

Information sheet on shareholder data protection

Information sheet based on Art 13/14 GDPR

- english translation for convenience only -

Responsible Company:
PORR AG

Executives:
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1. Content and purpose

A confidential and responsible approach to personal data is a core component of the PORR corporate culture. This is especially true regarding the personal data on our shareholders (*shareholder data*).

This info sheet on how we process shareholder data serves to clarify to shareholders how their personal data is handled as well as the rights they have under the EU General Data Protection Regulation (GDPR).

2. What information is processed by PORR on its shareholders and how are this data collected?

In the course of verifying the ownership of shares, PORR processes personal data on its shareholders. This relates to the data provided by the shareholders themselves. Other information is then generated automatically when the shareholders use the PORR systems and communicate via them, e.g. by logging into the system or sending emails. Personal data on a shareholder can also be generated and/or made available by third parties.

The following shareholder data is processed in particular:

- Personal details; including title, name, gender, date and place of birth, nationality; as well as the title, name, gender, date of birth and nationality of any proxy if applicable, etc.
- Professional and private contact data; including address, telephone and fax number, email address, etc.
- Data for authentication purposes; including copies of photo ID, data from photo ID, sample signature, photo, number of the securities account, number of shares held, class of shares if applicable, number on voting slip, etc.
- Image and audio recordings; Statements made during the video recording of the management board report at the shareholder's meeting.

3. Why does PORR need personal data on its shareholders?

As a rule, PORR needs the information requested from shareholders in order to fulfil its business purpose or to comply with legal obligations. In such cases, shareholders are obligated to make this information available.

Should the information requested not be required in order to fulfil PORR's business purpose or to comply with legal obligations, shareholders shall be informed that the information is to be provided on a voluntary basis and that it can therefore also be withheld.

4. For what purpose are shareholder data processed?

PORR processes shareholder data in accordance with the applicable data protection laws with the purpose of fulfilling its legal obligations.

Shareholder data is used for the following purposes in particular for:

- organising shareholders' meetings
- the attendance of shareholders and their representatives at shareholders' meetings
- exercising shareholder rights in the course of shareholders' meetings
- determining voting behaviour
- creating a register of registrations
- creating a register of participants
- creating a register of proxies
- producing the minutes to the shareholders' meeting
- information and communication systems, e.g. a newsletter
- investor targeting (to increase the liquidity of the share)
- fulfilling compliance obligations including those regarding subscription, information and registration obligations.
- Video recording of the management board report at the shareholders' meeting

5. Scope of processing and legal base

- Keeping records of the shareholders' meetings (validity of resolutions)



- Storage of shareholder data used to identify shareholders (§ 179 Paragraph 1 iVm Paragraph 4 of Stock Exchange Act [BörseG] 2018)
- Submission of shareholder data and the list of participants to the commercial register (§120 AktG).
- Review of the list of participants and shareholder data by authorized attendees (§ 117 AktG).
- Participation in events and receiving of information on the basis of your consent in accordance with Art 6 Paragraph 1 lit a) GDPR
- For the purpose of organizational support of the Administration, a live transmission of the audience area to the support area is carried out, enabling the prompt answering of any questions and the handling of other administrative matters as quickly as possible. There is no storage/recording of this data. Legal basis is the legitimate interest in smooth and efficient conduct of the shareholders' meeting in accordance with Art. 6 para. 1 lit. f GDPR.
- The video recording of the management board report and its publication on the companys website are based on our legitimate interest in providing transparent information to our stakeholders in accordance with Art. 6 (1) (f) GDPR.

6. To whom are shareholder data transferred?

Among the subsidiaries and companies in which PORR holds a majority stake, the only units and/or staff to receive personal data are those who need it in order to fulfil their tasks in the framework of contractual and legal obligations as well as legitimate interests. Apart from this, shareholder data is not published or disseminated within PORR.

In order to fulfil our legal obligations, PORR also transmits personal data on shareholders with the authorities. Apart from meeting our legal obligations, such as for example the shareholders' meeting and the Company Register, no other shareholder data is disclosed to the authorities.

Furthermore, the processors contracted by PORR (especially IT and back-office service providers) only receive shareholder data insofar as is necessary for achieving their purpose. In this spirit, all processors are obligated to handle the data received in confidence and only process it within the framework of the provision of services.

The transfer of shareholder data to recipients in third countries – i.e. countries outside the EU or EEA – does not occur as a rule. However, should a type of transfer of this kind be necessary in exceptional cases, the affected shareholders will be informed separately.

The video recording of the management board report will be published on the companys website.

7. How long is shareholder data stored?

PORR processes shareholder data, as far as is necessary, for the entire period of time that shares are held (from the purchase of shares to their sale) as well as to meet the legal requirements containing storage and documentation.

Furthermore, the legal statute of limitations shall be observed in regard to the storage time, especially as in certain cases the Austrian General Civil Code specifies a period that can be up to 30 years (the general statute of limitations is three years).

The Data Protection Chief Compliance Officer (DCCO) is available for shareholders who would like more detailed information on the length of time personal data is stored at PORR.

8. Data sources

Art 13 GDPR: the normal case is the collection of the data from the shareholder himself.

Art 14 GDPR: If this is not possible, the data will be collected from intermediaries who act as independent responsible persons outside the area of responsibility of PORR. If you are interested, we will be happy to provide you with further information.

9. What rights do shareholders have in respect of their personal data?

Pursuant to the specifications of Art. 15 to 22 GDPR and the preconditions laid out therein, the PORR shareholders have the right to:

- Access information on processed personal data and to be provided with a copy of the stored data ("Right of access");
- Have inaccurate personal data rectified or completed if it is incomplete ("Right to rectification");
- Obtain from the controller the erasure of personal data if it has been processed in breach of GDPR, especially if the shareholder has withdrawn his consent or expressed a legitimate objection ("Right to erasure");
- Restrict the processing of their data and to object the processing of their data in certain circumstances ("Right to restriction of processing" and "Right to object"); and
- Receive their personal data in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller ("Right to data portability").

The shareholders data are not subjected to any decision based on automated processing solely — including profiling — that could have a legal effect or significantly affect them in any other similar way.

The responsible DCO is to be consulted in order to assert these rights. Furthermore, every shareholder is entitled to make a complaint to the Austrian authority for data protection (www.dsb.gv.at).



10. Contact and further information

Email: datenschutz@porr.at

11. Key, abbreviations

Datenschutz Compliance Officer (DCO)

Data Protection Chief Compliance Officer (DCCO)

PORR Group including subsidiaries and companies in which it holds a majority stake (PORR)