

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

DIVISION OF CORPORATION FINANCE

September 19, 2024

Jeremy Henderson-Ross General Counsel Global Blue Group Holding AG Zürichstrasse 38, 8306 Brüttisellen, Switzerland

> Re: Global Blue Group Holding AG Registration Statement on Form F-3 Filed September 12, 2024 File No. 333-282068

Dear Jeremy Henderson-Ross:

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 Charli Wilson at 202-551-6388 with any questions.

Sincerely,

Division of Corporation Finance Office of Technology

cc: Jessica Ansrat