

## Information on the processing of personal data for shareholders and their proxies in the context of the PUMA SE virtual Annual General Meeting

### 1. General Information

#### a) Introduction

PUMA SE attaches great importance to the protection of your data and your privacy. In this privacy policy we inform you about which personal data of our shareholders and their authorized representatives we process in connection with the preparation, execution and follow-up of the virtual Annual General Meeting and which rights you are entitled to according to the regulation EU 2016/679 (Data Protection Basic Regulation - DSGVO) and the Federal Data Protection Act (BDSG) regarding the processing of your data.

We will conduct the Annual General Meeting in 2021 without the physical presence of shareholders and their proxies as a virtual Annual General Meeting with the option of joining the virtual Annual General Meeting. The shareholders and their proxies will therefore not be able to physically attend the Annual General Meeting. They can, however, follow the entire virtual Annual General Meeting by video and audio transmission via the PUMA InvestorPortal, which is also used for electronic connection to the virtual Annual General Meeting. The PUMA InvestorPortal is operated by our service provider Computershare Deutschland GmbH & Co. KG, Elsenheimerstr. 61, 80687 Munich, Germany, exclusively on our behalf and according to our instructions. The PUMA InvestorPortal can be accessed at <http://about.puma.com>, there under INVESTOR RELATIONS / ANNUAL GENERAL MEETING / PUMA InvestorPortal.

#### b) Persons responsible for the processing of personal data

PUMA SE

PUMA Way 1

91074 Herzogenaurach

Germany

E-mail: [datenschutz@puma.com](mailto:datenschutz@puma.com)

#### c) Contact details of the Data Protection Officer

PUMA SE

Data Protection Officer

PUMA Way 1

91074 Herzogenaurach  
Germany  
Email: datenschutz@puma.com

## 2. Categories of Data Processed

In connection with the virtual Annual General Meeting, we process the following data of our shareholders as data controllers in accordance with data protection law:

- First and last name, title;
- address and other contact data;
- class of shares;
- type of ownership of the share;
- number of shares;
- access data for the PUMA InvestorPortal;
- Other data provided when registering for the virtual Annual General Meeting (e.g. e-mail address or mobile phone number).

In addition, we process the name and place of residence (city) of the representative authorized by the shareholder, if applicable. If shareholders or their proxies contact us, we also process the personal data required to respond to the respective request, such as the email address or telephone number. In addition, we may also process information on motions or election proposals submitted by shareholders in connection with the virtual Annual General Meeting.

When you visit the PUMA InvestorPortal on the internet, we collect data on access to the PUMA InvestorPortal. The following data and device information is logged in the web server log files:

- Retrieved or requested data;
- Date and time of access;
- Message whether the retrieval was successful;
- Type of the web browser used;
- referrer URL (the previously visited page);
- IP address;
- session ID; and

- Login.

Your browser automatically transfers this data to us when you visit the PUMA InvestorPortal.

We also use so-called web storage functions. For this purpose, small text files are stored in the local memory of your browser on your end device and stored there. Within the scope of the session storage technology, we collect information about the respective authentication token (i.e. your "virtual" admission ticket) and your session data (so-called session data) after your login, including the granting of consent to our terms of use. This enables us to recognize you as a user if you need to switch to another page of the portal during an active session, return to our website or reload the page. In addition, we use the so-called local storage function to save the time stamp of your login, which for security reasons enables an automatic logout after 30 minutes of inactivity. This data is automatically deleted when you close your browser. In your browser menu, you will find information on how you can technically prevent web storage objects from being allowed and which setting your browser uses to inform you when a new web storage object is placed. Please note that some functions of our website may no longer be available if web storage objects are deactivated.

Finally, we also process information on motions or election proposals submitted by shareholders or their proxies in relation to the virtual Annual General Meeting and on your voting behavior.

### **3. Purpose and legal basis of the processing**

The purpose of processing the above-mentioned data is to enable shareholders to be connected to the virtual general meeting (e.g. by checking their entitlement to be connected) and to enable shareholders to exercise their rights in the virtual general meeting. Via the PUMA InvestorPortal you can, among other things, exercise your voting rights by means of electronic absentee voting, authorize the Company's proxies and issue instructions, submit questions or register objections. To use the PUMA InvestorPortal, you must log in with your access data, which you will receive with your registration confirmation.

#### **a) PUMA InvestorPortal**

The processing of the above-mentioned access data and device information in web server log files as well as the use of the web storage elements are necessary for the technical provision of the PUMA InvestorPortal as well as for the detection of misuse, troubleshooting and to ensure the smooth running of the virtual Annual General Meeting. In this respect, we have a legitimate interest in making the PUMA InvestorPortal available as a service for shareholders and their proxies so that they

can exercise their shareholder rights in a user-friendly manner and join the virtual general meeting. The legal basis for these processing operations is Art. 6 para. 1 letter f) DSGVO.

#### **b) Identity check**

When you register on the PUMA InvestorPortal, we process your registration information in order to verify your entitlement to attend the virtual general meeting as a shareholder or proxy or to take preparatory measures. This processing is necessary for the proper conduct of the virtual Annual General Meeting according to §§ 118 ff. AktG<sup>1</sup> is mandatory. If you do not provide the required personal data, we will not be able to allow you to participate in the virtual Annual General Meeting, to vote by electronic mail, to authorize the proxies of the Company or to submit questions. In addition, we may process personal data in order to comply with other legal obligations, such as regulatory requirements and obligations under stock corporation, securities, tax and commercial law to retain data. The legal basis for this processing is the aforementioned legal regulations in conjunction with Art. 6 Para. 1 lit. c) of the DSGVO.

