



ANNUAL GENERAL MEETING

June 5, 2019

Notes on data protection



Notes on data protection

The information we provide in the following 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 you are entitled to 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 Landstraße 11–17
60329 Frankfurt am Main
Germany
Telephone: +49 69 910-12371
Fax: +49 69 910-19090
E-mail: info@dws.com

You can contact our Data Privacy Officer who can be reached at:

DWS Group GmbH & Co. KGaA
Data Protection Officer
Mainzer Landstraße 11–17
60329 Frankfurt am Main
Germany
Telephone: +49 69 910-12371
Telefax: +49 69 910-19090
E-mail: privacy@dws.com

In case you have questions about data privacy related to the General Meeting, please call the AGM hotline at +49 69 910-14700.

What personal data and data sources do we use?

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 responsible for the safekeeping of the bearer shares requests an invite on your behalf in your role as holder of bearer shares, which will be forwarded to you. The custodian will, on the other hand, forward your reply to the central collection point so that you will receive a ticket for admission as requested and your instructions will be complied with respectively.

We use the data gathered during the General Meeting to create lists of attendees and document voting results.

Why do we process your data and on what legal basis do we do so?

We process your personal data in compliance with the EU General Data Protection Regulation (GDPR), the German Stock Corporation Act and all other relevant legal provisions, including the German Federal Data Protection Act (BDSG). The key provisions here are § 123 para. 2 German Stock Corporation Act in conjunction with Article 22 of the Articles of Association and § 129 para. 1 sentence 2 German Stock Corporation Act in conjunction with Article 6 para. 1 letter c) General Data Protection Regulation.

If you mandate us to provide services, we use data to perform our contractual obligations (Article 6 para. 1 letter b) General Data Protection Regulation.

In addition, where necessary we process personal data to meet additional statutory requirements such as regulatory requirements and record retention obligations in conjunction with Article 6 para. 1 letter c) General Data Protection Regulation.

In individual cases, we also process your personal data to safeguard our legitimate interests pursuant to Article 6 para. 1 letter f) General Data Protection Regulation. 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 the administration and technical management of the share register as well as the preparation, execution and post-processing of the General Meeting. This data processing does not involve fully automated decision-making as defined by Article 22 General Data Protection Regulation.

The shareholder may designate an authorized representative / an accompanying guest and have admission card sent to the postal address provided by the shareholder. We use this data only to carry out this instruction and to conduct the General Meeting.

Which categories of recipients do you disclose data to and who receives access?

We use external service providers for the execution of the General Meeting. These service providers are engaged as data processors as defined by Article 28 General Data Protection Regulation and process your personal data exclusively based on the instructions of DWS Group GmbH & Co. KGaA.

In addition, we may send your personal data to other recipients, such as to regulatory authorities in order to meet statutory reporting obligations (e.g., to the German Federal Financial Supervisory Authority (BaFin) when a voting right threshold subject to reporting is exceeded).

If you participate in the General Meeting, other DWS Group shareholders, their representatives, members of the Management Board and Supervisory Board, the Chair of the General Meeting, the Notary Public and, where applicable, auditors may view your personal data included in the list of participants pursuant to § 129 para.4 sentence 1 German Stock Corporation Act.

Within DWS Group GmbH & Co. KGaA, the people who are able to access your data are those 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 (e.g., pursuant to the German Stock Corporation Act, German Commercial Code, German Tax Code, German Securities Trading Act or German Banking Act). The data collected in relation to the General Meeting is usually stored for a period of three years.

What are your rights as a shareholder/representative?

According to

- Article 15 General Data Protection Regulation, you have the right to information,
- Article 16 General Data Protection Regulation, you have the right to have incorrect data rectified,
- Article 17 General Data Protection Regulation, you have the right to have your data erased, provided there is no legal basis for its continued storage,
- Article 18 General Data Protection Regulation, you have the right to request a restriction of the processing of your personal data. This means that, although your data will continue to be stored, it may only be processed further under restricted conditions,
- Article 20 General Data Protection Regulation, you have the right to data portability with respect to any data you have provided us. In this case, we will provide you with the data in a structured, commonly used and machine-readable format,
- Article 21 General Data Protection Regulation, you have the right to object to the processing of your data if your particular situation justifies this.

Do you want to exercise your right to file a complaint?

You have the option to contact the Data Privacy Officer of DWS Group GmbH & Co. KGaA specified above or a data protection supervisory authority if you believe your personal data is being processed in violation of the General Data Protection Regulation 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: +49 611 1408-0

Telefax: +49 611 1408-611

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

Frankfurt am Main, April 2019

