

# Data Protection Declaration for the AGM Internet Service of Telefónica Deutschland Holding AG

## I. General Information

At this point we inform you about the processing of personal data during your visit to our website. However, this information does not apply to websites of other companies, even if a link to this or another website of our company has been set there. The notices do not have a regulatory character, they are only for your information.

You can find out what other personal data we process at the Annual General Meeting in our [Data Protection Information Leaflet](#).

Personal data is any information relating to an identified or identifiable natural person (hereinafter "data subject").

### 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. 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. We inform you on how to revoke your consent when asking for consent. Alternatively, 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 notice.

Moreover, you have the right to file a complaint with a supervisory body (Art. 77 DSGVO) You may also contact the Data Protection Supervisory Body.

#### **4. Your Right to Object (Art. 21 GDPR)**

**You have the right to object at any time, on grounds relating to your particular situation, to the processing of your personal data based on Article 6(1)(e) DSGVO or Article 6(1)(f) DSGVO; this also applies to profiling based on these provisions. 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 serves to assert, exercise or defend legal claims.**

**If we process your personal data for the purpose of direct marketing, you have the right to object at any time to the processing of such personal data for the purpose of such marketing; this also applies to profiling, insofar as it is related to such direct marketing. We will then no longer process your personal data for this purpose.**

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

#### **5. Location of Data Processing**

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.

Employees of our company and service providers who assist us with data processing as part of contract processing (service providers for IT operations such as the online portal "Internet Service for the Annual General Meeting") have access to your personal data to the extent necessary to fulfill the purposes stated below. In individual cases, we are legally obliged to transmit personal data to authorities (e.g. requests for information from investigating authorities) or natural persons/legal entities (e.g. to assert claims).

#### **6. Hyperlinks to Websites of other Providers**

We have set links on our website to websites of other providers. We are not responsible for the data processing on these websites. For information on how the respective providers handle data protection, please refer to their data protection provisions.

#### **7. Alteration of the Data Protection Declaration**

This data protection declaration can be accessed and printed out at any time under the link "[Data protection declaration for the AGM Internet Service](#)". Since changes in the law or changes in our

internal business processes may make it necessary to adapt this data protection declaration, which we reserve the right to do accordingly, this data protection declaration can be retrieved regularly.

## **II. Visit to our Website**

In the following, we would like to inform you which personal data we process during your visit to our website.

At various points on our website, you have the opportunity to enter your personal data (e.g. in the form for registering to receive e-mails). Without providing the requested information for a requested service (e.g. e-mail registration), we will not be able to provide it to you.

### **1. Provision of Service/Display Website**

When you access our website, the processing of the following data is necessary to display the website with all its intended functions: The requested website URL, the website from which the URL was requested, the date and time of the visit to the website, the type and version of the browser used, the language used, your IP address, the type of request, the port through which the request was sent, the processing information and status of the web server, a generated error code if applicable, and the duration of the request.

We process this data for the purpose of providing our service (Art. 6 para. 1 b) DSGVO). This data is processed for this purpose, but not stored - unless different storage periods are specified below.

### **2. Logfiles**

When our website is visited, the following data is logged in a file (log file), unless there is information to the contrary elsewhere in this data protection declaration: The requested website URL, the website from which the URL was requested, the date and time of the website call, the type and version of the browser used, the language used, your IP address, the type of request, the port through which the request was sent, the processing information and status of the web server, a generated error code if applicable, and the duration of the request. We process this data to identify and eliminate technical faults and to improve the quality of our services (Art. 6 para. 1 f) DSGVO).

The personal data processed in connection with the use of the Investor Portal will be deleted with regard to the authentication token, the session data as well as the login timestamp immediately after the closure of the shareholder portal. The other personal data will be retained for 32 days. However, in the event of a violation of legal rights or in a corresponding case of suspicion, the log files concerned may be retained in individual cases until the matter has been clarified and, if necessary, for further prosecution (e.g. in the case of criminal offences such as fraud). This applies accordingly to cases of errors and malfunctions until they have been rectified.

### **3. InvestorPortal**

You can log in to our AGM internet service "InvestorPortal" using your individual access data you received as a shareholder with the invitation documents to the Annual General Meeting. You can use this InvestorPortal to access personal services such as issuing and managing powers of attorney and instructions to proxies. We process the data you provide for the organization as well as preparation and implementation of the Annual General Meeting (Art. 6 (1) c) DSGVO).

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).

Each login to the InvestorPortal is logged (login data entered, time of calling up, successful or unsuccessful login; before using individual services, knowledge and acceptance of the respective terms of use is logged). The logging serves to identify and eliminate technical faults and, if there are concrete indications, also for the purpose of detecting and preventing misuse and, with regard to the acceptance of the terms of use, to provide evidence (Art. 6 (1) f) DSGVO).

Data on the personal services used in the InvestorPortal and the associated login data will be deleted after the Annual General Meeting if you request deletion and there are no legal objections to your request. The data that can be accessed in the InvestorPortal will be processed and deleted in accordance with the conditions of participation (sections 121 et seq. AktG and sections 23 and 25 of the Articles of Association) in the Annual General Meeting. The logs for calling up the InvestorPortal will be deleted no later than 32 days after the Annual General Meeting has been held, unless they are needed for a longer period for troubleshooting or detecting/preventing misuse - in this case, the logs will be retained in the individual case until the matter has been clarified and, if necessary, for further proceedings.

Information on whether and how your vote was counted can be requested up to 30 days after the Annual General Meeting by sending an email to [IR-Deutschland@telefonica.com](mailto:IR-Deutschland@telefonica.com), stating the shareholder number (or the shareholder numbers represented by proxy).

#### **4. E-Mail Distribution**

If you choose to receive information by e-mail in accordance with Section 49 of the German Securities Trading Act (WpHG), we will process your e-mail address in order to send you the Annual General Meeting documents by e-mail in the future as requested (Art. 6 (1) f) of the German Data Protection Regulation (DSGVO)) and to inform you by e-mail about future corporate events, insofar as we are legally obliged to do so (Art. 6 (1) c) of the German Data Protection Regulation (DSGVO). If you no longer wish to receive e-mails, you can unsubscribe via [IR-Deutschland@telefonica.com](mailto:IR-Deutschland@telefonica.com) or via your shareholder account until the end of the Annual General Meeting. We will delete your e-mail address immediately after unsubscribing.

#### **5. Cookies**

We use a so-called technically necessary cookie on our website, which is mandatory for the smooth functioning of our website (§ 25 para. 2 Nr. 2 TTDSG). The cookie is deleted when you leave our website. You have the option to configure the setting of cookies at any time. For example, you can set your browser to inform you about the setting of cookies in advance or to refuse cookies completely.

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