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## Annual General Meeting June 6, 2024

Privacy notice for shareholders  
and their representatives



## Privacy notice

The following information is intended to give you an overview of the processing of your personal data as a shareholder of DWS Group GmbH & Co. KGaA (including any representatives you designate) as well as the rights to which you are entitled under data protection law.

### Who is responsible for data processing and whom can I contact?

The controller responsible for data processing is:

DWS Group GmbH & Co. KGaA  
Mainzer Landstr. 11-17  
60329 Frankfurt am Main, Germany  
Telephone: +49 69 910-12371  
Fax: +49 69 910-19090  
E-mail: [info@dws.com](mailto:info@dws.com)

Our company data protection officer can be contacted at:

DWS Group GmbH & Co. KGaA  
Data Protection Officer  
Mainzer Landstr. 11-17  
60329 Frankfurt am Main, Germany  
Telephone: +49 69 910-12371  
Fax: +49 69 910-19090  
E-mail: [privacy@dws.com](mailto:privacy@dws.com).

Should you as shareholder have any data protection questions in conjunction with the General Meeting, please call the IR hotline on +49 69 910-14700.

### What personal data and sources of data do we use?

The shares of DWS Group GmbH & Co. KGaA are bearer shares. In contrast to registered shares, the current holder of the bearer shares is usually not known to DWS Group GmbH & Co. KGaA. The custodian bank at which your shares are held for safekeeping will inform you in your role as holder of bearer shares about the invite to our general meeting. The custodian bank will forward your reply to our registration office so that we can provide you with a ballot and/or carry out other instructions in accordance with your wishes.

We use the data gathered during the General Meeting to draw up lists of participants and to document the results of voting. In addition, we process votes and any proxies and, as the case may be, any questions, disagreements, statements and other input from our shareholders – as described in detail in the invite.

### Why do we process your data and what is the legal basis for doing so?

We process your personal data in compliance with the EU General Data Protection

Regulation (GDPR), the Stock Corporation Act (*Aktiengesetz*) and all other relevant laws, for example the German Federal Data Protection Act (*Bundesdatenschutzgesetz*).

The key provisions in this respect are Section 123 (2) Stock Corporation Act in conjunction with Section 22 of the Articles of Association and Section 129 (1) sentence 2 Stock Corporation Act in conjunction with point (c) of Article 6 (1) GDPR.

If you mandate us to provide services, we use data to perform our contractual obligations (point (b) of Article 6 (1) GDPR).

In addition, where necessary we process personal data to meet additional legal obligations such as regulatory requirements and retention obligations in conjunction with point (c) of Article 6 (1) GDPR.

In individual cases we also process your data for the purposes of the legitimate interests pursued by us, in accordance with point (f) of Article 6 (1) GDPR.

Should we wish to process your personal data for purposes other than those specified above, we will involve you in this decision pursuant to the statutory provisions.

The purpose of the data processing is to organize, hold and follow up on the General Meeting.

This data processing does not involve fully automated decision-making in accordance with Article 22 GDPR.

Shareholders may appoint an authorized representative and have the ballot sent to the postal address provided by the shareholder. We use this data for the sole purpose of carrying out that instruction and conducting the General Meeting.

### **Which categories of recipient do we disclose your data to and who receives access?**

We use external service providers to conduct the General Meeting. These service providers are engaged as processors in accordance with Article 28 GDPR and process your personal data solely on the basis of instructions given by DWS Group GmbH & Co. KGaA.

In addition, we may disclose your personal data to other recipients, such as regulatory authorities to meet statutory reporting obligations (for example the German Federal Financial Supervisory Authority (BaFin) when a statutory voting rights threshold is exceeded).

Pursuant to Section 129 (4) Stock Corporation Act in conjunction with Section 278 (3) Stock Corporation Act, where applicable, other shareholders of DWS Group GmbH & Co. KGaA, their representatives, the members of the Executive Board of the General Partner and of the Supervisory Board, the Chairperson of the General Meeting, the company proxies, the notary public and, where applicable, the auditors can view your personal data included in the list of participants.

Within DWS Group GmbH & Co. KGaA, your data can be accessed by persons who need to do so in order to meet our obligations to you.

### How long do we store your data?

We generally delete your personal data once it is no longer needed for the purposes specified above, provided we are not required to retain such data for a longer period based on statutory obligations to produce documentary evidence or retain records (for example pursuant to the Stock Corporation Act, the German Commercial Code (*Handelsgesetzbuch*), the German Fiscal Code (*Abgabenordnung*), the German Securities Trading Act (*Wertpapierhandelsgesetz*) or the German Banking Act (*Kreditwesengesetz*)). The data collected in relation to the General Meeting is usually stored for a period of three years.

### What are your rights as shareholder/representative?

You have the right

- of access in accordance with Article 15 GDPR,
  - to rectification of inaccurate personal data in accordance with Article 16 GDPR,
  - to erasure of your personal data in accordance with Article 17 GDPR, to the extent there is no legal basis for further retention,
  - to restriction of processing in accordance with Article 18 GDPR. In other words, although your personal data will continue to be stored it may only continue to be processed under restricted conditions,
  - to data portability in accordance with Article 20 GDPR in relation to all data that you have provided to us. In this case we will provide you with the personal data in a structured, commonly used and machine-readable format,
- to object to data processing in accordance with Article 21 GDPR on grounds relating to your particular situation.

### Do you wish to exercise your right to file a complaint?

You may contact the Data Protection Officer of DWS Group GmbH & Co. KGaA specified above or a data protection supervisory authority if you believe that your personal data is being processed in violation of the GDPR or the Federal Data Protection Act. We are under the jurisdiction of the following data protection supervisory authority:

Der Hessische Beauftragte für Datenschutz und Informationsfreiheit

Postfach 3163

65021 Wiesbaden, Germany

Telephone: +49 6111408-0

Fax: +49 6111408-611

E-mail address available from: <https://datenschutz.hessen.de/über-uns/kontakt>