

Data Privacy Statement for Shareholders - Schweizer Electronic AG

Schweizer Electronic AG Shares are registered shares, which is why we are legally obliged to keep a share register. In the following, we will inform you about how we process your personal data if you provide us with personal data for the share register via your bank, in writing or by e-mail or if you inform us about changes to the personal data stored about you in the share register of Schweizer Electronic AG. We would also like to inform you about which data protection rights you are entitled to.

1. DATA CATEGORIES, PURPOSE OF PROCESSING AND LEGAL BASIS

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 other relevant legal provisions.

In the case of registered shares, § 67 AktG stipulates that they must be entered in the company's share register, stating the name, date of birth and address of the shareholder as well as the number of shares. In principle, the shareholder is obliged to provide the company with this information. Further optional information that we receive from you may be for instance E-mail address and telephone number.

The credit institutions involved in the acquisition or safekeeping of your Schweizer Electronic AG registered shares regularly manage for you the providing of information which are relevant to the management of the share register (e.g. Name, date of birth, address, nationality) to us. This is done via Clearstream Banking Frankfurt, which, as the central securities depository, handles the technical settlement of securities transactions and the safekeeping of shares for credit institutions. The same applies to the sale (discharge from the share register) of your shares.

You have the possibility to send us in writing e.g. by e-mail, letter or by telephone address changes, e-mail addresses or to communicate your power of attorney and instructions in advance of the Annual General Meeting of Schweizer Electronic AG. If you make use of this option, we will use the personal data you provide exclusively to update our share register in accordance with your information or to implement your requirements at the corresponding Annual General Meeting

The legal basis for the processing of your personal data is the German Stock Corporation Act in conjunction with Article 6 (1) (c) GDPR. We use your personal data in particular to maintain the share register, communicate with you as a shareholder and to process the Annual General Meeting. If you attend our Annual General Meeting, we will need your name and the number of your shares to send you the necessary voting documents. These data will later also appear in the directory of participants to be included by law. Even if you make a request to supplement the agenda or make counter motions or nominations, we must publish your name under certain conditions.

If virtual general meetings take place, a login time stamp is collected and the name of the retrieved file, the date and time of the retrieval, the message whether the retrieval was successful, the description of the type of web browser used, the referrer URL (the previously visited page), the host name of the accessing computer (IP address) is stored in the server log

files. In the login mask, shareholder number and password or registration confirmation number and Internet access code as well as the e-mail address are processed.

This also applies to applications that you have applied for or authorised for third parties. In the case of postal voting, the notes given are processed by postal vote or instructions to the proxy. The purpose is to identify eligible shareholders and to authorize them to vote at the virtual general meeting, to establish and maintain the electronic connection, to produce forgotten electronic passwords, to send registration confirmations and to manage voting.

In addition, we only use your data for purposes that are compatible with the afore mentioned purposes (e.g., keeping statistics on stock transactions, shareholder development, overview of the largest shareholders).

We may also process your personal data to fulfil other legal obligations such as trading, tax, stock corporation or regulatory requirements or retention periods.

In individual cases, we also process your data to safeguard legitimate interests in accordance with Article 6 (1f) GDPR. This is the case if for example, in the case of capital increases, we have to exclude individual shareholders from information on subscription offers on the basis of their nationality or place of residence in order to comply with the securities regulations of such non-European countries.

If you have provided us with your e-mail address for the electronic dispatch of the annual general meeting documents, we will process them with your consent in accordance with § 1a) DSGVO. You can revoke this consent at any time without giving reasons.

If you order tickets to the Annual General Meeting for an authorised representative of yours, you must point this out to the person you have appointed to the data collection at Schweizer Electronic AG. Schweizer Electronic AG collects the data of the authorized representative only for the purpose of sending the tickets, as well as carrying out the participation of this person in the Annual General Meeting, including the exercise of the related rights, in particular the voting rights.

If we wish to process your personal data for a purpose not specified above, we will inform you in advance within the framework of the statutory provisions.

