



GRAND CITY PROPERTIES S.A.

Société Anonyme

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DATA PROTECTION INFORMATION

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 safekeeping 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. Your Personal Data (in particular, your name, e-mail address and IP address) may also be Processed for the purpose of holding virtual AGMs with webconferencing tools. The legal basis for this Processing Activity is Art. 6 (1) 1 lit. f GDPR. We have a legitimate interest in enabling Virtual AGMs to run smoothly (without the physical presence of shareholders or their proxies) and in compliance with applicable laws and regulations.

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 Notice. 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. We may also disclose your Personal Data to technical service providers that we use for holding and organizing a virtual AGM via web conference.

The legal basis for this disclosure is Art. 28 GDPR in connection with the data processing agreement between Grand City Properties S.A. and these service providers.

- 3.2** When using service providers, some of Your Personal Data may be transferred to other countries, including third countries outside of the European Union / European Economic Area where different data protection standards may apply. Please note that data processed in a foreign country may be subject to foreign laws and accessible to foreign governments, courts, law enforcement, and regulatory agencies. However, we will endeavor to take the required measures to maintain an adequate level of data protection when sharing your personal data with recipients established in such countries. In the case of a transfer to a country outside of the EU/EEA, it is either safeguarded by a so-called adequacy decision from the European Commission declaring that such country provides for an adequate level of data protection, or, if such adequacy decision does not exist, the conclusion of EU Standard contractual clauses (https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en) and additional measures, if necessary.

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 and will be deleted afterwards. Insofar as we are subject to legal accountability obligations, your Personal Data affected by these accountability obligations 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 are entitled to:

- object, on grounds relating to your particular situation, to processing of 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 an ongoing processing.

7. Contact details

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