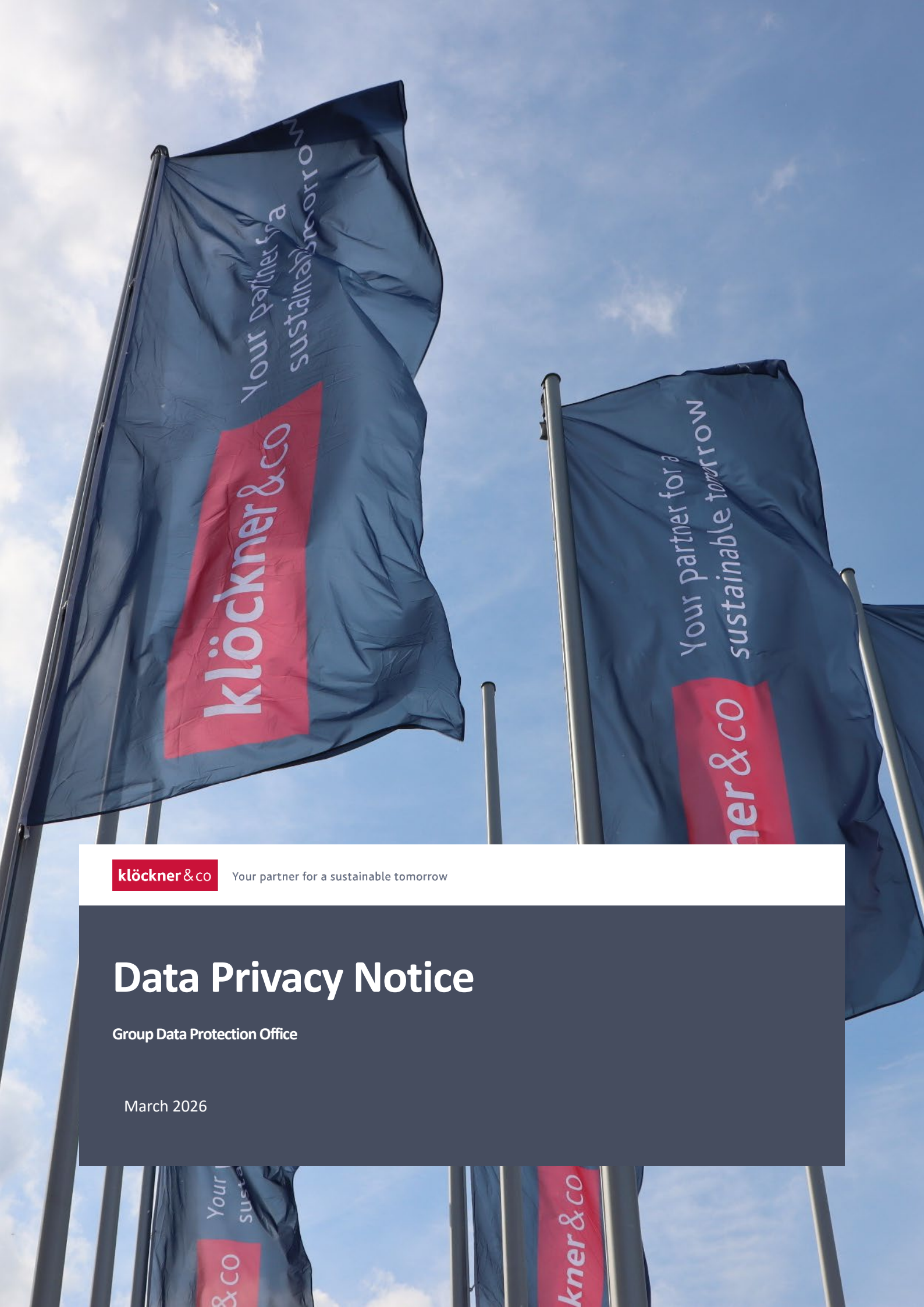

klöckner & co Your partner for a sustainable tomorrow

Data Privacy Notice

Group Data Protection Office

March 2026

Table of Contents

1 Who is responsible for the data processing? How can you contact the Data Protection Officer of Klöckner & Co SE? 2

2 For which purposes and under which legal basis are your data processed? Where does Klöckner & Co SE obtain your data? 2

2.1 Share Register 2
2.2 Other obligations under stock corporation law, securities law provisions 3
2.3 Conducting the general meeting 3
2.4 Internet transmission and minutes 3
2.5 Reporting and analysis of shareholder structure and voting behavior, press and public relations activities 4
2.6 Provision of online services 4

