

## **PRIVACY NOTICE**

for the

### **ANNUAL GENERAL MEETING**

of

### **AUSTRIACARD HOLDINGS AG**

on 9 July 2024

With this privacy notice, we, AUSTRIACARD HOLDINGS AG, would like to inform the participants (shareholders and voting rights representatives) 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 and 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 this personal data, which is not publicly available, from the shareholders or the depository credit institutions / financial service providers / central securities depositories.

The following categories of personal data from **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, which is not publicly available, from the shareholders or the voting rights representatives.

Personal data (audio and video data) from **shareholders** and **voting rights representatives** are processed for the recording of the annual general meeting.

#### **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 annual general meeting, fulfilling legal obligations. 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*)).

The annual general meeting will be recorded with regard to a possible rescission (see also section 4). 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 in the effective pursuit and defence of claims (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 (FN 332741 a) for the IT processing of the annual general meeting, public notary, legal advisors);
- Participants of the annual general meeting (shareholders and voting rights representatives) with regard to the mandatory list of participants (Sec 117 AktG); and
- Public authorities such as, in particular, the competent company register court (Commercial Court of Vienna) or the Financial Market Authority.

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 and for as long as statutory retention obligations exist.

The recording is stored for a period of one month from the date of the resolution in order to safeguard the legitimate interest of the controller in defending legal claims in rescission proceedings (Section 197 AktG in conjunction with Art 6 para 1 lit f GDPR).

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, depending on the circumstances of the individual case, for up to 30 years. Minutes of the annual general meeting and the associated lists of participants are kept for the duration of the company. This is done to safeguard the legitimate interest of the controller in the traceability of significant events under company law (Art 6 para 1 lit f GDPR).

### 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.austria@austriacard.com](mailto:dataprotection.austria@austriacard.com)

Furthermore, data subjects have the right to lodge a complaint with a data protection supervisory authority, in particular at the place of work or residence of the data subject. In Austria, data subjects can contact the Austrian Data Protection Authority ([www.dsb.gv.at](http://www.dsb.gv.at)) in particular.