

## **Data protection notice for shareholders, proxies and guests of the Annual General Meeting of Telefónica Deutschland Holding AG.**

The purpose of this document is to inform shareholders of our company and their proxies, who authorize shareholders in their place to attend the Annual General Meeting, as well as to inform guests. If you, as a shareholder, register a person with us as your proxy, please inform this person about the contents of this information sheet.

The data of shareholders, their proxies and the guests will be processed by us (Telefónica Deutschland Holding AG) in different ways in some cases. We refer to the different data processing at the relevant points in this leaflet. Without express reference, the information applies to both shareholders and their proxies.

### **1. Contact Information Accountable Entity**

Telefónica Deutschland Holding AG, Georg-Brauchle-Ring 50, 80992 Munich, Germany,  
[IR-Deutschland@telefonica.com](mailto:IR-Deutschland@telefonica.com).

### **2. Contact Information Data Protection Officer**

Telefónica Deutschland Holding AG, Data Protection Officer, Georg-Brauchle-Ring 50, 80992 Munich, Germany, [IR-Deutschland@telefonica.com](mailto:IR-Deutschland@telefonica.com).

### **3. Personal Data**

Personal data means any information relating to an identified or identifiable natural person (hereinafter "data subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or one or more special characteristics.

### **4. Purposes and Legal Bases of Data Processing**

We process personal data within the framework of the requirements of data protection law. We are subject to various legal obligations for the fulfillment of which the processing of your personal data may be necessary (Art. 6 (1) c DSGVO): under the German Stock Corporation Act (AktG), under the German Securities Trading Act (WpHG) in conjunction with our Articles of Association, and otherwise under commercial, corporate, competition and tax laws, data protection laws and other general legal obligations or official directives.

### **5. Recipients of Personal Data**

Employees of our company have access to your personal data to the extent necessary to fulfill the above-mentioned purposes.

We use service providers to assist us with data processing as part of order processing (service providers for the following services: organization, preparation and execution of the Annual General Meeting including voting processes, online portal for the Annual General Meeting - including admission ticket ordering and authorization for the Annual General Meeting -, IT operations, file/data carrier destruction, archiving and post-processing; in the case of shareholders, additional service providers for maintaining the share register and for mail processing). These service providers are subject to strict contractual agreements, including confidentiality agreements.

On a contractual basis, recipients outside our company who do not work for us as part of commissioned processing also process personal data to the extent required. The recipients are obliged to comply with data protection on the basis of legal or professional obligations or contractual agreements. Banks (e.g., for the payment of dividends) and logistics providers used for mail delivery process personal data of shareholders. Interpreters acting in connection with the Annual General Meeting, telecommunications service providers (e.g. to make calls, etc.), tax advisors/auditors (e.g. to ensure and verify accounting and legal requirements) and lawyers (e.g. to represent and enforce our legal interests) process personal data of shareholders and proxies. Our notary receives personal data from the shareholders concerned insofar as this is necessary for the proper conduct of the Annual General Meeting (e.g. when an objection is asserted).

In individual cases we are required by law to disclose personal data to government agencies (e.g. requests for information from investigating authorities) or natural persons/legal entities (e.g. to assert claims).

Other shareholders and their proxies may inspect the data recorded on shareholders and their proxies in the register of participants required by stock corporation law.

## **6. Data Processing in third Countries**

In principle, we only process your personal data in Germany and in the European Union.

Personal data will only be processed outside the European Union (so-called third countries) if an "adequacy decision" of the European Commission (Art. 45 GDPR) exists for this third country, "appropriate safeguards" (Art. 46 GDPR) or "internal data protection rules" (Art. 47 GDPR) are in place at the recipient. General information on adequacy decisions can be found at [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries\\_de](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_de), on available suitable safeguards at [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries\\_de](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_de) and on internal data protection rules at [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/binding-corporate-rules\\_de](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/binding-corporate-rules_de). For further information, you may contact the data controller.

In addition, your personal data will be processed in third countries if you have consented or if there is a legal obligation to do so.

## **7. Deletion of Personal Data**

We generally delete personal data when it is no longer required (see above purposes).

We are required by law to retain the data provided by shareholders for the share register for 10 years after the sale of the shares. For shareholder data collected in connection with the Annual General Meeting, the statutory retention period is 3 years. Declarations of proxy submitted to us will be retained for 3 years.

Data provided for admission ticket issuance and authorization in the online portal for participation in the Annual General Meeting will be retained for 3 years.

Beyond this, we only retain personal data if this is necessary in connection with the assertion or defense of our claims (statutory limitation period of 30 years).

## **8. Provision of your Data**

Shareholders are required by law to provide the Company with certain information for the purposes of maintaining the share register, otherwise the shareholding cannot be entered in the register and the shares cannot be transferred.

Shareholders and proxies are required by law and by the Articles of Association to register before attending the Annual General Meeting. Shareholders and proxies cannot attend the Annual General Meeting or cast a vote without registering their shares.

## **9. Origin of personal data**

We do not only process personal data that we receive directly from the data subject. In these cases, we receive personal data from third parties:

- We receive shareholder information relevant to the maintenance of the share register from cooperating credit institutions.
- We receive the names and addresses of proxies from shareholders who register proxies to attend the Annual General Meeting in the online portal.

## **10. Your Rights**

As a data subject within the meaning of the GDPR, you generally have the following rights:

- You have the right to receive information about your processed data (Art. 15 DSGVO). Please contact [IR-Deutschland@telefonica.com](mailto:IR-Deutschland@telefonica.com) for this purpose.
- If you wish to correct incorrect personal data or complete incomplete data (Art. 16 DSGVO), please contact [IR-Deutschland@telefonica.com](mailto:IR-Deutschland@telefonica.com) or arrange for an adjustment in the share register.
- You have a right to have your personal data deleted under certain legal conditions (Art. 17 DSGVO). Please contact [IR-Deutschland@telefonica.com](mailto:IR-Deutschland@telefonica.com) for this purpose.
- You have a right to restriction of processing under certain legal conditions (Art. 18 DSGVO). Please contact [IR-Deutschland@telefonica.com](mailto:IR-Deutschland@telefonica.com) for this purpose.
- You have a right to receive or transfer the personal data concerning you under certain legal conditions (Art. 20 GDPR). Please contact [IR-Deutschland@telefonica.com](mailto:IR-Deutschland@telefonica.com) for this purpose.
- You have the right to revoke any consent you may have given to the processing of your personal data at any time with effect for the future. The lawfulness of the processing carried out on the basis of the consent until the revocation remains unaffected by the revocation. Please contact [IR-Deutschland@telefonica.com](mailto:IR-Deutschland@telefonica.com) for this purpose.
- You have a right of objection under certain legal conditions. We inform you about this in the following section of this data protection leaflet.

#### 11. Your Right to Object (Art. 21 DSGVO)

**You have the right to object at any time, on grounds relating to your particular situation, to the processing of your personal data that is carried out on the basis of Art. 6(1)(f) DSGVO. We will then no longer process your personal data for these purposes, unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the purpose of asserting, exercising or defending legal claims, or for compliance with legal obligations.**

**You can lodge your objection via [IR-Deutschland@telefonica.com](mailto:IR-Deutschland@telefonica.com).**

#### 12. Modification to the Data Protection Information Leaflet

Since changes in the law or changes in our internal business processes may make it necessary to adapt this Data Protection Information leaflet, which we reserve the right to do accordingly, you may find the then current version at <http://www.telefonica.de> in the section Investor Relations/ AGM.

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