

Only the German version shall be legally binding, the English translation serves information purposes only.

Data protection information for shareholders and shareholders' representatives at the General Meeting of ProCredit Holding AG

One of the key concerns of the EU General Data Protection Regulation is the transparency of data processing. We take matters of data protection for our shareholders and their authorised representatives/proxies very seriously.

The following information is intended to provide you with an overview of how we process your personal data in connection with preparing, conducting and following-up on the General Meeting and your rights under the prevailing data protection law.

1. Who is responsible for processing data and who can I contact about this matter?

ProCredit Holding AG, Rohmerplatz 33-37, 60486 Frankfurt am Main, Germany (hereinafter also "us", "our", "ourselves" and "we") is responsible for data processing.

You can contact our Data Protection Officer at the above address or by e-mail at pch.datenschutz@procredit-group.com. If you have any questions about data protection with regard to the share register, please contact us at the above address or by e-mail at PCH.ir@procredit-group.com.

2. What data do we process and from where do we obtain your data?

We process your personal data in compliance with the EU General Data Protection Regulation (GDPR), the German Data Protection Act (BDSG), the German Stock Corporation Act (AktG) as well as any other relevant legal provisions.

Shares of ProCredit Holding AG are registered shares. In the case of registered shares, section 67 AktG stipulates that they must be entered in the Company's share register along with certain data. In connection with our General Meeting, we therefore process the following personal data of our shareholders and, if applicable, their authorised representatives/proxies

- Name, date of birth
- Contact details (e.g. postal address, e-mail address)
- Shareholder and share-related data (e.g. number of shares, serial numbers, in the case of par value shares also the amount)
- Other data arising in connection with the General Meeting (e.g. admission ticket number, voting card number, voting behaviour, motions, election nominations, other requests from shareholders or their authorised representatives/proxies).

If shareholders or their authorised representatives/proxies contact us, we also process the personal data required to respond to the particular request, such as telephone numbers.

Regulations oblige the credit institutions involved in the acquisition or safekeeping of your ProCredit registered shares to forward to us any details relevant for maintaining the share register as well as information on your nationality.

3. For what purposes and on what legal basis is your data processed?

We use your personal data for the following purposes.

a. Preparing, conducting and following-up on the General Meeting

We process your personal data in order to prepare, conduct and follow up on the General Meeting and to fulfil our legal obligations to shareholders and their authorised representatives/proxies in this context, in particular to

- handle the registration and participation of shareholders and their authorised representatives/proxies at the General Meeting (e.g. verification of eligibility to participate, dispatch of admission tickets, identity checks, preparation of the list of participants and making it available for inspection) and
- enable shareholders and their authorised representatives/proxies to exercise their rights at the General Meeting (in particular the granting and revocation of powers of attorney and instructions to the company's voting representatives and the exercise of voting rights, the right to submit motions, the right to information and the right to object to resolutions of the General Meeting).

The legal basis for this processing is Art. 6 (1)(c) GDPR in conjunction with section 67e (1) AktG and our obligations under stock corporation law pursuant to sections 118 et seq. AktG.

In connection with preparing, conducting and following up on the General Meeting, we may also transfer your data to our legal advisers, tax advisers or auditors, as we have a legitimate interest in organising the General Meeting in accordance with the relevant legal provisions and the processing is necessary to obtain external advice on this. The legal basis for this processing is Article 6 (1)(f) GDPR.

b. Processing of voting rights notifications

Furthermore, we process data that is transferred to us by you or other parties obliged to notify us in the context of voting rights notifications in accordance with the Securities Trading Act (WpHG). The legal basis for the processing in these cases is the respective legal regulations and Article 6 (1)(c) GDPR.

c. Processing to fulfil other legal obligations, in particular retention requirements

In addition, we may also process your personal data to fulfil other legal obligations, such as supervisory regulations or requirements under securities law, as well as data retention obligations under company, commerce and tax law. In order to comply with the provisions of the German Stock Corporation Act, for example when authorising the voting representatives nominated by the Company for the General Meeting, we must record the data that serves as proof of said authorisation for verification purposes and retain it for three years in an access-protected manner (section 134 (3) sentence 5 AktG). The legal basis for processing in such cases is provided by the relevant legislation in conjunction with article 6 (1)(c) GDPR.

d. Other Processing purposes

Additionally, we process personal data to protect our legitimate interests in accordance with Article 6 (1)(f) GDPR.

