

Data protection declaration of ProCredit Holding AG

I. Name and address of controller

The controller, within the meaning of the EU General Data Protection Regulation (GDPR) and other national data protection laws of the member states as well as other data protection regulations, is:

*ProCredit Holding AG
Rohmerplatz 33-37
60486 Frankfurt am Main
Germany
Tel.: 069 95 14 37 0
E-mail: pch.info@procredit-group.com
Website: www.procredit-holding.com*

II. Name and address of Data Protection Officer

The Data Protection Officer of the controller is:

*Diana Zaszlos
c/o ProCredit Holding AG
Rohmerplatz 33-37
60486 Frankfurt am Main
Germany
Tel.: 069 95 14 37 0
E-mail: pch.datenschutz@procredit-group.com
Website: www.procredit-holding.com*

III. General information on data processing

1. Scope of personal data processing

In general, we only process personal data of our users if necessary to provide a functional website, content and services. The processing of personal data of our users takes place regularly only after consent of the user. An exception applies in those cases where prior consent cannot be obtained for real reasons and the processing of the data is permitted by law.

2. Legal basis for processing personal data

Insofar as we obtain consent from a data subject for processing operations on personal data, Art. 6(1)(a) EU General Data Protection Regulation (GDPR) serves as the legal basis.

If the processing of personal data is necessary for the performance of a contract to which the data subject is party, the processing is based on Art. 6(1)(b) GDPR. The same applies to such processing operations which are necessary for carrying out pre-contractual measures.

Insofar as the processing of personal data is necessary to fulfil a legal obligation, e.g. to fulfil tax obligations to which our company is subject, Art. 6(1)(c) GDPR serves as the legal basis.

In cases where the processing of personal data may be necessary to protect the vital interests of the data subject or of another natural person, such processing would be based on Art. 6(1)(d) GDPR.

Art. 6(1)(f) GDPR serves as the legal basis for processing, if such processing is necessary for the legitimate interests pursued by our company or a third party, except when these interests are overridden by the interests, fundamental rights and freedoms of the data subject.

3. Data erasure and period for which personal data will be stored

Personal data of the data subject are erased or made unavailable once the purpose of storing the data is no longer applicable. Furthermore, data may be stored if this has been provided for by the European or national legislator in EU regulations, laws or other provisions to which the controller is subject. The data will also be blocked or deleted if a storage period prescribed by the aforementioned standards expires, unless there is a need for further storage of the data to complete or fulfil a contract.

IV. Provision of the website and creation of log files

1. Description and scope of data processing

Every time our website is accessed, our system automatically collects data and information from the computer system accessing our site. The following data are collected:

- (1) Information about the browser type and version used
- (2) Operating system of the user
- (3) Internet service provider of the user
- (4) IP address of the user
- (5) Date and time of access
- (6) Websites directing the user's system to our site

(7) Websites accessed by the user's system via our website

The data are also stored in the log files of our system. These data are not stored together with other personal data of the user.

2. Legal basis for data processing

Art. 6(1)(f) GDPR serves as the legal basis for temporary storage of data and log files.

3. Purpose of data processing

Temporary storage of the IP address by the system is necessary to enable website delivery to the user's computer. For this purpose, the IP address of the user must remain stored for the duration of the session.

Data are stored in log files to ensure the functionality of the website. In addition, the data serve to optimise the website and ensure the security of our information technology systems. An evaluation of the data for marketing purposes does not take place in this context.

Likewise, our legitimate interest in data processing pursuant to Art. 6(1)(f) GDPR is based on these purposes.

4. Duration of storage

Data are erased as soon as they are no longer required for the achievement of the purpose for which they were collected. In the context of collecting data in order to make the website available, this means the end of the respective session.

If the data are stored in log files, this is the case after seven days at the latest. Storage for a further period is possible.

5. Possibility to object and remove

The collection of data for the provision of the website and the storage of data in log files is absolutely necessary for the operation of the website. Consequently, there is no possibility for the user to object.

V. Electronic distribution of the Investor Relations Newsletter

1. Description and scope of data processing

If you have agreed to receive our free Investor Relations Newsletter or if you have signed up to receive it using the form on our website, the following data (mandatory information) will be transmitted to us when you register for the newsletter: first name, last name, e-mail address, company, country. All other information is voluntary.

