



DIVISION OF  
CORPORATION FINANCE

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549

September 25, 2020

Jacques Stern  
President and Chief Executive Officer  
Global Blue Group Holding AG  
Zürichstrasse 38  
8306 Brüttisellen  
Switzerland

**Re: Global Blue Group Holding AG**  
**Registration Statement on Form F-1**  
**Filed September 18, 2020**  
**File No. 333-248927**

Dear Mr. Stern:

This is to advise you that we have not reviewed and will not review your registration statement.

Please refer to Rules 460 and 461 regarding requests for acceleration. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Please contact Kathleen Krebs, Special Counsel, at (202) 551-3350 or Jan Woo, Legal Branch Chief, at (202) 551-3453 with any questions.

Sincerely,

Division of Corporation Finance  
Office of Technology