



Data protection policy

Scope	Adler Group
approved on	09.02.2021
Department responsible	Compliance & Risk Management
last amended on	07.01.2022
checked on	07.01.2021

Inhalt

1. <i>Introduction</i>	4
2. <i>Subject matter and scope</i>	4
3. <i>Purpose</i>	5
3.1 Lawfulness	5
3.2 Fairness.....	5
3.3 Transparency	6
3.4 Purpose limitation.....	6
3.5 Data minimisation.....	6
3.6 Accuracy.....	6
3.7 Period of storage (“storage limitation”).....	6
3.8 Integrity and confidentiality.....	6
3.9 Accountability and documentation	6
4. <i>Technical and organisational measures</i>	7
5. <i>International data transfers</i>	7
6. <i>Individual responsibilities for ensuring compliance with data protection</i>	7
7. <i>Review and assessment</i>	9

1. Introduction

As a dynamically growing, listed company, we process a large amount of personal data in order to perform our tasks and meet our duties to our tenants,* customers, employees, shareholders, business partners, service providers, public authorities and other third parties. Personal data is all information that relates to an identified or identifiable natural person. We process data in different categories and with different requirements for protection. Data that requires a high level of protection includes medical data, the racial or ethnic origin of a natural person, membership of a trade union as well as political opinions within the meaning of Article 9(1) of the General Data Protection Regulation (GDPR). The Adler GROUP does not generally process any data of its tenants that requires a high level of protection. Some of this data does, however, have to be recorded for employees for reasons relating to labour law. The protection of personal data consequently plays an important role at our company. This policy sets out to present a clear overview of the purposes and principles, the organisation and also the responsibilities of data protection in our company.

2. Subject matter and scope

This policy applies to all employees of the companies covered by the scope (page 2) of this policy. It requires all employees to comply with the duties laid down here in the processing of personal data and applies as a supplement to related obligations in their employment contracts. Processing means any operation or set of operations which is performed upon personal data, whether or not by automatic means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, blocking, erasure or destruction.

This policy applies to each form of processing of personal data that is subject to the applicable legislation. It is mandatory and has to be complied with, and it applies without exception to all employees, executives, apprentices, temporary staff, trainees and freelancers of the Adler Group who process personal data.

The Adler GROUP abides by all applicable legislation. If relevant laws stipulate a higher level of protection than indicated in this policy, the Adler Group complies with this higher level of protection.

Should Adler Group companies or organisational units have issued supplementary data protection policies, there must be no contradiction to the provisions of this policy. If they do so, the provisions of this policy are authoritative.

3. Purpose

The purpose of this policy is to implement data protection safeguards in the company and to guarantee these to contractual partners and employees. Ensuring that data is protected forms the foundation for business relationships based on trust. This purpose of this policy is to inform you as an employee of the duties to which the Adler Group and thus also you are subject under data protection law.

The data protection policy of the Adler Group is based on the following principles:

Data security is everyone's responsibility. Maintaining effective and efficient data protection requires a proactive approach to issues of data protection and data security from all of us. All employees of the Adler Group have the responsibility to comply with the data protection policies and procedures of the Adler Group and to report breaches to the relevant supervisor, the data protection team and the data protection officer.

Data protection applies everywhere. The Adler Group endeavours to guarantee an appropriate and proportionate level of data protection awareness, e.g. by trainings, and data security measures throughout the entire organisation and infrastructure. Data protection and data security are top priorities at our company in every respect.

Data protection enables business success. Secure data protection concepts and measures that are implemented proactively and continually updated create an effective distinguishing feature for the Adler Group on the market. Data protection has a direct influence on our success and is therefore of utmost importance to us.

The implementation of the objectives and principles of the GDPR requires a systematic approach that makes a continual improvement process necessary. The aim of the continual improvement process is to improve and optimise the data processing. Deficiencies and vulnerabilities are systematically identified and remedied.

To this end, the following principles within the meaning of Article 5 GDPR are taken into consideration at all stages of the data processing:

3.1 Lawfulness

Personal data must be collected and processed lawfully. The principle that the processing of personal data is prohibited unless permission has been granted applies in general. This means **that any processing of personal data is prohibited in principle** unless there is a legal basis permitting the specific data processing. The relevant legal bases for the processing activities in question are recorded at the Adler Group in the directory of processing activities.

3.2 Fairness

Personal data must be processed in such a way as is required by fair and traditional practice.

3.3 Transparency

The data subjects must be informed to the processing of their personal data within the meaning of Articles 13 and 14 GDPR. If the data is collected directly from the data subject, the data subject must be provided with comprehensive information at the time the data is obtained in accordance with Article 13 GDPR. If the data is not obtained from the data subject themselves, they must be informed of this within a reasonable period after the personal data has been obtained in accordance with Article 14 GDPR. The period is regarded as reasonable if it is commensurate with the specific circumstances. The calculation here will generally depend on the individual case.

3.4 Purpose limitation

Personal data may be processed only for the purposes that have been defined and notified to the data subject before the data is collected. Subsequent changes to the processing purposes are possible only if they are justified. Furthermore, the data subject has to be informed of any changes to the purpose.

3.5 Data minimisation

Before the data is processed, an examination must be carried out to check whether and to what extent this is necessary in order to achieve the purpose pursued by the processing. Personal data may not be stored and retained for potential future purposes, unless this provided for by statutory regulations or has been explicitly permitted by the data subject.