We use the double-opt-in procedure when sending the newsletter. This means that we will not send you our Investor Relations Newsletter until you have expressly confirmed to us that you have agreed to receive it. We will send you a confirmation e-mail asking you to click on a link to confirm that you wish to receive the Investor Relations Newsletter in the future. By clicking on the confirmation link, you give us your consent to use of your personal data in accordance with Art. 6(1)(a) GDPR. When you register for the newsletter, we save the date and time of registration in order to be able to trace possible misuse of your e-mail address at a later date.

No data will be passed on to third parties in connection with the data processing required for sending the Investor Relations Newsletter. The data will be used exclusively for sending the Investor Relations Newsletter.

2. Legal basis for data processing

If the user has given consent, the legal basis for the processing of data is Art. 6(1)(a) GDPR.

3. Purpose of data processing

The collection of the user's personal data mentioned above serves the purpose of sending the Investor Relations Newsletter with information about our company.

4. Duration of storage

Data are erased as soon as they are no longer required for the achievement of the purpose for which they were collected. With regard to the Investor Relations Newsletter with information about our company, this means that the user's e-mail address is stored until consent is revoked.

5. Possibility to object and remove

The subscription to the newsletter can be cancelled by the user concerned at any time. For this purpose, each newsletter contains a corresponding link. After you have unsubscribed, your e-mail address will be immediately deleted from our newsletter distribution list.

VI. Registration for participation in analyst conference calls, access to webcasts

1. Description and scope of data processing

When clicking on the registration link provided in the invitation to participate in an analyst conference call, you will be asked to enter the following data into the input mask: first name, last name, company and e-mail address. By registering for an analyst conference call, you consent to the processing of your personal data as described below.

Once you have registered for the conference call, ProCredit Holding (PCH) will process the following information: an overview of those who have registered for the conference call and a register of the participants who actually took part in the conference call, including the duration of participation and the telephone number from which the individual participated.

The conference call will be recorded and published on the PCH website as a webcast. If you ask questions during the conference call, your first name, last name and the name of your organisation will be stated along with your question and will subsequently be published as well.

If you would like to replay the webcast on our website, you will be asked to enter the following data into the input mask: first name, last name, company and e-mail address. By entering this information, you agree to the processing of your personal data.

2. Legal basis for data processing

Art. 6(1)(a) and (f) GDPR serve as the legal basis for the processing of personal data in the context of participating in analyst conference calls and obtaining access to webcasts.

3. Purpose of data processing

PCH uses the information provided to administer the conference call and for general investor relations purposes.

4. Duration of storage

The information provided will be stored for up to three years. The records of the conference call will also be available on the PCH website for up to three years.

5. Possibility to object and remove

You may revoke your consent at any time, with effect for the future, by contacting pch.ir@procredit-group.com. You may object to the processing of your personal data, based on the legitimate interest of the controller, via the same channel. We would then have to prove an overriding, legitimate interest to be allowed to continue processing your personal data.

VII. E-mail contact

1. Description and scope of data processing

It is possible to initiate contact using the e-mail address provided on our website. In such cases, the personal data transmitted with the e-mail are stored.

There is no transfer of data to third parties in this context. The data are only used in connection with the conversation, unless the user wishes to be included in a specific mailing list or similar.

2. Legal basis for data processing

Art. 6(1)(f) GDPR serves as the legal basis for the processing of data transmitted in the context of submitting an e-mail. Art. 6(1)(b) GDPR also serves as legal basis if the aim of the e-mail contact is to conclude a contractual agreement.

3. Purpose of data processing

Personal data from an e-mail contact is only processed in order to process the contact. Therein lies the necessary and legitimate interest in processing the data.

4. Duration of storage

Data are erased as soon as they are no longer required for the achievement of the purpose for which they were collected. For personal data transmitted via e-mail, this is the case when the respective conversation with the user has ended. The conversation has ended when the circumstances indicate that the respective matter has been clarified.

5. Possibility to object and remove

The user has the possibility at any time to withdraw his/her consent to the processing of personal data. If the user makes contact with us via e-mail, he/she may also use the same channel to object to the storage of his/her personal data. In such cases, the conversation cannot be continued.

All personal data stored in connection with this contact are then erased.

