



**Information on data protection pursuant to Article 13, 14 GDPR
regarding the processing of personal data
for purposes of the General Meeting**

This notice will inform you about the processing of your personal data by ATOSS Software SE, Rosenheimer Str. 141 h, 81671 Munich, (hereinafter also referred to as “we” or “ATOSS”) and the rights to which you are entitled under data protection law.

1. Who is responsible for the data processing?

The controller of the data processing is ATOSS Software SE, Rosenheimer Str. 141 h, 81671 Munich, email: hauptversammlung@atoss.com, telephone: +49 89 4 27 71 0.

You can reach the data protection officer of ATOSS Software SE at

ATOSS Software SE
Dr Stefanie Hagemeyer
Rosenheimer Str. 141 h
81671 Munich
Germany
Email: datenschutz@atoss.com

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

ATOSS processes your personal data (particularly the name, address, and other contact details of the shareholder, number of shares, type of share ownership, admission card number, and admission card data) in connection with the General Meeting under the provisions of the General Data Protection Regulation (GDPR), the German Federal Data Protection Act (BDSG), the German Stock Corporation Act (AktG) and all other relevant legal provisions. This is done only for the purposes provided for in the German Stock Corporation Act. This includes communicating with shareholders and handling General Meetings. In detail:

The company processes data that shareholders provide when they register for the General Meeting or transmit to the company by their custodian banks for that reason. Under Section 135 (5) sentence 2 AktG, a shareholder may authorise a credit institution, another intermediary or shareholders' associations equivalent to an intermediary under Section 135 (8) AktG, voting advisors, or persons who undertake to exercise shareholders' voting rights commercially in the General Meeting to represent that shareholder in the General Meeting and to have their voting right exercised in the name of the relevant person. In this case, only the personal data of the representative will be processed.

We process your personal data for the purpose of handling shareholder registration and participation in the General Meeting (to check eligibility, for example) and to enable shareholders to exercise their rights in the General Meeting (including granting, revoking, and verifying powers of attorney and instructions). Unless you provide the relevant data, you cannot participate in the General Meeting or exercise your voting rights or other meeting-related rights.

This includes the following processing operations:

When registering a shareholder for the General Meeting, ATOSS Software SE processes the necessary data provided by the shareholder or transmitted for this purpose by the shareholder's custodian bank (in particular first and last names, place of residence or address, number of shares, class of shares, admission card number, and type of ownership).

Insofar as participation in the General Meeting is by a proxy, we process the personal data of the shareholder specified in the granting of power of attorney as well as the first and last names and place of residence or address of the proxy. In the event that power of attorney is granted and instructions are issued to the proxies appointed by ATOSS, the instructions issued will also be processed and the power of attorney statement recorded by the Company in a verifiable manner for a period of three years.

Pursuant to Section 129 AktG, a list of participants with the following personal data will be kept during the General Meeting: number of the admission card, first name, last name, and place of residence of the represented shareholder or their proxy and of the Company's proxy, number of shares, class of shares, number of voting rights, and type of ownership.

Insofar as a shareholder requests that items be placed on the agenda, ATOSS Software SE will announce these items, stating the name of the shareholder if the prerequisites are met under company law provisions. Similarly, ATOSS Software SE will make countermotions and election proposals by shareholders accessible on the ATOSS Software SE website if the prerequisites are met under company law provisions, stating the name of the shareholder (Sections 122 (2), 126 (1), 127 AktG).

Each data processing operation described above is legally based on Section 67e AktG in conjunction with Article 6 (1)(c) GDPR.

Beyond that, your personal data may also be processed to comply with other legal obligations (such as regulatory requirements) as well as company, commercial, and tax law retention obligations. The legal basis for the processing is the respective legal regulations in conjunction with Article 6 (1) lit. c) GDPR.

If we intend to process your personal data for another purpose, you will be informed in advance within the scope of the statutory provisions.

3. To which categories of recipients will your data be forwarded, if any?

What follows will inform you about the categories of recipients to whom we pass on your personal data:

External service providers: To organise the General Meeting, we use external service providers who process your personal data according to our instructions in compliance with Article 28 GDPR.

Shareholders and third parties: Within the bounds of the statutory right to inspect the list of participants in the General Meeting, shareholders may inspect the data recorded in the list of participants on request for up to two years after the meeting. The list of participants will also be made available to the shareholders present at the General Meeting. Your personal data will also be published in accordance with the statutory provisions as part of motions for additions to the agenda, countermotions, or election proposals that require publication.

Other recipients: Within the scope of legal regulations, we may be obligated to transmit your personal data to further recipients, such as authorities and courts.

4. How long will your personal data be stored?

As a general principle, we erase or anonymise your personal data as soon and insofar as the data is no longer required for the purposes stated above, unless we are obligated to continue storing it under statutory obligations to provide proof or retain data (including under the German Stock Corporation Act, the German Commercial Code, the German Fiscal Code, or other legal

provisions). Data related to General Meetings is normally erased or anonymised after three years. As soon as we have become aware of the sale of your shares, we will only store your personal data for a maximum of twelve months, subject to other statutory provisions. Beyond this, we will store your personal data only insofar as further processing is necessary in individual cases connected with claims asserted by or against us (statutory limitation period of up to 30 years).

5. Do we transfer personal data outside Europe?

We do not intend to transfer personal data to a third country.

6. Does automated decision-making take place in individual cases (including profiling)?

We do not use purely automated individual decision-making procedures pursuant to Article 22 GDPR or profiling.

7. What rights do you have?

Insofar as we process personal data concerning you, you have the following rights regarding the processing of your personal data within the bounds of the legal requirements:

- Right of access to the data concerning you that is being stored by ATOSS Software SE (Article 15 GDPR);
- Right to rectification of incorrect data concerning you that is being stored (Article 16 GDPR);
- Right to have your data erased, particularly if it is no longer necessary for the purposes for which it was originally collected (Article 17 GDPR);
- Right to restriction of processing (blocking), particularly if the processing of your data is unlawful or you dispute the accuracy of your data (Article 18 GDPR);
- Right to object to the processing of your data insofar as the processing is carried out solely for the purposes of safeguarding the legitimate interests of the company (Article 21 GDPR);
- Right to lodge a complaint: For complaints about the processing of your personal data, please contact our data protection officer using the contact details provided. Irrespective of this, you have the right to lodge a complaint with the competent data protection authority.