A legitimate interest exists with regard to compliance with non-European securities regulations, e.g. if we have to exclude individual shareholders from information on subscription offers in the event of capital increases due to their nationality or place of residence in order to comply with the relevant regulations, or with regard to the use of your email address (if lodged) for the electronic transmission of the invitation.

Should we wish to process your personal data for a purpose not mentioned above, we will inform you of this in advance in accordance with the statutory provisions.

4. Who has access to my data?

At ProCredit Holding AG, the only persons given access to your data are those who need it in order to fulfil our obligations towards you. Service providers and agents engaged by us can also be provided with data for these purposes. If such service providers or agents come into contact with the personal data of our shareholders, this is done solely within their function as Processor. We carefully select these service providers and they work exclusively in accordance with our instructions, which we ensure through contractual regulations, technical and organisational measures, as well as supplementary control checks. Our service providers are companies that fall under the following categories: Service providers for the maintenance of the share register, IT service providers, and service providers for the preparation and conduct of the General Meeting.

In connection with preparing, conducting and following up on the General Meeting, we may also transfer your personal data to our legal advisers, tax consultants or auditors.

In connection with conducting the General Meeting, your personal data may be disclosed to other duly registered shareholders or their authorised representatives under certain circumstances (e.g. by granting access to the legally required list of participants, by publishing the motions you have submitted that are subject to publication or other requests via the communication channels described in the invitation to the General Meeting).

In certain circumstances, we may also transfer your data to other recipients who are authorised to process your data on their own responsibility. These include public authorities, for example when complying with reporting obligations (such as when statutory voting rights thresholds are exceeded).

5. Will my data be transmitted to a third country?

We do not intend to transfer your personal data to a country outside the European Economic Area (EEA) or the European Union (EU) (**third country**) or to any international organisation. Nor do we pass on personal data to service providers outside the EEA. Insofar as shareholders are from third countries, they may receive information (such as the invitation to the General Meeting). If these notifications also contain personal data (e.g. motions for the General Meeting stating the name of the applicant), this data will also be transmitted to third countries. The regulations laid down in the GDPR do not apply directly in third countries. If the EU Commission has not ruled that there is an adequate level of data protection in such a third country, there may be a lower level of protection for your personal data there. Transmission is nevertheless necessary in order to inform all shareholders equally, as we are not permitted to exclude shareholders from third countries from our information. By transferring the data, we therefore fulfil our contractual obligations. The legal basis for the transfer is Art. 49 (1)(b) GDPR.

6. How long will my data be stored?

As a rule, we anonymise your personal data or delete it as soon as it is no longer required for the above-mentioned purposes unless we are legally required to store it for longer periods of time due to legal obligations to provide proof and to retain data (e.g. in accordance with the German Stock Corporation Act (AktG), the German Commercial Code (HGB), the German Fiscal Code (AO)). Regulations require that data recorded in connection with general meetings must be stored for up to ten years. We are obliged to retain the data recorded in the share register for a further ten years after the sale of the respective shares. Beyond this, we only store personal data in individual cases if this is necessary in connection with claims made for or against our Company.

7. As a shareholder, am I obliged to provide data?

As a shareholder, you are obliged to provide the Company with the above-mentioned personal details. The credit institutions involved in the transfer or safekeeping of registered shares are also obliged to provide ProCredit Holding AG with the information required for the maintenance the share register (section 67 (1) and (4) AktG).

8. What are my rights as a data subject?

If the legal requirements are met, you as the data subject have certain rights: You can request information concerning the personal data stored about you. You have the right to correct any data about you that is incorrect. In addition, under certain conditions, you can request the deletion of your personal data or a limitation of the processing (e.g. if your data were to be processed unlawfully). **If we process your data to protect our legitimate interests, you have the right to object to this processing should there be any reasons relating to your particular situation that conflict with such data processing.** We will then no longer process your personal data unless we can demonstrate overriding compelling legitimate grounds on our part. Other rights include the right to portability of your data and the right to revoke at any time any consent you may have given, without affecting the legitimacy of the processing prior to revocation.

Should you wish to exercise your rights, you can contact our data protection officer at the above address. You also have the right to complain to a public data protection authority. The data protection authority responsible for ProCredit Holding AG is:

The Hessian Commissioner for Data Protection and Freedom of Information,
Postfach 3163, 65021 Wiesbaden.

Further information on data protection at ProCredit can also be found on our website at <https://www.procredit-holding.com/data-protection/>