VIII. Registration for participation in the Capital Markets Day, access to replays

1. Description and scope of data processing

You are able to register for online participation in the Capital Markets Day via the registration link on our website. In order to register, you will be asked to enter the following data in the input mask: Given name, surname, company, interest group and e-mail address. By registering for our Capital Markets Day, you consent to the processing of your personal data as described below.

Once you have registered for a Capital Markets Day, ProCredit Holding (PCH) will process the following information: an overview of those who have registered for the event as well as a list of the participants who actually participate in the event, including the time at which they log in to the online event. An overview of the persons asking questions during the Q&A round will also be compiled.

The Capital Markets Day will be recorded and published on the PCH website as a webcast. Should you ask questions during the event, your given name, surname and the name of your organisation can be specified along with your question and can also be published afterwards.

In order to conduct the online event, we commission technical service providers to process the data in accordance with our instructions.

If you would like to replay the webcast on our website, you will be asked to enter the following data into the input mask: first name, last name, company and e-mail address. By entering this information, you agree to the processing of your personal data.

2. Legal basis for data processing

Art. 6(1)(a) and (f) GDPR serve as the legal basis for the processing of personal data in the context of the Capital Markets Day.

3. Purpose of data processing

The information made available will be used by PCH for the purpose of conducting the Capital Markets Day as well as for general investor relations purposes.

4. Duration of storage

The information provided will be stored for up to three years. Recordings of the event will also be available on the PCH website for up to three years.

5. Possibility to object and remove

You may revoke your consent at any time, with effect for the future, by contacting pch.ir@procredit-group.com. You may object to the processing of your personal data, based on the legitimate interest of the controller, via the same channel. We would then have to prove an overriding, legitimate interest to be allowed to continue processing your personal data.

IX. Rights of the data subject

If your personal data are processed, you are a data subject within the meaning of the GDPR and you have the following rights towards the controller:

1. Right to information

You can ask the controller to confirm whether your personal data are being processed by us.

If such processing is taking place, you can ask the controller to provide the following information:

- (1) Purposes for which the personal data are being processed

- (2) Categories of personal data being processed
- (3) Recipients or categories of recipients to whom your personal data have been or will be disclosed
- (4) Planned duration of the storage of your personal data or, if concrete information about this is not available, criteria for the determination of the storage period
- (5) Existence of a right to request from the controller rectification or erasure of personal data, a right to restriction of processing of personal data concerning the data subject or a right to object to such processing
- (6) Right to lodge a complaint with a supervisory authority
- (7) All available information on the origin of the data if the personal data are not collected from the data subject
- (8) Existence of automated decision-making, including profiling, referred to in Art. 22(1) and (4) GDPR and, at least in these cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject

You have the right to request information as to whether your personal data are being or have been submitted to a third country or to an international organisation. In this context, you may request to be informed of the appropriate guarantees pursuant to Art. 46 GDPR in connection with the submission.

2. Right to rectification

You have a right of rectification and/or completion towards the controller if your personal data processed are incorrect or incomplete. The controller shall undertake the rectification of the data without delay.

3. Right to restriction of processing

Under the following conditions you may request that the processing of your personal data be restricted:

- (1) If you contest the accuracy of your personal data for a period enabling the controller to verify the accuracy of the personal data
- (2) If the processing is unlawful and you decline to have the personal data erased and instead request that the use of your personal data be restricted

- (3) If the data controller no longer needs the personal data for the purposes of the processing, but you need them to assert, exercise or defend legal claims
- (4) If you have filed an objection against the processing pursuant to Art. 21(1) GDPR and it has not yet been determined whether the legitimate reasons of the controller outweigh your reasons

Where processing of your personal data has been restricted, these data shall, with the exception of storage, only be processed with your consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

If the processing restriction is restricted according to the above conditions, you will be informed by the controller before the restriction is removed.