3.6 Accuracy

When personal data is stored, it must be accurate, complete and up to date. Furthermore, reasonable steps must be taken to ensure that inaccurate, incomplete and old data is erased, rectified or updated.

3.7 Period of storage (“storage limitation”)

Personal data that is no longer required after statutory retention periods have expired or the need to keep it has lapsed must be erased without delay.

3.8 Integrity and confidentiality

Personal data must be handled in strict confidence and secured by appropriate technical and organisational measures against unauthorised access, unlawful processing, manipulation and disclosure as well as loss. The Adler Group takes into consideration and documents the data protection principles of privacy by design and privacy by default in the development and design phase before data processing operations are implemented.

3.9 Accountability and documentation

As the controller responsible for the data processing, the Adler Group must be able to demonstrate that it complies with the purposes and principles of the GDPR in accordance with Article 5(1) of the regulation.

This includes documenting the processing activities by recording the procedure in the directory of processing activities as well as fulfilling the requirement to provide the data subject with information in accordance with Articles 13 and 14 GDPR. Furthermore, a deadline for erasing data has to be defined and adhered to.

The responsibilities as well as the authorisations have to be clearly defined in advance when the processing activity is prepared. The competent employees have to be appropriately trained and their awareness raised with regard to data protection.

4. Technical and organisational measures

The measures to implement this policy are carried out in the form of technical and organisational measures. These also include policies, company regulations/policies and operating instructions. These have to be followed by the employees so that the requirements of data protection law can be successfully implemented at all levels of the Adler Group.

5. International data transfers

The Adler Group will forward or disclose personal data to companies in countries outside the European Economic Area, including the subsidiaries of the Adler Group, only if it is ensured that the personal data can be appropriately protected there. To this end, the data protection team defines categories of permitted data transfers in co-operation with the external data protection officer and will define compliant methods for new transfers when necessary.

6. Individual responsibilities for ensuring compliance with data protection

As the **controller** within the meaning of Article 4(7) GDPR, the Adler Group is required to pay attention to and comply with data protection requirements.

The Adler Group has appointed an external **data protection officer** in order to fulfil this obligation. The external data protection officer is the point of contact for the topic of data protection and for all related issues. They play an advisory and monitoring role with regard to the processing of personal data in the Adler Group. Their duties and powers are clearly defined in the GDPR.

Within the company, the data protection officer is supported by a **data protection team, which is part of the Compliance & Risk Management division**. The data protection team is responsible for developing and addressing the necessary measures. It maintains a constant exchange of information with the data protection officer in order to guarantee a process of continual improvement. The data

protection team supports the data protection officer in implementing the requirements of data protection law in the company.

The **IT department** implements the policies and other requirements relating to data protection in its field of responsibility. Measures that have an impact on data protection are agreed with the data protection officer.

All employees are required to comply with and to adhere to this policy as well as other policies and instructions on data protection.

Project managers must consult the data protection team in advance in all projects that have an impact on the processing of personal data in order to ensure that the regulations of data protection law are complied with. The data protection team attends to the issues and consults the data protection officer when necessary.

The data protection officer also has to be involved at an early stage in the planning and introduction of new processes where personal data will be processed. The same shall apply to changes to existing processes.

If external service providers and other contractors are commissioned to process data or the possibility exists that they will gain knowledge of personal data, they must be compelled by separate agreements to comply with the requirements relating to data protection. Consequently, the commissioned data processing contracts are entered into with all services providers that act as processors within the meaning of Article 28(1) GDPR. The Adler Group model contracts, which can be requested from the data protection team, have to use for these purposes. In cases in which commissioned data processing contract forms of external service providers are to be used, these must be forwarded to the data protection team for review before they are signed.

In order to guarantee data protection in the company, incidents in the area of data protection must be reported to the data protection officer and the data protection team by all employees **immediately they become aware of them**. The report must be sent to the e-mail address datenschutz@adler-group.com. The IT department additionally has to be informed. You can find the contact details you need on the intranet. If possible, the form provided for this, which is also available on the intranet, should be used. The relevant supervisor must additionally be informed.

The data protection officer will forward the report to the company management if necessary. Depending on the nature of the data protection incident, a report may also have to be submitted to the competent data protection supervisory authority.

7. Review and assessment

All relevant data protection regulations of the GDPR and of the Bundesdatenschutzgesetz (BDSG – German Federal Data Protection Act) are taken into consideration when planning new processing activities. Furthermore, the lawfulness of the existing procedures for processing activities are reviewed on a regular basis. In addition to this, a data protection impact assessment can also be carried out, which can be used as a suitable means of analysing the risk of a procedure.

The purpose, the legal basis and also the recipients are ascertained before personal data is processed. It must furthermore be established whether the data processing is to be carried out with the support of a processor. If the need to involve a processor is confirmed, a commissioned data processing contract must be entered into with the service provider in question.

The data processing procedure is reviewed and assessed after the processing operation has been implemented. In particular, the effectiveness of the technical and organisational measures that have been implemented is to be assessed. This can be done through internal audits as well as by external reviews. Furthermore, the processors engaged must be subjected to regular reviews to ensure that they are complying with the requirements of data protection. A report can additionally be obtained from the data protection officer for documentation purposes once every calendar year.

Berlin, January 2022

* To make it easier to read, third person plural pronouns are used throughout this policy. They refer to all genders as a matter of course.

Editor:

Adler Group

Compliance & Risk Management

datenschutz@adler-group.com