

Privacy Notice for Shareholders of Aladdin Blockchain Technologies Holding SE

As of 25 May 2018, new regulations on data protection will apply with regard to the General Data Protection Regulation (GDPR). Aladdin Blockchain Technologies Holding SE (hereinafter referred to as "**Company**") attaches great importance to compliance with data protection regulations. With the following information the Company would like to inform you as the Company's shareholder about the processing of your personal data and the rights to which you are entitled under data protection law.

1. Categories of personal data and sources the personal data originate

The Company processes personal data, which has been provided to the Company by or on behalf of the respective shareholders usually in the context of the preparation and the holding of the Annual General Meeting. These data include the respective shareholder's name and place of residence and the number of shares held by the shareholder as well as possibly your e-mail address or data on the participation in the Annual General Meeting.

2. Purpose and legal basis for the processing of personal data

The Company processes your personal data in accordance with the scope of the GDPR, the Federal Data Protection Act (BDSG), the AktG and all other relevant legal provisions.

2.1 Data processing based on legal requirements (Art. 6 para. 1 lit. c) GDPR)

The Company processes your personal data for the purposes provided for in the AktG, in particular, to handle its Annual General Meetings.

In addition, the Company may also process your personal data to meet further legal obligations, such as regulatory requirements or retention obligations under stock corporation law, commercial law and tax law. For example, if the voting right is to be exercised by a proxy, proof of the authorization must be verifiably recorded for three years (Sec. 134 para. 3 sentence 5 AktG).

2.2 Data processing for the protection of legitimate interests (Art. 6 para. 1 lit. f) GDPR)

The Company processes your data in a permissible manner to protect the Company's legitimate interests. This is the case if, for example, in the event of a capital increase the

Company is obliged to exempt individual shareholders from information on subscription offers due to their nationality or place of residence to comply with securities regulations of the countries concerned.

In addition, your data can be used to compile statistics. The Company has legitimate interests regarding the compilation of such statistics as they allow the Company to present and to assess the shareholder performance.

The Company will inform you in advance within the framework of the statutory provisions if it wishes to process your data for a purpose other than those mentioned here.

3. Transfer of personal data

To handle the Annual General Meeting (e.g. for printing and sending shareholder notifications or for holding the Annual General Meeting), the Company makes use of external service providers who may have access to your personal data within the scope of the tasks assigned to them. The Company's service provider for preparing and holding the Annual General Meeting is Link Market Services GmbH.

In addition, the Company may transfer your personal data to other recipients insofar as this is required for the fulfilment of legal obligations, e.g. to authorities for the fulfilment of legal notification obligations. If you participate in the Annual General Meeting, other shareholders of the Company may view the personal data recorded in the list of participants pursuant to sec. 129 AktG.

4. Duration of storage or erasure of personal data

The Company erases or anonymizes your personal data as soon as they are no longer required for the purposes mentioned and there are no other legal storage obligations or justification reasons for the storage. These include storage obligations under the AktG, the German Commercial Code (HGB) or the German Fiscal Code (AO).

The retention period for data recorded relating to the Annual General Meeting is usually 3 years. Furthermore, the Company only stores your personal data if this is necessary regarding possible claims against the Company.

If you have any questions or complaints regarding data protection, please do not hesitate to contact the Company. You will find the Company's contact details under paragraph 6 of this Privacy Notice.

5. Your rights

This includes the right of access to your personal data under Article 15 GDPR, the right to rectification of inaccurate personal data under Article 16 GDPR, the right to erasure of your data under Article 17 GDPR, the right to restriction of processing under Article 18 GDPR and the right to data portability under Article 20 GDPR.

Right to object:

If the Company processes your data for legitimate interests, you may object to such processing if your particular situation gives rise to reasons which are opposed to such data processing. The data processing activities shall be ceased, unless the Company is able to show compelling legitimate grounds which outweigh the interests, rights and freedoms of the person in question, or insofar as the data is processed for the purpose of asserting, exercising or defending legal entitlements. Please address your objection to the address given in paragraph 6 of this Privacy Notice.

If you have any comments or complaints, you also have the opportunity to contact a data protection regulatory authority. The Company's competent data protection regulatory authority is:

Berliner Beauftragte für Datenschutz und Informationsrecht, Friedrichstraße 219, 10969 Berlin

<http://www.datenschutz-berlin.de>

6. Controller and Data Protection Officer

Controller for processing your personal data is:

Aladdin Blockchain Technologies Holding SE

Unter den Linden 10

10117 Berlin

Phone: +49 30 700 140 449

Email: info@aladdinid.com

You can contact the Company's data protection officer at:

Aladdin Blockchain Technologies Holding SE

- Data Protection Officer -

Unter den Linden 10

10117 Berlin

Phone: +49 30 700 140 449

Email: info@aladdinid.com