2. RESPONSIBLE POSITION IN THE COMPANY

The responsible body for the collection, use and processing of your personal data is, unless otherwise agreed, is Schweizer Electronic AG, Einsteinstraße 10, 78713 Schramberg, represented by the board members Nicolas-Fabian Schweizer and Marc Bunz.

3. TRANSMISSION AND DISCLOSURE OF PERSONAL DATA

External service providers:

We use external service providers for the administration and technical management of the share register (share register service company, IT service provider) as well as for the processing of the annual general meetings (AGM service provider). Your personal data will be processed exclusively within the framework of contractually regulated order data processing. The service provider does not use the data for its own purposes.

Other recipients:

If you take part in the Annual General Meeting, Schweizer Electronic shareholders can view the data on your person in the list of participants in accordance with § 29 AktG. In addition, we may transfer your personal data to other recipients, such as authorities to fulfil statutory notification obligations (e.g., if legally prescribed voting rights thresholds are exceeded). Certain information is to be made available to a so-called area public in accordance with legal requirements and is therefore available on the Internet and published on our website.

4. DATA STORAGE

Insofar as no express storage period is specified during the collection (e.g., in the context of a declaration of consent), your personal data will be anonymized or deleted insofar as they are no longer necessary to fulfil the purpose of the storage, unless statutory storage obligations prevent deletion. (Corresponding proof and storage obligations arise, among other things, from the Commercial Code, the Tax Code and the Money Laundering Act).

For data collected in connection with the Annual General Meeting, the retention period is regularly three years. After the sale of your shares, we must regularly keep the data stored in the share register for another ten years.

In addition, we only retain your personal data to the extent necessary in connection with possible claims against us. The statutory limitation period is usually three years, in some cases up to 30 years.

5. REVOCABILITY OF DECLARATIONS OF CONSENT GIVEN

If you have given your consent that we may process your personal data, you have the right to revoke the consent given at any time with effect for the future, i.e., the revocation does not affect the legality of the processing carried out on the basis of the consent before the revocation. After revocation, Schweizer may only process the personal data to the extent that Schweizer can base the processing on another legal basis.

6. RIGHT TO INFORMATION, CORRECTION, DELETION OR RESTRICTION OF YOUR PERSONAL DATA, RIGHT TO OBJECT AND RIGHT TO DATA PORTABILITY

According to applicable data protection law, you may have the right to:

- (i) to request confirmation of whether Schweizer processes personal data about you and to obtain information about the personal data processed by Schweizer.

- (ii) the rectification of inaccurate personal data,
- (iii) to request deletion of personal data processed by Schweizer
- (iv) to demand the restriction of the processing of personal data by Schweizer,
- (v) to receive personal data that you have provided by Schweizer in a structured, commonly used and machine-readable format or to request that the personal data be transmitted to a third party or
- (vi) to object to the data processing of your personal data by Schweizer.

7. CONTACTS

The Schweizer data protection organization supports all questions relating to data protection. Complaints can also be lodged with the Schweizer data protection organisation and the rights referred to in section 5 can be asserted.

The Schweizer data protection organisation can be contacted at datenschutz@schweizer.ag.

The responsible data protection officer of Schweizer Electronic AG is:

Thomas Brüstle
Schweizer Electronic AG
Einsteinstrasse 10
78713 Schramberg, Germany
E-Mail: datenschutz@schweizer.ag

Schweizer always strives to address inquiries and complaints received via the above-mentioned channels and to remedy them. In addition to the above-mentioned contact options at Schweizer, you also have the option of contacting the competent data protection supervisory authority at any time.

The data protection authority responsible for Schweizer Electronic AG is: Der Landesbeauftragte für den Datenschutz und die Informationsfreiheit Baden-Württemberg, Postfach 10 29 32, 70025 Stuttgart, Königstraße 10a, 70173 Stuttgart, www.baden-wuerttemberg.datenschutz.de