 1230 Vienna, Austria.

1. Which data categories are being processed?

The following categories of personal data from **shareholders** are processed in the context of the preparation, execution, and follow-up of the annual general meeting: name, address, date of birth, securities account number, class and number of shares, shareholder's voting card number, participation status, participation and voting actions, as well as questions asked via email and the corresponding answers. We receive these personal data from the shareholders or the custodian banks.

The following categories of personal data from **special voting rights representatives** are processed in the context of the preparation, execution, and follow-up of the annual general meeting: name, date of birth and proof of authorization. We receive these personal data from the shareholders or the special voting rights representatives.

The following personal data are automatically transmitted through the respective browser used by **shareholders, special voting rights representatives, and viewers**:

- IP address of the visitor
- Browser of the visitor
- Operating system of the visitor
- Transferred bytes / bandwidth
- Duration of the connection
- Date and time of connection
- Accessed URL
- http status

2. What are the purposes for which personal data is being processed and what is the legal basis?

The data is processed for the purpose of preparing, conducting, and following up on the virtual annual general meeting, fulfilling legal obligations, and publicly broadcasting the annual general meeting in real-time on the internet (as a video with audio). The legal basis for this processing is compliance with legal obligations, such as in particular the verification of the right to participate including the right to vote at the annual general meeting (Art 6 para 1 lit c GDPR in conjunction with Sec 102 et seq Austrian

Stock Corporation Act (*Aktiengesetz*), Sec 1 COVID-19 Corporate Law Act (*COVID-19-GesG*), and Sec 2 and 3 COVID-19 Corporate Law Ordinance (*COVID-19-GesG*)).

The recording of the virtual annual general meeting will be publicly available until 14 July 2023. This is to protect our legitimate interest (legal basis: Art 6 para 1 lit f GDPR) in making the contents of the annual general meeting accessible also to those persons who were prevented from attending (or from accessing the real-time video transmission).

Furthermore, personal data may in certain cases also be processed for the purposes of pursuing legal proceedings, enforcement of rights, or fraud prevention. The legal basis for these processing activities is the necessity to protect our legitimate interests or the legitimate interests of a third party (Art 6 para 1 lit f GDPR).

There is no automated decision-making, including profiling, involved in these processes.

3. Who are the recipients of the personal data?

The personal data will be transferred to the following categories of recipients:

- External service providers (HV Veranstaltungsservice GmbH, with its premises in 8242 St. Lorenzen am Wechsel, Köppel 60, registered under FB 332741 at the Commercial Court Vienna for the IT processing of the virtual annual general meeting, public notary, legal advisor);
- Participants of the annual general meeting (shareholders and special voting rights representatives) with regard to the mandatory list of participants (Sec 117 AktG);
- Public authorities such as, in particular, the competent company register court (Commercial Court of Vienna) or the Financial Market Authority; and
- The public (with regard to the real-time video transmission or the retrievable recording of the annual general meeting).

Personal data will not be transferred to countries outside the EU/EEA.

4. How long will the personal data be retained?

The personal data will be retained only for the period necessary to achieve the purposes of processing or for as long as statutory retention obligations exist. In addition, personal data may in certain cases be processed for asserting or defending legal claims until such claims have expired or become time-barred. Personal data which is automatically transmitted through the respective browser will be deleted no later than one year after access.

5. What rights do data subjects have?

Each data subject affected by the processing of personal data has, subject to the legal requirements, the right to obtain **information, rectification, restriction, objection and erasure of their personal data**. **They also have the right to data portability** regarding the personal data concerning them. These rights can be exercised free of charge by contacting us using the following contact details:

AUSTRIACARD HOLDINGS AG
Lamezanstraße 4-8, 1230 Vienna, Austria
dataprotection@austriacard.at

Furthermore, data subjects have the right to lodge a complaint with the Austrian Data Protection Authority (www.dsb.gv.at) pursuant to Art 77 GDPR.