

## **Data Protection Notice for Shareholders of SAP SE, Walldorf, Germany**

In accordance with the EU General Data Protection Regulation ("GDPR") we would like to inform you by the notice below about the processing by SAP SE of the personal data of shareholders and their proxies as well as guests attending General Meetings of Shareholders, and your rights under data protection law.

### **Who is responsible for the data processing?**

SAP SE, Dietmar-Hopp-Allee 16, 69190 Walldorf Germany. Mathias Cellarius ([privacy@sap.com](mailto:privacy@sap.com)) is SAP SE's Data Protection Officer.

### **For which purposes and based on which legal provisions will the data be processed?**

#### ***Fulfillment of legal obligations, particularly under stock corporation law and securities law (Article 6 paragraph 1 lit. c of the GDPR):***

Our company's shares are bearer shares. For this reason, no share register is maintained. SAP SE, however, uses the personal data of its shareholders and their proxies, if any, to fulfil its obligations under the German Stock Corporation Act, particularly in connection with the preparation and holding of its General Meetings of Shareholders, also in virtual form (for the verification of rights to attend General Meetings of Shareholders, inscription in register of attendees, enablement to exercise shareholder rights in relation to General Meetings of Shareholders, also by using the shareholder portal, including the granting and revoking of proxy authorizations, etc.). The processed data includes in particular the name, residence or postal address, email address, if any, information about shareholdings, number of entry ticket to the SAP General Meeting of Shareholders, access data to the shareholder portal, questions and video statements submitted prior to the General Meeting, submission of votes, and the granting of any proxies. The provision of the above-mentioned data is indispensable to enable shareholders and their proxies to exercise their rights in relation to General Meetings of Shareholders (particularly attendance, voting, information request and other shareholder rights).

SAP SE may process shareholders' personal data also for the publication of voting rights notifications. That data includes name and date of birth as well as information about holdings of SAP shares at a certain time, subsidiaries, if any, whose shareholdings are attributable to the notifying party, and about proxies, if any.

#### ***Legitimate interest (Article 6 paragraph 1 lit. f) GDPR):***

You can object to our processing of your personal data to safeguard our legitimate interests, if you have specific reasons opposed to such processing of your data. Please send your objection to our investor relations department by email to [investor@sap.com](mailto:investor@sap.com). The data processing will then be terminated unless we can prove having compelling legitimate reasons for the processing which outweigh your interests, rights and freedoms, or the data processing is aimed at asserting, exercising or defending legal claims.

SAP SE's General Meetings of Shareholders are regularly attended also by guests. They are also subject to the collection of personal data (i.e., names, residence or postal address, and email address, if any) to enable their access to the General Meeting of Shareholders.

### **To which categories of recipients may your data be passed on?**

#### ***External service providers:***

We engage various external service providers and advisers for carrying out General Meetings of Shareholders and for the publication of voting rights notifications. We will pass on personal data to them only to the extent required for the service in question. The service providers and advisers will process the data exclusively according to our instructions.

#### ***Further recipients:***

Furthermore, it can be required to pass on your personal data to further recipients to the extent necessary to fulfill legal obligations. For example, if you attend the General Meeting of Shareholders, other SAP shareholders and their proxies are entitled pursuant to section 129 of the German Stock Corporation Act to inspect your personal data contained in the register of attendees as prescribed by stock corporation law.

We may also be obliged to publish shareholders' notifications of voting rights.

### **For how long will your data be stored?**

Generally, your personal data will be deleted or anonymized as soon as the data is no longer required for the purposes stated above or further processing is no longer permissible due to your objection, and provided that we are not obliged to continue storing your data to comply with statutory record-keeping and storage obligations. Such obligations may include storage obligations under the German Stock Corporation Act, the German Commercial Code or the German General Tax Code.

## What rights do you have?

Under certain statutory conditions you have the right of information about the personal data we have recorded about you pursuant to Article 15 GDPR, the right of correction of your data pursuant to Article 16 GDPR, the right of deletion of your data pursuant to Article 17 GDPR and the right of limitation of the data processing pursuant to Article 18 GDPR. You have the right to claim that SAP limits the processing of your data, if one of the following conditions is met:

- a) If you claim that your personal data stored by SAP is incorrect, (but only for such time as to enable SAP to check the accuracy of your personal data),
- b) If there is no legal basis for the processing of your personal data, and you reject deletion of your personal data but instead demand that it will not be processed any further;
- c) If SAP no longer requires your personal data but you need your personal data stored by us in order to assert, exercise or defend any legal claims, or
- d) If, where SAP processes your personal data to safeguard its legitimate interests, you object to the processing of your personal data by SAP; but only for as long as it is uncertain whether SAP's legitimate interests outweigh yours.

To exercise these rights or if you have any questions or complaints regarding data protection, please contact our investor relations department (by email to [investor@sap.com](mailto:investor@sap.com)).

Furthermore, you may contact the competent data protection supervisory authority if, in your view, SAP has not processed your personal data in accordance with the statements made herein or with applicable EU data protection laws.