

Information on data privacy protection according to Art 13 and Art 14 DSGVO

Kapsch TrafficCom AG (hereinafter referred to as "**Kapsch**" or "**we**") uses various automation-supported systems to enable participation in the Annual General Meeting and the exercise of shareholder rights in connection with the Annual General Meeting. Personal data received in this context will always be processed in compliance with the European General Data Protection Regulation ("Datenschutz-Grundverordnung", DSGVO), the Austrian Data Protection Act 2018 and the Austrian Stock Corporation Act (AktG) as well as any other relevant legal provisions.

The following information describes how we process your personal data in connection with the organization of the Annual General Meeting of Kapsch.

1. Data processing

1.1. Purpose of data processing

The processing of personal data in connection with the organization of Annual General Meetings is carried out in detail for the following purposes:

Organization of participation in the Annual General Meeting by creating a subscriber directory with all participants (shareholders, proxies and guests),

- > Verification of the right to participate as a holder of bearer shares or proxy of a shareholder,
- > Processing of registration for the Annual General Meeting (creation of a registration list),
- > Documentation of the granting and revocation of powers of attorney (creation of a list of proxies),
- > Exercise of shareholder rights at the Annual General Meeting
- > Drawing up the minutes of the Annual General Meeting,
- > Recognition of the voting behavior and documentation of the voting result.
- > Fulfilment of compliance obligations, including recording, information and reporting obligations.

Shareholders who wish to attend the Annual General Meeting and exercise shareholder rights must provide the company with evidence of their ownership of shares on the record date. There is an obligation to provide evidence of the shareholding in bearer shares by means of a confirmation from the custodian bank (deposit confirmation). The entitlement to attend the Annual General Meeting and to exercise voting rights and the other shareholder rights to be asserted at the Annual General Meeting depends on the share ownership at the time of the deposit confirmation. We therefore process your data from the deposit confirmation as proof of the share ownership necessary to attend the Annual General Meeting and to enable you to exercise your shareholder rights.

1.2. Scope of data processing

Data from the deposit confirmation. From the deposit confirmation, to be issued by the custodian bank, we process the following data: Name, company, address, date of birth, registered office, company register number, issuer of the deposit confirmation, number of the securities account, the number and, if applicable, the nominal value of the shares; the class or international securities identification number; the time or period the deposit confirmation refers to.

If you do not provide the data on the deposit confirmation, we cannot check your ownership of shares. This would mean that you would not be allowed to attend the Annual General Meeting and that you might not be granted other shareholder rights.

Data for admission to the Annual General Meeting. Upon entry to the Annual General Meeting, we collect your ID data (ID number, type of ID and issuing authority) for identification as a participant, as well as the number of the voting card, in the event that you participate as a shareholder or his or her proxy.

To verify your identity at the entrance to the General Meeting, an official photo ID of each participant (driving license, passport, ID card) must be presented; ID number, type of ID and issuing authority will be recorded by us.

Data of the proxies. Every shareholder, entitled to attend the Annual General Meeting, has the right to appoint a natural or legal person as proxy. We must also process the data of this proxy (including his ID data) accordingly. In the event that you are represented at the Annual General Meeting, we will collect the data of your proxy, namely his name, address, company register number, date of birth, scope of the power of attorney and ID data.

Data for the submission of agenda items or proposed resolutions. If a shareholder requests that items shall be put on the agenda (Section 109 AktG) or proposed resolutions shall be taken (Section 110 AktG), we will publish these items on Kapsch's website, stating the name of the shareholder and the shareholding, if the conditions of the Austrian Stock Corporation Act (AktG) are fulfilled.

1.3. Legal basis for data processing

The legal basis for the processing of the data from the deposit confirmation is Section 10a AktG in conjunction with Art 6 para 1 lit c DSGVO, the processing to comply with legal obligations of a listed stock corporation in Austria with bearer shares. Furthermore, the processing and transmission of data serves the fulfilment of certain statutory reporting and documentation obligations (in conjunction with Art 6 para 1 lit c DSGVO).

1.4. Duration of data storage

We process your data as long as you are a bearer shareholder and beyond, as long as there are legal storage obligations or for the period during which claims can be asserted against us (legal limitation period of three to thirty years).

1.5. Recipient of data

Your data will be passed on to the following third parties, in accordance with legal obligations:

- > The Commercial Register at the Commercial Court of Vienna;
- > The Vienna Stock Exchange (on occasion);
- > The Financial Market Authority (on occasion) ;
- > The Austrian Control Bank (on occasion).

We will also transmit your data to a notary who is appointed by us to document the proceedings of the Annual General Meeting for the commercial register.

All participants with a right to attend are entitled to examine directory of participants on site. Due to legal obligations, the directory of participants will also be included in the minutes of the Annual General Meeting, which must be filed in the publicly available collection of documents with the commercial register of the Vienna Commercial Court.

To the extent required by law, we also publish certain data on our website www.kapsch.net/ktc.

No Data will be passed on to further third parties, for their own purposes, without your consent.

We use Kapsch BusinessCom AG as IT service provider to store and host personal data in accordance with the assigned IT services. This company may have access to personal data within the scope and in accordance with our instructions.

In addition, we have engaged a Service company, specialized on the organization of Annual General Meetings, for the administration of the deposit confirmations and the registrations for the Annual General Meeting, the handling of admission control and the recording of votes, which must, if need be, also have access to the data on our behalf.

2. Rights of the data subject

You have the right of access to all your personal data, together with supplementary information such as the purposes of processing and the recipients, the criteria for determining the period of storage, your right to cancellation and correction, to restriction or objection, your right of appeal, information on the origin of the data, and information on automated decision-making including the logic involved.

You may request the correction or completion of incorrect or incomplete data. In certain circumstances, for example when the accuracy of data is in dispute until the accuracy has been verified, you may request a restriction on the processing of data in such a way that it may only be processed with your consent or in order to assert, exercise or defend legal claims or to protect the rights of another natural or legal person or on grounds of an important public interest.

You may request Kapsch to send to you, or - if technically feasible – to a third party of your choice, a copy of your personal data in a structured, common and machine-readable format (right to data transferability). You have the right to have your personal data deleted in certain circumstances, such as when it is not processed in accordance with data protection requirements.

In principle, you have the right to object at any time, for reasons arising from your particular situation, the processing of your personal data under Article 6(1)(e) or (f) DSGVO; which would also apply to profiling based on these provisions. In this case, we will no longer process your personal data, unless we can prove compelling grounds for processing that outweigh your interests, or the processing serves to assert, exercise or defend legal claims. However, since your personal data is processed on the basis of Art 6 para 1 lit a and Art 6 para 1 lit c DSGVO, this right is currently not relevant.

Requests for information, correction, restriction of processing, objection, data transmission or deletion must be addressed in writing to Kapsch TrafficCom AG, Am Europlatz 2, 1120 Vienna, or by e-mail to datenschutz@kapsch.net.

3. Supervisory body

Notwithstanding the possibility to file a legal action before the State Court (Landesgericht) pursuant to § 29 (2) of the Data Protection Act 2018, and any other legal remedies, you have the right of appeal to the national supervisory body of your place of residence, if unlawful processing of personal data is assumed. The Austrian Data Protection Authority is the competent supervisory body in Austria.

4. Person responsible and data protection officer

The person responsible for processing your personal data is Kapsch TrafficCom AG, FN 223805a, Am Europlatz 2, 1120 Vienna.

Data protection officer of the person responsible is Mr. Günter Wildmann, p. A. Kapsch TrafficCom AG, e-mail: datenschutz@kapsch.net.