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

#### 1. General Information

#### a) Introduction

PUMA SE attaches great importance to the protection of your data and your privacy. In this privacy statement, we inform you about the personal data of our shareholders and their proxies that we process in connection with the preparation, implementation and follow-up of the Annual General Meeting and what rights you have in accordance with Regulation EU 2016/679 (General Data Protection Regulation - DSGVO) and the German Federal Data Protection Act (BDSG) with regard to the processing of your data.

We will conduct the Annual General Meeting in 2023 as a physical meeting. Shareholders and their proxies may attend the Annual General Meeting in person and exercise their voting rights themselves. In addition, shareholders can cast their votes electronically via the PUMA InvestorPortal. The PUMA InvestorPortal is operated by our service provider Computershare Deutschland GmbH & Co. KG, Elsenheimerstr. 61, 80687 Munich, exclusively on our behalf and according to our instructions. The PUMA InvestorPortal can be accessed at http://about.puma.com, under INVESTORS / MAIN ASSEMBLY / PUMA InvestorPortal.

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

PUMA SE
PUMA Way 1
91074 Herzogenaurach
Germany

Email: 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

We process the following data of our shareholders and, if applicable, their proxies in connection with the Annual General Meeting:

- First and last name, title;
- Address and further contact details;
- Share-related data (e.g. class of shares, type of share ownership, number of shares;
- Other data arising in connection with the Annual General Meeting (e.g. number of the admission ticket, access data for the PUMA InvestorPortal, voting behaviour, information on motions, questions or election proposals).

If shareholders or their proxies contact us, we also process the personal data that is required to respond to the respective request, such as the email address or telephone number.

When you visit the PUMA InvestorPortal on the Internet, we collect data about accesses to the PUMA InvestorPortal. The following data and device information are logged in the web server log files:

- Retrieved or requested data;
- Date and time of retrieval:
- Message whether the retrieval was successful;
- Type of web browser used;
- Referrer URL (the previously visited page);
- IP address:
- Session ID; and
- Login.

Your browser automatically transmits 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 saved there. Within the scope of the session storage technology, we collect information about the respective authentication token 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 switch to another page of the portal during an active session, return to our website or need to reload the page. In addition, we use the so-called local storage function to save the timestamp of your login, which for security reasons enables an automatic logout after 30 minutes of inactivity. When you close your browser, this data is automatically deleted. In your browser menu, you will find information on how to technically prevent web storage objects from being allowed and on the setting that allows your browser 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.

## 3. Purpose and Legal Basis of the Processing

We process your personal data for the following purposes.

#### 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 in order to be able to provide the PUMA InvestorPortal technically as well as for the detection of misuse, troubleshooting and to ensure the smooth running of the Annual General Meeting. The legal basis for the processing of the personal data contained therein is Section 25 (2) No. 2 of the Telecommunications Telemedia Data Protection Act (*TTDSG*), as this is necessary for the provision of the PUMA InvestorPortal requested by you. In this respect, we have a legitimate interest in the further processing in order to be able to provide you with the exercise of your shareholder rights in a user-friendly manner. The legal basis for this processing is Article 6 (1) f) DSGVO.

#### b) Preparation, implementation and follow-up of the Annual General Meeting

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

• to process the registration and participation of shareholders and their proxies in the Annual General Meeting (e.g. verification of identity, verification of

- entitlement to participate, preparation of the list of participants and making it available for inspection, dispatch of admission tickets) and
- to enable the shareholders and their proxies to exercise their rights within the
  framework of the Annual General Meeting (in particular the granting and
  revocation of powers of attorney and instructions to the proxies of the Company
  as well as the exercise of the rights to vote, to propose motions, to make
  statements, to speak and to receive information as well as the right to object to
  resolutions of the General Meeting in the manner described in the invitation to
  the General Meeting).

The legal basis for this processing is Art. 6 para. 1 lit. c) DSGVO in conjunction with Section 67e para. 1 AktG¹ and our obligations under stock corporation law pursuant to Sections 118 et seq. AktG.