3 Use of Cookies and Processing of Log Data when using the Online Service 5

4 To what categories of recipients might your data by relayed? Who has access to your personal data? 7

5 For how long will your data remain stored? 7

6 What are your rights? 8

1 Who is responsible for the data processing? How can you contact the Data Protection Officer of Klöckner & Co SE?

Controller of the data processing	Data Protection Officer
Klöckner & Co SE	Klöckner & Co SE
c/o Investor Relations	c/o Group Data Protection Officer
Peter-Müller-Straße 24	Peter-Müller-Straße 24
D-40468 Düsseldorf	D-40468 Düsseldorf
E-Mail: ir@kloeckner.com	Mail: dataprivacy@kloeckner.com

2 For which purposes and under which legal basis are your data processed? Where does Klöckner & Co SE obtain your data?

2.1 Share Register

The shares of Klöckner & Co SE are no-par value registered shares. For such registered shares, Section 67 of the German Stock Corporation Act stipulates that these shall be entered in the company's share register stating the name, date of birth, address and email address of the shareholder, as well as the number of shares or the share number. The shareholder shall generally be obliged to provide this information to the company. The credit institutes involved in the acquisition, custody or sale of your Klöckner & Co SE shares regularly forwards this information as well as other information relevant for managing the share register (e.g., nationality, gender and submitting bank) to the share register. The legal basis for processing your personal data is Art. 6 (1) (c) GDPR.

2.2 Other obligations under stock corporation law, securities law provisions

Your personal data may also be processed for the purpose of complying with and reviewing other legal obligations. Prominently enshrined within are obligations under stock corporation and compliance with securities law provisions. This is necessary if, for example, in the case of capital increases, individual shareholders must be excluded from information on subscription offers due to their nationality or place of residence in order to comply with securities law provisions of the countries concerned. In addition, (special) categories of personal data are processed in individual cases for the establishment, exercise or defence of legal claims. The legal basis for processing your personal data is Art. 6 (1) (c) GDPR.

2.3 Conducting the general meeting

Klöckner & Co SE processes your personal data to conduct the general meeting to the extent required by law for the purposes provided for in the German Stock Corporation Act. These consist of conducting the general meeting.

This particularly includes the invitation of shareholders, identification of shareholders, communication with shareholders, keeping the share register and carrying out the general meetings, including preparation and follow-up, admission control, keeping the attendance register of shareholders who have attended and those that are being represented, preserving the good order ensuring the proper conduct of the general meeting and the exercising shareholders' rights such as the right to ask questions and cast votes and also counting votes during the general meeting. The legal basis for processing your personal data is Art. 6 (1) (c) GDPR.

2.4 Internet transmission and minutes

Klöckner & Co SE will transmit video and audio recordings of the general debate also to the other areas of the presence zone as well as internally to the adjoining rooms of the event (back office) and via the online service for shareholders. There will be no video or audio storage or recording, but verbatim minutes of the entire meeting, including all contributions to the general debate, will be made. The legal basis is Art. 6 (1) (f) GDPR. The legitimate interest pursued is to ensure and document that the general meeting is conducted in a legally compliant and effective manner, and to make it easier for stockholders and other representatives to follow the general debate on site or to enable watch via the online service. The legal basis of the processing for answering questions is Art. 6 (1) (c) GDPR.

2.5 Reporting and analysis of shareholder structure and voting behavior, press and public relations activities

Your personal data will be processed for the purposes of reporting and analyzing the composition of the shareholder structure for the purposes of investor relationship management and for evaluating trends about voting behavior and the development of the transaction process. To the extent necessary and in compliance with applicable legal provisions, limited processing of your personal data will be performed for press and public relations purposes and for communicating with you, in particular, when responding to your inquiries by phone or email. The legal basis for the processing of your personal data is Art. 6 (1) (f) GDPR. The legitimate interests consist of providing the best possible accompaniment to share developments, maintaining relationships with you as a shareholder, and providing you and the public with information.

2.6 Provision of online services

Furthermore, Klöckner & Co SE provides you with online services. The functionalities and services offered by the Online Services include particularly the registration for the annual general meeting, ordering admission tickets, voting by online absentee ballot, issuing authorizations and all instructions to the stake holder representatives of Klöckner & Co SE or intermediaries, shareholders' associations or stock voting rights advisors, the issuance and confirmation of vote counts, the identification when accessing the video broadcast of the annual general meeting for shareholders, digital access to the share register and digital administration of your address in the shareholder register. In addition, the online services offer registration for email delivery of invitations to the general meeting as an alternative to the postal invitation. You can voluntarily choose to receive your invitations in the future at an email address provided by you.

The processing described above is carried out on the basis of your consent pursuant to Art. 6 (1) (a) GDPR. If you no longer wish to use online services in the future or wish to receive digital e-mail invitations to the general meeting by post in the future, you can revoke your consent at any time within your online service settings with effect for the future. Alternatively, please send an email to ir@kloeckner.com or contact the shareholder hotline at + 49 (0)211 8824 5468.

