



## **Data protection information for shareholders of Deutsche Lufthansa AG**

From 25 May 2018, new data protection regulations will apply in the form of the EU General Data Protection Regulation (GDPR). One of the core concerns is the transparency of data processing. We take data protection for our shareholders very seriously, and are hereby providing the following information on the processing of personal data by Deutsche Lufthansa Aktiengesellschaft, Cologne (Lufthansa), and your rights under data protection law.

### **Who is responsible for data processing?**

**The responsible party is**

**Deutsche Lufthansa Aktiengesellschaft, Cologne.**

**Address: Venloer Straße 151-153**

**50672 Cologne, Germany**

Our **data protection officer** can be contacted at:

Group Data Protection Officer

FRA CJ/D

Airportring – LAC Bldg.

60546 Frankfurt

or by e-mail at [datenschutz@dlh.de](mailto:datenschutz@dlh.de)

If you have any questions about data protection in the share register, please contact the shareholder hotline on +49(0)1802 354 354.

ADEUS Aktienregister-Service-GmbH, Munich, is responsible for managing the Lufthansa share register.

### **For what purpose and on what legal bases is your data processed? From whom / where do we receive your data?**

We process your personal data in compliance with the EU General Data Protection Regulation (GDPR), the Federal Data Protection Act (BDSG), the German Stock Corporation Act (AktG) and all other applicable laws.

Lufthansa shares are registered shares with restricted transferability. Pursuant to Section 67 AktG and the regulations of the German Aviation Compliance Documentation Act (LuftNaSiG), which is applicable to Lufthansa, the name, date of birth/incorporation, address, nationality and number of shares acquired are required to add a shareholder to the share register.

The credit institutions involved in the acquisition or custody of your Lufthansa shares regularly send us relevant information required to update the share register via Clearstream Banking Frankfurt – a subsidiary of Deutsche Börse AG – acting as our technical central depository. If you sell your shares, the credit institution informs us of the new purchaser via Clearstream.

We use your personal data for the purposes stipulated in the AktG. In particular, these include

share register management, communication with you as a shareholder, and conducting annual general meetings.

In different matters, we only use your data for purposes which are compatible with the above (in particular to prepare statistics, e.g. to demonstrate shareholder development, the number of transactions, an overview of the largest shareholders), pursuant to Article 6, para. 1 c) and para. 4 GDPR.

We may process your personal data in the context of other statutory obligations, such as regulatory requirements, stock corporation law, trade and fiscal retention requirements, in order to fulfil these obligations. In order to comply with the provisions of stock corporation law, we must ensure that data serving as proof of authorisation is verifiably recorded, for example, when authorising proxy holders nominated by the Company for the annual general meeting. The respective legal regulations (the fifth sentence of Section 134 (3) AktG in conjunction with Article 6 (1) c) GDPR and (4) GDPR) serve as the legal basis for processing in this case. In individual cases, we also process your data to safeguard our legitimate interests, pursuant to Article 6, para. 1 f) GDPR. This is the case, for example, if we have to exempt individual shareholders from information on subscription offers during capital increases due to their nationality or place of residence, in order to comply with the securities regulations of such non-European countries.

In addition, we offer you as a shareholder the possibility to subscribe to our Online Services in order for us to be able to communicate with you electronically. You can find the relevant GDPR information within section 2.3.3 of our privacy information (<https://www.lufthansagroup.com/en/service/privacy.html>).

### **To which categories of European recipients do we forward your data, if applicable?**

#### **External service providers:**

We partially use external service providers for the administration and technical management of the share register (share register service company, IT service provider) and to conduct annual general meetings (AGM service providers, service providers for printing and distributing shareholder information). These external service providers have been duly commissioned as processors.

#### **Other recipients:**

If you attend the annual general meeting, other Lufthansa shareholders may inspect the data entered in the attendee directory pursuant to Section 129 AktG at the annual general meeting. We may also disclose your personal data to other recipients, such as authorities for the fulfilment of legal notification obligations (e.g. when your specified securities trading voting rights are exceeded).

### **How long do we store your data?**

As a matter of principle, we anonymise and/or delete your personal data as soon as it is no longer required for the above-mentioned purposes and unless we are obliged by law to provide further proof of retention (e.g. in the AktG, Commercial Code, Tax Code). For data gathered as part of an annual general meeting, the standard storage time is up to three years. We must routinely retain data stored in the share register for 10 years after shares are sold. Furthermore, we only retain personal data in individual cases if this is necessary in connection with a claim asserted against Lufthansa (statutory limitation period of up to 30 years).

**What are your rights as an affected party?**

You may request to see the data stored about you in the shareholder register at [www.lufthansagroup.com/investor-relations](http://www.lufthansagroup.com/investor-relations) via the menu item Online Services for Shareholders and you can also make corrections if needed. You can also contact the Data Protection Officer by writing to the above address or by e-mail. In addition, under certain conditions, you can request the deletion of your data and a limitation of the processing thereof (e.g. if your data is unlawfully processed). You also have the right to data portability by making personal data available in electronic form.

**Right of objection:**

If your data is processed to safeguard legitimate interests, you can object to this at any time by contacting us at the address listed above, provided that your situation gives you reason to oppose the processing of your data. This data processing will then be terminated, unless the Company can prove legitimate reasons that outweigh the interests, rights and freedoms of the affected person, or insofar as the processing serves the establishment, exercise, or defence of legal claims.

**Would you like to make a complaint about how your data is handled?**

You may contact the data protection officer at the address listed above, or a data protection regulatory authority. Our responsible data protection regulatory authority is:

Der Hessische Beauftragte für Datenschutz und Informationsfreiheit  
(State Data Protection and Freedom-of-Information Authority Hessen)  
Hessen  
P.O. Box 3163  
65021 Wiesbaden, Germany  
Tel.: +49 (0)611 1408 0  
Fax: +49 (0)611 1408 900 / 901  
Email: [poststelle@datenschutz.hessen.de](mailto:poststelle@datenschutz.hessen.de)

-----  
Translation for convenience only; In case of any discrepancy or ambiguity the German version shall prevail.

Version dated: November 2019. We will notify you of any relevant changes to this information where necessary.