#### **c) Preparation, implementation and follow-up of the virtual general meeting**

We process your personal data in order to process the registration and connection of shareholders and their proxies for the virtual Annual General Meeting (e.g. checking the entitlement to be connected, sending registration confirmations) and to enable shareholders and their proxies to exercise their rights within the framework of the virtual Annual General Meeting (including issuing and revoking authorizations and instructions to the company's proxies).

In particular, we also process your voting behavior, provided that you or your proxy exercise your voting rights by means of electronic absentee voting via the PUMA InvestorPortal, in order to ensure the proper resolution and valuation of votes within the scope of the virtual Annual General Meeting. In addition, we process information about your objection to resolutions of the virtual Annual General Meeting, provided that you declare such objection during the virtual Annual General Meeting using the corresponding function of the PUMA InvestorPortal.

Legal basis for these processing is Art. 6 para. 1 lit. c) DSGVO in connection with our obligations under stock corporation law according to §§ 118 ff. AktG and if applicable in connection with § 1 para. 2 No. 2 and 4 of the law on Measures in Corporate, Cooperative, Association, Foundation and Condominium Law to Combat the Effects of

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<sup>1</sup> The provisions of the AktG apply to the company as per Articles 9(1)(c)(ii) and 10 of Council Regulation (EC) No 2157/2001 of 8 October 2001 on the Statute for a European company (SE), unless indicated otherwise in the special provisions of the SE Regulation.

the COVID-19 Pandemic, as extended until 31 December 2021 and amended (C-19 AuswBekG).

The processing of your personal data is necessary for the proper conduct of the virtual Annual General Meeting. If you do not provide us with the necessary personal data, we may not be able to connect you to the virtual Annual General Meeting.

#### **d) Right to ask questions**

If you as a shareholder make use of the opportunity to submit questions in advance of the virtual Annual General Meeting via the PUMA InvestorPortal, your name will be mentioned during the virtual Annual General, provided that you have explicitly indicated this when submitting the question via the PUMA InvestorPortal.

#### **e) Legal retention periods**

In addition, your personal data may also be processed in order to fulfil other legal obligations, such as regulatory requirements and storage obligations under stock corporation, commercial and tax law. For example, we are obliged to record the power of attorney granted when authorizing the proxy appointed by us for the virtual Annual General Meeting in a verifiable manner and to keep it for three years in an access-protected manner. In these cases, too, Art. 6 (1) c) DSGVO forms the relevant legal basis.

### **4. Categories of Recipients of the Data**

Service providers of the Company who are commissioned for the purpose of preparing, conducting and following up the virtual Annual General Meeting will only receive from the Company such personal data as are necessary for the execution of the commissioned service and will process the data exclusively on behalf of and according to the instructions of PUMA SE. All our employees and all employees of external service providers, who have access to and/or process personal data, are obliged to treat these data confidentially.

If a shareholder requests that items be placed on the agenda, the company will disclose these items, stating the name of the shareholder, if the requirements according to the regulations of the Stock Corporation Act are met. Likewise, the company will make counter motions and election proposals of shareholders available on the company's website, indicating the name of the shareholder, if the requirements under the provisions of German stock corporation law are met.

Finally, we may be obliged to transmit your personal data to other recipients, such as when publishing voting right notifications in accordance with the provisions of the German Securities Trading Act, or to authorities in order to comply with statutory notification obligations (e.g. to financial or criminal prosecution authorities).

Your data will only be processed in countries that are members of the European Union.

## **5. Data Sources**

We, or the service providers we have commissioned, receive the personal data of shareholders either from the shareholders themselves or, via our registration office, from the banks of shareholders who have commissioned them to hold our shares in safe custody (so-called deposit shares).

If you act as a proxy for a shareholder, we will receive your personal data from the shareholder who has granted you the power of attorney and directly from you if your conduct at the virtual Annual General Meeting is affected.

## **6. Storage Duration**

As a matter of principle, we make personal data anonymous or delete it if it is no longer required for the above-mentioned purposes and does not conflict with statutory regulations on proof and storage (e.g. under the German Stock Corporation Act, the German Commercial Code, the German Fiscal Code or other legal provisions). If required by law or if the company has a legitimate interest in the storage of personal data, for example in the event of judicial or extrajudicial disputes on the occasion of the virtual general meeting, longer storage of the data is possible. However, the personal data will be deleted afterwards.

## **7. Rights of Data Subjects**

As data subjects, shareholders and their proxies may contact our data protection officer named in 1. c) with an informal notification in order to exercise their legal rights under the DSGVO. If the legal requirements are met, you may be entitled to the following rights:

- the right to obtain information on data processing and a copy of the processed data (right of access, Art. 15 DSGVO)
- the right to request the correction of incorrect data or the completion of incomplete data (right of rectification, Art. 16 DPA)

- the right to demand the immediate deletion of personal data (right to deletion, Art. 17 DSGVO)
- the right to demand the restriction of data processing (right to restrict processing, Art. 18 DSGVO)
- the right to receive the personal data concerning you that you have provided to a responsible party in a structured, common and machine-readable format, and also to transmit these data to another responsible party without hindrance by the responsible party (right to data transferability Art. 20 DSGVO)

**As far as we process your data to protect legitimate interests of PUMA SE or a third party, you have the right to object to the processing of personal data concerning you at any time for reasons arising from your particular situation (right of objection, art. 21 DSGVO). The data processing will then be terminated unless we can prove compelling reasons for processing worthy of protection which outweigh your interests, rights and freedoms, or if the processing serves the assertion, exercise or defence of legal claims.**

Irrespective of this, every shareholder and every authorized representative has the right of appeal to a competent data protection supervisory authority pursuant to Art. 77 DSGVO.

PUMA SE

*The Management Board*