



AROUNDTOWN SA

Société Anonyme

Registered office: 1, avenue du Bois

L-1251 Luxembourg

R.C.S. Luxembourg: B 217868

(the "**Company**")

Data Protection Addendum

Due to new data protection rules entering into force from 25th May 2018, Arountown SA is obliged to inform its shareholders about the Processing of their Personal Data. The following information shall provide an overview on the kind of Personal Data we collect, how we use it, for which purposes we use it, with whom we share it and which rights you have regarding the Processing of your Personal Data.

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. Purposes of the Processing

Your Personal Data is Processed exclusively in accordance with the European 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, "LSC"), and all other applicable statutes.

2.1 We Process your Personal Data for the purpose of holding the Annual General Meeting ("AGM"). In order to enable you to participate in and vote at the AGM, we Process the number

of shares you hold on the relevant record date according to the record date confirmation issued by your depository bank that is safe-keeping your shares. Additionally, we Process Personal Data concerning your attendance at the AGM. This includes, for example, your name, address, email address and phone number, if you will attend the AGM in person or if you will be represented by a proxyholder in relation to such proxyholder, and, if applicable, the voting instructions you provided to your proxyholder. The legal basis for this Processing is Art. 6 (1) 1 lit. c GDPR in connection with Art. 5 (3) and Art. 9 of the Luxembourg law of 24 May 2011 on the exercise of certain rights of shareholders in general meetings of listed companies, as amended, and Art. 450-1 (2) LSC.

- 2.2 Moreover, the above mentioned Personal Data as well as your voting decisions will be Processed in order to publish the attendance percentage and the voting results of our AGM. The legal basis for this Processing is Art. 6 (1) 1 lit. c GDPR in connection with Art. 11 of the Luxembourg law of 24 May 2011 on the exercise of certain rights of shareholders in general meetings of listed companies, as amended.
- 2.3 In some cases we may be legally obliged to Process additional Personal Data, notably in connection with any laws applicable to issuers whose securities are listed on a regulated market. However, we will contact you prior to Processing your Personal Data for any purpose not listed above.

3. Disclosure of Personal Data

- 3.1 We ensure that your Personal Data is only Processed in accordance with the applicable data protection laws. Therefore, your Personal Data will be disclosed only insofar as reasonably necessary for the purposes set out in this Data Protection Addendum. Within the scope of our data processing activities, your Personal Data may be disclosed to authorities in Luxembourg, and to our auditors and legal advisors, any Luxembourg notary and/or corporate service providers for the purposes of holding and organizing the AGM. The legal basis for this Processing is Art. 6 (1) 1 lit. c GDPR in connection with Art. 11 of the Luxembourg law of 24 May 2011 on the exercise of certain rights of shareholders in general meetings of listed companies, as amended, and Art. 6 (1) 1 lit. f GDPR. We have a legitimate interest to obtain consultancy in organizing and conducting the AGM.
- 3.2 Your Personal Data will not be transmitted to countries outside of the European Union or to any international organisations.

4. Retention Periods

We strive to limit our Data Processing Activities with respect to your Personal Data. Your Personal Data will, therefore, be retained only for as long as necessary for the purposes for which we have collected it and as long as required by statutory retention provisions. Since we are subject to legal accountability obligations, your Personal Data will be retained for 10 years.

5. Obligation for the Provision of Personal Data

As a shareholder you are obliged to provide us the Personal Data set out above.

6. 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 or not 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 competent Data Protection Regulators; 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.

Additionally, you shall be entitled to object to the Processing of your Personal Data:

- at any time, if your Personal Data is used for direct marketing purposes; and

- based on grounds relating to your particular situation, if your Personal Data is Processed for other purposes.

7. Contact details

Please submit any questions, concerns or comments you have about this Data Protection Addendum or any requests concerning your Personal Data by email to dataprotectionofficer@aroundtownholdings.com.