4. Right to erasure

a) Obligation to erase

You shall have the right to request that the controller erase your personal data without undue delay and the controller shall have the obligation to erase these data without undue delay if one of the following reasons applies:

- (1) Your personal data are no longer necessary in relation to the purposes for which it was collected or otherwise processed
- (2) You revoke your consent on which the processing was based pursuant to Art. 6(1)(a) or Art. 9(2)(a) GDPR, and there is no other legal basis for the processing
- (3) You file an objection against the processing pursuant to Art. 21(1) GDPR and there are no overriding legitimate reasons for the processing, or you file an objection against the processing pursuant to Art. 21(2) GDPR
- (4) Your personal data have been processed unlawfully
- (5) Your personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject
- (6) Your personal data have been collected in relation to the offer of information society services referred to in Art. 8(1) GDPR

b) Information to third parties

Where the controller has made your personal data public and is obliged pursuant to Art. 17(1) GDPR to erase the personal data, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform controllers which are processing the personal data that you, as the data subject, have requested the erasure by such controllers of any links to, or copy or replication of, those personal data.

c) Exceptions

The right to erasure does not apply if the processing is necessary for:

- (1) Exercising the right of freedom of expression and information
- (2) Compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
- (3) Reasons of public interest in the area of public health pursuant to Art. 9(2)(h) and (1) as well as Art. 9(3) GDPR
- (4) Archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Art. 89(1) GDPR in so far as the right referred to in paragraph a) is likely to render impossible or seriously impair the achievement of the objectives of that processing or
- (5) Establishment, exercise or defence of legal claims

5. Right to notification

If you have exercised your right of rectification, deletion or limitation of processing against the controller, the controller is obliged to notify all recipients to whom your personal data have been disclosed of such rectification, erasure or restriction of processing, unless this proves impossible or involves disproportionate effort.

You have the right to be notified about these recipients by the controller.

6. Right to data portability

You have the right to receive your personal data, which you have provided to the controller, in a structured, common and machine-readable format. In addition, you have the right to transmit these data to another controller without obstruction by the controller to whom the personal data was provided, provided that:

- (1) Processing is based on consent pursuant to Art. 6(1)(a) GDPR or Art. 9(2)(a) GDPR or on a contract pursuant to Art. 6(1)(b) GDPR
- (2) Processing is carried out by automated means.

In exercising this right, you also have the right to have your personal data transferred directly from one data controller to another data controller, insofar as this is technically feasible. In so doing, care must be taken to ensure that the freedoms and rights of other persons are not impaired.

The right to data portability does not apply to the processing of personal data that is necessary in order to perform a task that is in the public interest or was assigned to the controller in the exercise of public authority.

7. Right to object

For reasons relating to your particular situation, you have the right to object at any time to the processing of your personal data that takes place on the basis of Art. 6(1)(e) or (f) GDPR; this also applies to profiling carried out on the basis of these provisions.

The controller shall no longer process your personal data unless the controller demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms, or for the establishment, exercise or defence of legal claims.

If your personal data is processed for direct marketing purposes, you have the right to object at any time to the processing of your personal data for the purpose of such marketing; this also applies to profiling to the extent that it is related to direct marketing.

If you object to processing for direct marketing purposes, your personal data will no longer be processed for such purposes.

You have the option to exercise your right to object in conjunction with the use of information society services – regardless of Directive 2002/58/EC – by way of automated processes in which technical specifications are used.

8. Right to withdraw statement of consent regarding data protection

You have the right to withdraw your consent regarding data protection at any time. The withdrawal of consent shall not affect the legality of the processing carried out on the basis of the consent until withdrawal.

9. Automated individual decision-making, including profiling

You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you. This shall not apply if the decision is:

- (1) Necessary for entering into, or performance of, a contract between the data subject and a data controller
- (2) Authorised by Union or Member State law to which the controller is subject and which also lays down suitable measures to safeguard your rights and freedoms and legitimate interests
- (3) Based on your explicit consent

However, these decisions must not be based on special categories of personal data referred to in Article 9(1) GDPR, unless Art. 9(2)(a) or (g) applies and suitable measures to safeguard your rights and freedoms and legitimate interests are in place.

In the cases referred to in points (1) and (3), the data controller shall implement suitable measures to safeguard your rights and freedoms and legitimate interests, at least the right to obtain human intervention on the part of the controller, to express his or her point of view and to contest the decision.

10. Right to lodge a complaint with a supervisory authority

Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement if you feel that the processing of your personal data infringes the GDPR.

The supervisory authority with which the complaint has been lodged will inform the complainant on the progress and the outcome of the complaint including the possibility of a judicial remedy pursuant to Article 78 GDPR.

The supervisory authority for PCH is:

The Hessian Commissioner for Data Protection and Freedom of Information

Postfach 3163

65021 Wiesbaden

Federal Republic of Germany