

## **Privacy notice to shareholders of STADA Arzneimittel AG**

Protecting your personal data and processing it in compliance with the law is a matter of high priority for us. For this reason, we would like to inform you herewith about the collection, processing and use of your personal data by STADA Arzneimittel Aktiengesellschaft (**STADA Arzneimittel AG**) and your rights under the data protection provisions set out in the General Data Protection Regulation (**GDPR**) and the German Federal Data Protection Act (*Bundesdatenschutzgesetz - BDSG*).

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

The entity responsible for processing your personal data is:

STADA Arzneimittel AG  
Stadastraße 2 - 18  
61118 Bad Vilbel  
Telephone: + 49 (0) 61 01/ 603 0  
Telefax: + 49 (0) 61 01/ 65 29 5  
Email: info@stada.de

If you have any questions on this privacy notice, you can contact the responsible data protection officer for STADA Arzneimittel AG via post or email at the following address:

Mr Denny Singh  
Data Protection Officer  
SPIE GmbH Unternehmensgruppe  
Lyoner Straße 9  
60528 Frankfurt  
Telephone: + 49 (0) 69 66 49 – 69 21  
Email: denny.singh@spie.com

### **2. What personal data do we process and where do we get them from?**

We process your following personal data:

- Personal data (e.g. first and surname, title, birth name, date of birth, gender, nationality, job/sector, address, including a history of address changes and other contact details such as your shipping address)
- Shareholder data (shareholder number, shareholder category (natural or legal person), investment date)
- Information on your shareholding (history of shares acquired and sold, including the nominal amounts, registration and transaction date, processing bank)
- Name and address of your authorized representative if applicable
- Login data for the STADA online shareholder portal

Our shares are so-called registered shares. Concerning registered shares, section 67 AktG (German Stock Corporation Act) provides that they shall be entered into the company's share register stating the name, date of birth and address of the shareholder, as well as the number of shares or share number and in the case of par-value shares the amount. As a shareholder, you are legally obliged to provide us with this information. As a rule, the credit institutions involved in the acquisition or custody of the registered shares held by you in our company

provide the relevant information for the share register on your behalf to Computershare Deutschland GmbH & Co. KG, the company maintaining the share register. The data is transferred via Clearstream Banking AG domiciled in Frankfurt, the central securities depository in charge of the technical execution of securities transactions and the custody of the shares for the credit institutions. Clearstream Banking AG also informs us about any deregistration of your shares from the share register.

Apart from the personal data stored in our company's share register, we process personal data provided by you in connection with the registration process for attending the General Meeting (e.g. your telephone number) or transferred to us by your custodian banks on your behalf for this reason.

### **3. For what purposes and on what legal basis do we process your data?**

We process your personal data in compliance with the provisions of the GDPR, the BDSG, the German Stock Corporation Act (*Aktiengesetz*, **AktG**) as well as any other relevant legal provisions.

Your personal data will be used in accordance with the purposes set forth in the German Stock Corporation Act. These purposes include the maintenance of the share register, the communication with shareholders and various processes in connection with the organization and realization of general meetings. Personal data is processed in relation to general meetings for the purpose of managing shareholders' registration for and attendance of the general meeting (e.g. checking the right of attendance, preparing the list of participants) and allowing shareholders to exercise their rights in connection with the general meeting (including the granting and revocation of proxies). The legal basis for processing your personal data in this context is the German Stock Corporation Act in conjunction with Art. 6(1) lit. c) GDPR.

In addition, we process data transferred by you or other persons who are required to notify as part of voting rights notifications in accordance with the German Securities Trading Act (*Wertpapierhandelsgesetz*). The relevant statutory provisions and Art. 6(1) lit. c) GDPR serve again as the legal basis for processing data in these cases.

In addition, your personal data may also be processed for meeting further legal obligations such as regulatory requirements as well as retention obligations under stock corporation law, commercial law and tax law. We are required, for example, to record the power of attorney granted to the proxy designated by us for the general meeting so that it can be verified and to keep and protect it against third-party access for a period of three years. The relevant legal basis in these cases is again Art. 6(1) lit. c) GDPR.

We are furthermore entitled to process your data for safeguarding our legitimate interests or the legitimate interests of a third party in accordance with Art. 6(1) lit. f) GDPR. This is, for example, the case when we prepare analyses and statistics (e.g. for describing the shareholder structure and development or the trading volumes or presenting a survey of our major shareholders) or when we have to exclude, in case of any capital increases, individual shareholders or groups of shareholders, due to their nationality or place of residence, from the provision of information on subscription offers to avoid a breach of law in specific countries. Furthermore, we have a legitimate interest when we wish to prevent or disclose illegal activities, fraud or similar threats in order to protect ourselves against any damage. Before processing your data on the basis of our legitimate interests, we will check on a case-by-case basis by way of a balancing of interests whether our interests override your interests. You can obtain further details about such a balancing of interests from our Data Protection Officer at the address specified under no. 1 above.

