



ADLER Group S.A.
Société anonyme
55, Allée Scheffer, L-2520 Luxembourg,
Grand Duchy of Luxembourg
RCS Luxembourg: B197554
(the "Company")

DATA PROTECTION NOTICE

This Data Protection Notice explains what personal data ADLER Group S.A. (the "**Company**", "**we**", "**us**") collects and processes, how and why it is used, who it may be shared with, and your rights. It is provided in connection with your role as a shareholder or holder of voting securities (*parts bénéficiaires*) and the upcoming general meeting ("**GM**").

1. Definitions

Personal Data: means any information relating to a natural person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, or an online identifier.

Processing: means any operation, which is performed on Personal Data, such as collection, recording, organising, structuring, storing, adaptation or any kind of disclosure or other use.

2. Information on the data controller

We, ADLER Group S.A., a public limited company incorporated and existing under the laws of the Grand Duchy of Luxembourg, having its registered office in 55, Allée Scheffer, L-2520 Luxembourg, Grand Duchy of Luxembourg, will act as data controller for the processing of your Personal Data. This means that we are responsible to ensure that your Personal Data is being processed in a correct manner and in accordance with applicable legislation.

3. Personal Data Processed

We collect the following categories of information about you:

- a) Name
- b) Address
- c) Phone number
- d) Email address
- e) Number of shares you hold on the relevant record date according to the record date confirmation issued by your depositary bank that is safekeeping your shares
- f) Number of voting securities (*parts bénéficiaires*) held on the record date, as confirmed by your depositary bank
- g) Number of votes that you wish to cast for voting at the GM

- h) The form of participation at the GM
- i) The voting instructions you will provide to a proxyholder who will represent you at the GM

We will receive this information through HCE Consult AG, acting as our agent for this purpose, who receives the information directly/indirectly from you or your individual depository banks.

In certain cases, we may be legally required to process additional Personal Data, in particular under laws applicable to issuers listed on a regulated market. We will inform you before processing your data for any purpose not set out below.

4. Purposes and legal basis for the Processing of your Personal Data

Your Personal Data is Processed exclusively in accordance with the European General Data Protection Regulation (“**GDPR**”), the applicable Luxembourg data protection laws, as amended from time to time, the Luxembourg Law of 10 August 1915 on Commercial Companies, as amended (*loi modifiée du 10 août 1915 concernant les sociétés commerciales*, hereafter the “**Company Law**”), and all other applicable laws.

We Process your Personal Data for the following purposes:

- To hold the GM;
- To enable you or your proxyholders to participate in the GM;
- To enable your proxyholders to exercise your rights as part of the GM (e.g. voting right); and
- To publish the attendance percentage and the voting results of our GM.

The Processing of your Personal Data will be based on one of the following legal basis:

- To comply with our legal obligations in connection with the holding of general meetings (Article 6 (1) c) GDPR in connection with the Luxembourg law of 24 May 2011 on the exercise of certain rights of shareholders in general meetings of listed companies, as amended, and the Company Law;
- To meet our legitimate interests, i.e. to enable the GM to be held in an orderly manner (Article 6 (1) f) GDPR).

5. Categories of recipients

We process your Personal Data in accordance with applicable data protection laws and disclose it only as necessary for the purposes outlined herewith. Your data may be shared with Luxembourg authorities, auditors, legal advisors, notaries, and corporate service providers in connection with the organization and holding of the GM.

6. Information transfer

Your Personal Data will not be transmitted to countries outside of the European Union or to any international organisations.

7. Retention Periods

We strive to limit the processing of your Personal Data and retain it only as long as necessary for the purposes for which it was collected and as required by law, after which it will be deleted. Where legal accountability obligations apply, relevant data will be retained for 10 years.

8. Obligation for the Provision of Personal Data

As a shareholder or holder of voting securities, you are obliged to provide us with the Personal Data set out above.

9. Your Rights

Depending on the specifics of the case, you may be entitled to exercise some or all of the following rights. You may:

- require confirmation as to whether Personal Data concerning you is undergoing Processing, and where that is the case, require access to the Personal Data retained and additional information via a copy that is provided free of charge;
- request proper rectification, erasure or restriction of your Personal Data, e.g. because it is incomplete or inaccurate, it is no longer needed for the purposes for which it was collected, or you have taken advantage of an existing right to object to the Data Processing; in case the Personal Data is processed by third parties, your request for rectification, erasure or restriction will be forwarded also to such third parties unless this proves impossible or involves disproportionate effort;
- take legal actions in relation to any potential breach of your rights regarding the Processing of your Personal Data, as well as to lodge complaints before the National Commission for Data Protection; and/or require not to be subject to any automated decision making, including profiling (automatic decisions based on Data Processing by automatic means, for the purpose of assessing several personal aspects) which produce legal effects on you or affects you with similar significance;
- object, on grounds relating to your particular situation, to processing your personal data, in case such processing is either based on our or a third party's legitimate interests or on a performance of a task carried out in the public interest. In this case, please provide us with information about your particular situation. After the assessment of the facts presented by you, we will either stop processing your personal data or present you our compelling legitimate grounds for ongoing processing.

10. Contact details

Please submit any questions, concerns or comments you have about this Data Protection Notice or any requests concerning your Personal Data to **Ms Colleen Yorke**, by email at c.yorke@adler-group.com.

11. Changes to the Data Protection Notice

You may request a copy of this Notice from us using the contact details set out above. If we change this Data Protection Notice, the updated version will be posted on our website in a timely manner.

Effective from 12 May 2026