



**Information on the processing of personal data  
for shareholders and shareholder representatives in connection  
with the virtual Annual General Meeting of TUI AG**



TUI AG ("we", "us", "our") takes the protection of your data very seriously. As shareholders of TUI AG (including any proxies appointed by you), we inform you below about the processing of your personal data in connection with the holding of the virtual Annual General Meeting of TUI AG and about your rights with regard to your personal data.

#### **(1) Responsible body and contact details of the data protection officer**

Controller for the processing of your personal data:

TUI AG  
Karl-Wiechert-Allee 23  
D-30625 Hannover  
Phone: +49 (0)511 566-00  
E-mail: [info@tui.com](mailto:info@tui.com)  
[www.tuigroup.com](http://www.tuigroup.com)

You can reach our data protection officer at

TUI AG  
The Data Protection Officer  
Karl-Wiechert-Allee 23  
D-30625 Hannover  
E-Mail: [Datenschutz@tui.com](mailto:Datenschutz@tui.com)

#### **(2) Personal data that we process in connection with the virtual Annual General Meeting**

In particular, we process the following categories of personal data of shareholders or their proxies in the context of the virtual Annual General Meeting of TUI AG:

- title, name, contact details (e.g. address, e-mail address and telephone number, if provided),
- date of birth,
- custodian bank,
- share-related data (e.g. number of shares, class of shares, type of ownership of shares, voting rights),
- data relating to the Annual General Meeting (e.g. shareholder number for registration in the Investor Portal, information on the exercise of voting rights),
- the content of your statement, your speech or a motion.

Any speeches are part of the virtual Annual General Meeting and will be streamed live on the Investor Portal, which can be accessed via the company's website at [www.tuigroup.com/en-en/investors/aggm](http://www.tuigroup.com/en-en/investors/aggm).

When you log in to the Investor Portal, we also process the following data from you, which is automatically transmitted to us via your browser:

- the name of the file called up,
- the date and time of your visit,
- the message whether the retrieval was successful,
- the web browser you are using,
- the website you have visited on our site,
- the website from which you are visiting us, and
- the IP address of your end device with which you access our Investor Portal.

### **(3) Purpose of use of your personal data and the legal basis for the processing**

We use the personal data listed under section 2 for the following purposes on the basis of the following legal framework:

#### **a) Data processing due to legal obligations**

We process the personal data provided by you or your custodian bank for the following purposes in the context of holding the Annual General Meeting:

- for your registration for and participation in the Annual General Meeting,
- for holding the virtual Annual General Meeting,
- to fulfill requirements under stock corporation law (e.g. for the list of participants),
- to enable you to exercise your shareholder rights (e.g. right to ask questions and vote),
- for the publication of submitted statements, requests for additions to the agenda, countermotions and election proposals,
- for communication with you as a shareholder.

This data processing is carried out on the basis of legal obligations. The legal basis is therefore Article 6 para. 1 lit. c) of the General Data Protection Regulation (GDPR) (in particular in conjunction with Sections 67, 67c para. 3, 67e, 118a, 122, 123 para. 2, 126, 127, 129 para. 1 sentence 2, 130 para. 6, 130a of the German Stock Corporation Act (AktG)). In addition, there are further legal obligations to process personal data, in particular under tax and commercial law.

#### **b) Data processing to protect our legitimate interests**

Furthermore, we process the personal data provided by you for the following legitimate interests:

- organization and orderly conduct of the Annual General Meeting beyond the matters already mentioned above,
- ensuring the smooth running of the virtual Annual General Meeting, providing the Investor Portal, preventing misuse and eliminating disruptions,
- defence in legal disputes,
- informing co-shareholders and the public about the Annual General Meeting.

The legal basis is therefore Art. 6 para. 1 lit. f) GDPR.

### **(4) Recipients of your personal data**

Your data will be processed within TUI AG by the employees involved in the organization of the virtual Annual General Meeting. Within our group, your data may be transferred to certain companies if they perform centralized data processing tasks for the group's affiliated companies.

In addition, we sometimes use external service providers as data protection processors to fulfill our contractual and legal obligations, Art. 4 No. 8 GDPR.

In addition, we transfer your data to other recipients outside the company who process your data under their own responsibility, Art. 4 No. 7 GDPR. These may be, for example, public bodies based on legal regulations (e.g. supervisory authorities).

Other shareholders and participants in the virtual Annual General Meeting can view the data entered in the list of participants for the shareholder and, if applicable, the proxy.

### **(5) Your rights with regard to your personal data**

You can assert the following rights against TUI AG:

- **Right to information**, Art. 15 GDPR (shareholders can also request information about their personal data entered in the share register in accordance with Section 67 (6) sentence 1 AktG)
  - **Right to rectification**, Art. 16 GDPR
  - **Right to erasure**, Art. 17 GDPR (if there is no legal reason for further storage)
  - **Right to restriction of processing**, Art. 18 GDPR (if your data is processed unlawfully)
  - **Right to data portability**, Art. 20 GDPR
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- **Right to object**, Art. 21 GDPR (if this can be justified by your particular situation and your personal data was processed by us on the basis of Art. 6 para. 1 lit. f) GDPR)

To exercise your rights, please contact us at [Datenschutz@tui.com](mailto:Datenschutz@tui.com). You also have the right to lodge a complaint with a data protection authority. The data protection authority responsible for TUI AG is

The State Commissioner for Data Protection of Lower Saxony

Prinzenstrasse 5

30159 Hanover

#### **(6) Storage duration of your personal data**

We do not store your personal data for longer than it is necessary to fulfil the aforementioned purposes. Only the opening of the Annual General Meeting by the chairman of the meeting and the speeches by the Chief Executive Officer and the Chief Financial Officer will be available on the website as a video after the virtual Annual General Meeting.

Statutory retention obligations are observed (e.g. in the AktG, the German Commercial Code, the German Fiscal Code). The storage period for data collected in connection with Annual General Meetings is up to three years. We must retain the data stored in the share register for ten years after the shares have been sold. In addition, we only retain personal data in individual cases if this is necessary in connection with claims asserted for or against our company.

If you authorize the company-appointed proxies for the Annual General Meeting, it is required by law that the data serving as proof of authorization be recorded in a verifiable manner and stored for three years with access protection (Section 134 para. 3 sentence 5 AktG).

#### **(7) Provision of your personal data**

As a shareholder, you are legally obliged to provide us with the information required to maintain the share register. Intermediaries/credit institutions involved in the transfer or custody of registered shares are obliged to provide us with the information required to maintain the share register (Section 67 para. 4 AktG). Beyond this, there is no obligation to provide personal data. However, if this is necessary in order to exercise shareholder rights, failure to provide it may mean that shareholder rights cannot be exercised.