If we intend to process your personal data for any purpose other than those mentioned above, we will inform you of any such intention in advance in compliance with the statutory provisions and obtain your consent, if required.

#### **4. With which recipients do we share your data?**

Computershare Deutschland GmbH & Co. KG, Elsenheimerstraße 61, 80687 Munich has been commissioned with the technical maintenance of the share register of STADA Arzneimittel AG.

For managing our general meetings, we make use of external service providers, e.g. service providers for the organisation of general meetings, for printing and sending invitations to general meetings and notifications to shareholders as well as for conducting general meetings (primarily checking attendance, technical infrastructure for voting and documentation of general meetings). However, the service providers commissioned by us receive only such personal data that is required for the provision of the service requested and they process the data exclusively in accordance with our instructions.

Other shareholders and persons attending the general meeting can inspect your data contained in the list of participants during the meeting and, if applicable, during a period of up to two years thereafter.

If a shareholder demands any items to be included on the agenda, we will announce such items by indicating the name of the shareholder in accordance with the requirements under stock corporation law. We will also publish shareholders' counter-proposals and nominations on the company's website by indicating the name of the shareholder in accordance with stock corporation law provided the requirements are met.

We furthermore make use of external service providers for conducting the analyses mentioned under no. 3 above.

Finally, we may be required to transfer your personal data to further recipients, e.g. when publishing notifications of voting rights in accordance with the provisions of the German Securities Trading Act, or to authorities in compliance with statutory notification requirements (e.g. to tax or prosecuting authorities).

Your data is processed solely in the European Union.

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

We will erase or anonymize your personal data once it is no longer needed for the aforementioned purposes and we are no longer required to continue storing such data in compliance with statutory obligations of documentation and retention (e.g. under the German Stock Corporation Act, the German Commercial Code, the German Fiscal Code or other legal provisions).

The data collected in the share register is stored by us during the holding period and kept after the complete sale of all your shares on the basis of the obligations of documentation and retention under commercial and tax laws for a minimum period of ten years as a rule. In addition, we also retain data if required in relation to claims asserted by or against our company or for safeguarding our aforementioned legitimate interests.

If you have specific questions concerning the storage period, please contact our Data Protection Officer.

## 6. How do we protect your data?

We maintain appropriate technical and organisational security measures to protect your personal data against any accidental, unlawful or unauthorized destruction, loss, alteration, disclosure or use.

## 7. What rights do you have under data protection law?

Within the scope of the applicable data protection laws, you have a right of access to information concerning the personal data stored with regard to your person, including information such as the origin and categories of the data, the purposes of processing, the recipients (or categories of recipients) and the respective retention period. In addition, you may claim rectification and, in certain circumstances, erasure of your personal data. Furthermore, you may be entitled to restrict the processing of your personal data (e.g. if the processing of your data is unlawful) and to receive the data provided by you in a structured, commonly used and machine-readable format (and, where applicable, to request the transfer of such data to another controller).

### **Right to object to the processing of data for safeguarding legitimate interests**

In the event and to the extent we process your data for safeguarding legitimate interests of STADA Arzneimittel AG or a third party, you have the right to object to any such processing on specific grounds relating to your particular situation. In such case, we will cease the processing unless we can provide evidence of compelling legitimate grounds for the processing that override your interests, rights and freedoms or if the processing serves the purpose of asserting, exercising or defending legal claims.

You can assert the aforementioned rights by contacting our Data Protection Officer at the address specified under no. 1 above. Please note that there may be statutory exceptions (e.g. continuing retention obligations) that limit the exercise of your rights.

## 8. Do you have any complaints about the handling of your data?

If you have any complaint regarding the processing of your personal data, you can contact our Data Protection Officer using the contact details listed at no. 1 above to clarify the facts directly with us.

Irrespective thereof, you also have the right to lodge a complaint with a competent data protection authority. The competent authority can be found at the following link: [https://www.bfdi.bund.de/DE/Infothek/Anschriften\\_Links/anschriften\\_links-node.html](https://www.bfdi.bund.de/DE/Infothek/Anschriften_Links/anschriften_links-node.html)

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The information in this document was updated in: June 2018

In case of any relevant changes, we will provide an update of this information on our website [www.stada.com/dataprotectionnotice-shareholders](http://www.stada.com/dataprotectionnotice-shareholders). Furthermore, we will review on a case-by-case basis whether a change of this information will give rise to any obligation to provide another form of notification and we will comply with any such notification obligation accordingly.

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