

Non-binding translation

Data protection information for shareholders and shareholders' representatives at the General Meeting of ProCredit Holding AG & Co. KGaA

One of the key concerns of the EU General Data Protection Regulation is the transparency of data processing. We take matters of data protection for our shareholders very seriously.

The following information is intended to give you an overview of how we process your personal data and of your rights under data protection legislation.

1. Who is responsible for processing data and who can I contact about this matter?

ProCredit Holding AG & Co. KGaA, Rohmerplatz 33-37, 60486 Frankfurt am Main, Germany (hereinafter also "us", "our", "ourselves" and "we") is responsible for data processing.

You can contact our data protection officer at the above address or by e-mail at pch.datenschutz@procredit-group.com. If you have any questions about data protection with regard to the share register, please contact us at the above address or by e-mail at PCH.ir@procredit-group.com.

2. What data can be processed for what purpose and on what legal basis?

We process your personal data in compliance with the EU General Data Protection Regulation (GDPR), the German Data Protection Act (BDSG), the German Stock Corporation Act (AktG) as well as any other relevant legal provisions.

Shares of ProCredit Holding AG & Co. KGaA are registered shares. In the case of registered shares, section 67 of the German Stock Corporation Act stipulates that they must be entered in the Company's share register; the entry must include the shareholder's name, date of birth, postal address and an electronic address, as well as the quantity of shares held or the share numbers, and in the case of shares with a nominal value, the amount. Regulations oblige the credit institutions involved in the acquisition or safekeeping of your ProCredit registered shares to forward to us any details relevant for maintaining the share register as well as information on your nationality.

We use your personal data solely for purposes stipulated in the German Stock Corporation Act. Specifically, this includes maintaining the share register, communicating with you as a shareholder, and conducting General Meetings. Moreover, we will only use your data for purposes that are compatible with the above-mentioned (in particular for the compilation of statistics, such as for the presentation of shareholder developments, the number of share transactions or overviews of the largest shareholders). The legal basis for the processing of your personal data is the German Stock Corporation Act (AktG) in conjunction with article 6 (1)(c) and (4) GDPR.

In addition, we may also process your personal data to fulfil other legal obligations, such as supervisory regulations or requirements under securities law, as well as data retention obligations under company, commerce and tax law. In order to comply with the provisions of the German Stock Corporation Act, for example when authorising the voting representatives nominated by the Company for the General Meeting, we must record the data that serves as proof of said authorisation for verification purposes and retain it for three years in an access-protected manner (section 134 (3) sentence 5 AktG). The legal basis for processing in such cases is provided by the relevant legislation in conjunction with article 6 (1)(c) GDPR.

In addition to processing on the basis of legislation, we also process personal data to protect our

legitimate interests in accordance with article 6 (1)(f) GDPR.

We have a legitimate interest in ensuring that the General Meeting runs smoothly. If you object to resolutions of the General Meeting at the General Meeting, we will accordingly process your full name and postal address as shareholder, in order to process said objections. If you authorise a third party to attend the General Meeting on your behalf, we will also process this person's name and address in order to create the authorised representative ticket.

There is also a legitimate interest with regard to compliance with non-European securities regulations, such as in the case of capital increases, where on the grounds of their nationality or place of residence we may have to exclude certain shareholders from being informed about subscription offers in order to comply with the respective legislation.

Should we wish to process your personal data for a purpose not mentioned above, we will inform you of this in advance in accordance with the statutory provisions.

3. Who can obtain my data?

At ProCredit Holding AG & Co. KGaA, the only persons given access to your data are those who need it in order to fulfil our obligations towards you. Service providers and agents engaged by us can also be provided with data for these purposes. If such service providers or agents come into contact with the personal data of our shareholders, this is done solely within their function as "Processor", which is expressly provided for by law (article 28 GDPR). ProCredit Holding AG & Co. KGaA still remains responsible for the protection of your data in this case. We carefully select our service providers and they work exclusively in accordance with our instructions, which we ensure through contractual regulations, technical and organisational measures, as well as supplementary control checks. Our service providers are companies that fall under the following categories: Service providers for the maintenance of the share register, IT service providers, and service providers for the preparation and execution of the General Meeting.

We also transfer your data to other recipients who are authorised to process your data on their own responsibility. These include public authorities, for example when complying with reporting obligations (such as when statutory voting rights thresholds are exceeded).

4. Will my data be transmitted to a third country?

We do not intend to transfer your personal data to a third country outside the European Economic Area (EEA) or to any international organisation. Nor do we pass on personal data to service providers outside the EEA.

5. How long will my data be stored?

As a rule, we anonymise your personal data or delete it as soon as it is no longer required for the above-mentioned purposes unless we are legally required to store it for longer periods of time due to legal obligations to provide proof and to retain data (e.g. in accordance with the German Stock Corporation Act (AktG), the German Commercial Code (HGB), the German Fiscal Code (AO)). Regulations require that data recorded in connection with general meetings must be stored for up to ten years. We are obliged to retain the data recorded in the share register for a further ten years after the sale of the respective shares. Beyond this, we only store personal data in individual cases if this is necessary in connection with claims made for or against our Company.

6. Am I required to provide data?

As a shareholder, you are obliged to provide the Company with the above-mentioned personal details. The credit institutions involved in the transfer or safekeeping of registered shares are also obliged to provide ProCredit Holding AG & Co. KGaA with the information required for the

maintenance the share register (section 67 (1) and (4) AktG).

7. What are my rights as a data subject?

You can request information concerning the personal data stored about you. You have the right to correct any data about you that is incorrect. Please contact your custodian bank in order to do this. In addition, under certain conditions, you can request the deletion of your personal data or a limitation of the processing (e.g. if your data were to be processed unlawfully). **If we process your data to protect our legitimate interests, you have the right to object to this processing should there be any reasons relating to your particular situation that conflict with such data processing.** We will then no longer process your personal data unless we can demonstrate overriding compelling legitimate grounds on our part. Other rights include the right to portability of your data and the right to revoke at any time any consent you may have given, without affecting the legitimacy of the processing prior to revocation.

Should you wish to exercise your rights, you can contact our data protection officer at the above address. You also have the right to complain to a public data protection authority. The data protection authority responsible for ProCredit Holding AG & Co. KGaA is:

The Hessian Commissioner for Data Protection and Freedom of Information, Postfach 3163, 65021 Wiesbaden

Further information on data protection at ProCredit can also be found on our website at <https://procredit-holding.com/data-protection/>