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

In connection with the Annual General Meeting, we may also transfer your data to our legal advisors, tax advisors or auditors, as we have a legitimate interest in organizing the Annual General Meeting in accordance with the relevant legal provisions and in obtaining external advice for this purpose. The legal basis for this processing is Art. 6 para. 1 lit. f) DSGVO.

## c) Fulfilment of statutory reporting and publication obligations (in particular voting rights notifications) and other statutory obligations (in particular retention periods)

We also process personal data in order to fulfil our legal obligations, such as regulatory requirements and obligations to retain data under stock, securities, tax and commercial law. The legal basis for this processing is the aforementioned legal regulations in conjunction with Art. 6 (1) c) of the DSGVO.

## 4. Categories of Recipients of the Data

The Company's service providers, which are commissioned for the purpose of preparing, conducting and following up the Annual General Meeting, only receive personal data from the Company that is required for the performance of the commissioned service and process the data exclusively on behalf of and in accordance

<sup>&#</sup>x27;The provisions of the AktG shall apply to the Company pursuant to Art. 9 para. 1 lit. c) ii), Art. 10, Art. 53 of Council Regulation (EC) No. 2157/2001 of 8 October 2001 on the Statute for a European company (SE), unless otherwise provided for in specific provisions of the SE Regulation.

with 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 this data confidentially.

In connection with the conduct of the Annual General Meeting, your personal data may, under certain circumstances, be disclosed to other duly registered shareholders or their proxies (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 Annual General Meeting).

Finally, we may be required to disclose your personal data to additional recipients, such as when publishing notifications of voting rights in accordance with the provisions of the German Securities Trading Act, or to authorities for the purpose of fulfilling legal notification obligations (e.g. to financial or law enforcement authorities).

Your data will generally be processed in countries that belong to the European Union (EU) and the European Economic Area (EEA). If shareholders come from countries outside the EU or the EEA (third countries), we will also send information to these shareholders (e.g. invitations to general meetings). If these communications also contain personal data (e.g. motions for general meetings with names), this data will also be transmitted to third countries. In third countries, the provisions of the GDPR do not apply directly. Insofar as there is no adequacy decision by the EU Commission, a lower level of protection for your personal data may exist in these third countries. A transfer is nevertheless necessary in order to inform all shareholders equally, as we may not exempt shareholders from third countries from our duty to inform. With the transfer, we therefore fulfil our contractual obligations. The legal basis for the transfer is Art. 49 (1) b) DSGVO.

#### 5. Data Sources

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

If you are acting as a proxy for a shareholder, we will receive your personal data from the shareholder who granted you the proxy and directly from you if your conduct at the Annual General Meeting is affected.

#### 6. Storage Period

As a matter of principle, we anonymize or delete personal data if it is no longer required for the above-mentioned purposes and does not conflict with statutory proof and retention requirements (e.g. according to 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 storing personal data, for example in the event of disputes in or out of court on the occasion of the Annual General Meeting, the data may be stored for a longer period of time. However, the personal data will then be deleted.

## 7. Data Subject Rights

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

- the right to obtain information about the data processing and a copy of the processed data (right to information, Art. 15 DSGVO)
- the right to request the correction of inaccurate data or the completion of incomplete data (right to rectification, Art. 16 DSGVO),
- the right to request the immediate deletion of personal data (right to erasure, Art. 17 DSGVO).
- the right to request the restriction of data processing (right to restriction of processing, Art. 18 DSGVO)
- the right to receive the personal data concerning you that you have provided to a controller in a structured, commonly used and machine-readable format, and also to transmit this data to another controller without hindrance from the controller (right to data portability, Art. 20 DSGVO)

Insofar as we process your data to protect the legitimate interests of PUMA SE or a third party, you have the right to object to the processing of personal data relating to you at any time on grounds relating to your particular situation (right to object, Art. 21 DSGVO). Data processing will then cease unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or where the processing serves the purpose of asserting, exercising or defending legal claims.

Irrespective of this, every shareholder and every authorized representative has the right to lodge a complaint with a data protection supervisory authority pursuant to Article 77 of the GDPR.

**PUMA SE** 

The Management Board