

Eleving^{GROUP}

Eleving Group

Société Anonyme

Registered office: 8-10 Avenue de la Gare

L-1610 Luxembourg

Grand Duchy of Luxembourg

R.C.S. Luxembourg: B174457

DATA PROTECTION NOTICE

The following information shall provide an overview on the kind of Personal Data we collect, how we use it, for which purposes we use it, with whom we share it and which rights you have regarding the processing of your Personal Data.

1. Purposes of the Processing

Information relating to an identified or identifiable natural person (“**Personal Data**”) is processed exclusively in accordance with the European Data Protection Regulation (“**GDPR**”), the applicable Luxembourg data protection laws, as amended from time to time, the Luxembourg Law of 10 August 1915 on Commercial Companies, as amended (*loi modifiée du 10 août 1915 concernant les sociétés commerciales*, “**LSC**”), and all other applicable statutes.

- 1.1** We process your Personal Data for the purpose of holding the Annual General Meeting (“**AGM**”). In order to enable you to participate in and vote at the AGM, we process the number of shares you hold at the relevant record date according to the record date confirmation issued by your depository bank that is safekeeping your shares. Additionally, we process Personal Data concerning your attendance at the AGM. This includes, for example, your name, address, email address and phone number, if you will attend the AGM in person or if you will be represented by a proxyholder in relation to such proxyholder, and, if applicable, the voting instructions you provided to your proxyholder. The legal basis for this processing is Art. 6 (1)(c) of the GDPR (processing is necessary for compliance with a legal obligation applicable to us) in connection with Art. 5 (3) and Art. 9 of the Luxembourg law of 24 May 2011 on the exercise of certain rights of shareholders in general meetings of listed companies, as amended, and Art. 450-1 (2) LSC.
- 1.2** Moreover, the above-mentioned Personal Data as well as your voting decisions will be processed in order to publish the attendance percentage and the voting results of our AGM. The legal basis for this processing is Art. 6 (1)(c) of the GDPR (processing is necessary for compliance with a legal obligation applicable to us) in connection with Art. 11 of the Luxembourg law of 24 May 2011 on the exercise of certain rights of shareholders in general meetings of listed companies, as amended.
- 1.3** In some cases, we may be legally obliged to process additional Personal Data, notably in connection with any laws applicable to issuers whose securities are listed on a regulated market. However, we will contact you prior to processing your Personal Data for any purpose not listed above.

2. Disclosure of Personal Data

- 2.1** We ensure that your Personal Data is only processed in accordance with the applicable data protection laws. Therefore, your Personal Data will be disclosed only insofar as reasonably necessary for the purposes set out in this Data Protection Notice. Your Personal Data may be disclosed to authorities in Luxembourg, and to our auditors and legal advisors, any Luxembourg notary and/or corporate service providers for the purposes of holding and organizing the AGM. The legal basis for this processing is Art. 6 (1)(c) of the GDPR in connection with Art. 11 of the Luxembourg law of 24 May 2011 on the exercise of certain rights of shareholders in general meetings of listed companies, as amended, and based on our legitimate interests to obtain consultancy in organizing and conducting the AGM (Art. 6 (1)(f) of the GDPR).
- 2.2** If any of these parties are located outside the EU / EEA, we will share your Personal Data in accordance with the requirements set in the applicable personal data protection legal norms, including (a) by entering into EU standard contractual clauses, (b) by using other appropriate grounds for data transfer provided by applicable legal norms or (c) cooperating with service providers located in country, which offers an adequate level of data protection in accordance with an adequacy decision adopted by the European Commission pursuant to Article 45 of the GDPR.

3. Retention Periods

Your Personal Data will be retained only for as long as necessary for the purposes for which we have collected it and as long as required by statutory retention provisions and will be deleted or anonymized afterwards. Insofar as we are subject to legal accountability obligations, your Personal Data affected by these accountability obligations will be retained for 10 years.

4. Obligation for the Provision of Personal Data

As a shareholder of Eleving Group you are legally required to provide us the Personal Data set out above.

5. Your Rights

Depending on the specifics of the case, you may be entitled to exercise some or all of the following rights. You may:

- require confirmation as to whether or not Personal Data concerning you is processed by us, and where that is the case, require access to the Personal Data retained and additional information via a copy that is provided free of charge;
- request proper rectification, erasure or restriction of your Personal Data, e.g. because it is incomplete or inaccurate, it is no longer needed for the purposes for which it was collected, or you have taken advantage of an existing right to object to the data processing; in case the Personal Data is processed by third parties, your request for rectification, erasure or restriction will be forwarded also to such third parties unless this proves impossible or involves disproportionate effort;
- take legal actions in relation to any potential breach of your rights regarding the processing of your Personal Data, as well as to lodge complaints before the competent Data Protection Regulators;
- require not to be subject to any automated decision making, including profiling (automatic decisions based on data processing by automatic means, for the purpose of assessing several personal aspects) which produce legal effects on you or affects you with similar significance;

- object to the processing of Personal Data, which is processed based on our legitimate interests. In the event of such an objection, we will no longer process your Personal Data, unless we will demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defense of legal claims.

To exercise these rights, please contact us using the e-mail address indicated below. We will process this request within 30 days and provide an answer.

Additionally, you have the right to file a complaint to the data protection supervisory authority if you believe that we have violated your data subject's rights.

6. Contact details

Please submit any questions, concerns or comments you have about this Data Protection Notice or any requests concerning your Personal Data by email to dpo@eleving.com.