3 Use of Cookies and Processing of Log Data when using the Online Service

When you use the online service on the Internet, technical data about your access is automatically collected. In this process, the following information and device data are temporarily stored in log files (web server log files) and are evaluated exclusively for technical error analysis and to ward off cyberattacks:

- Accessed or requested pages and data
- Date and time of the respective access
- Status message regarding the success of the retrieval
- Browser type and operating system used
- Referrer URL, if sent by your browser
- IP address of your end device
- Port through which access occurs

The legal basis for the integration of local storage and cookies is Section 25 (2) No. 2 of the Telecommunications Digital Services Data Protection Act (TDDDG), as this is necessary to provide the online service you have requested. The further processing of information collected via strictly necessary cookies is based on prevailing legitimate interests pursuant to Art. 6 (1) lit. f) GDPR, in order to provide you with a functional and secure online service.

You can delete data stored in local storage as well as block or deactivate cookies via specific settings in your browser. Please note, however, that the full functionality of the online service cannot be guaranteed in this case. Session cookies and your session ID are deleted at the end of your visit upon proper termination of the session and closing of the browser window.

Cookies and Similar Technologies: "Cookies" are small text files that are placed on your end device, stored by the browser, and read back later. They allow information to be used over a certain period—such as the duration of a session until the browser is closed—to recognize your end device. Similar technologies, such as pixels or local storage, are other technical processes that serve the same purpose as cookies. Regardless of the type of cookies and similar technologies used, you can adjust your selection at any time, provided they are not technically necessary for the presentation of the website.

Overview of Local Storage and Strictly Necessary Cookies

Name	Type	Purpose	Set by	Storage Duration
WebSessionID	Cookie	Support for error analysis / investigation of cyberattacks	kloeckner.hv.adeus.de	Session
JSESSIONID	Cookie	Identification of the user during navigation steps within the application	kloeckner.hv.adeus.de	Session
hideCookieNotice	Local Storage	Controls the hiding/dismissal of the cookie banner	https://kloeckner.hv.adeus.de	6 months
ak_bmsc	Cookie	This cookie is necessary for the Akamai cache function. A cache is used by the website to optimize the response time between the visitor and the website.	.hv.adeus.de	2 hours
bm_sv	Cookie	Akamai Bot Manager / Used to optimize security by distinguishing between humans and bots.	.hv.adeus.de	2 hours

4 To what categories of recipients might your data by relayed? Who has access to your personal data?

Klöckner & Co SE uses the services of external providers to keep the share register and for the technical aspects of the general meeting. Your data is forwarded to Clearstream Europe AG which, as the central securities depository, is responsible for the technical clearing and settlement of securities transactions, as well as for the custody of shares on behalf of credit institutions. Furthermore, it may be necessary to transfer your personal data to further recipients, as far as this is required to fulfill legal obligations.

Additional information for participants of the general meeting:

Your personal data may only be viewed by employees of relevant departments of Klöckner & Co SE who have been entrusted with the conducting the general meeting. In addition, shareholders may, upon request, access the general meetings' list of participants, including your name and place of residence, and, in the case of par value shares, the amount, and in the case of no-par value shares, the number of shares represented by each person, indicating the class. There will be no public broadcast of the general debate.

5 For how long will your data remain stored?

The retention period for data obtained in connection with general meetings, such as the authorization of representatives, usually amounts to three years. The data stored in the share register will be stored for a period of ten years following the sale of shares. Beyond this, Klöckner & Co SE shall retain personal data only if this is necessary in connection with claims asserted against the company (statutory retention period of up to 30 years).

In general, your personal data shall be deleted or anonymized once it is no longer required for the aforementioned purposes and if no other statutory obligations require us to store them in accordance with statutory obligations, in particular in accordance with supervisory, stock corporation, commercial and tax law.

6 What are your rights?

As a data subject, you may contact our Data Protection Officer at any time with an informal request to exercise your rights under the General Data Protection Regulation (GDPR). These rights are the following:

- The right to obtain information about the concerned data processing, as well as a copy of the data processed: You can access essential information stored about you in the share register at any within the optional online services or contact the Data Protection Officer (right of access, Art. 15 GDPR),
- The right to request the rectification of incorrect data or the right to have incomplete data completed (right to rectification, Art. 16 GDPR),
- the right to request the erasure of personal data and, if the personal data have been made public, to inform other data controllers of the request for erasure (right to erasure, Art. 17 GDPR),
- the right to request the restriction of concerned data processing (right to restriction of processing, Art. 18 GDPR),
- the right to receive the personal data of the data subject in a structured, commonly used and machine-readable format and to have the right to request a controller to transfer concerned data to another controller (right to data portability, Art. 20 GDPR),
- the right to object: if your data are processed for purposes of legitimate interests, you may object to this processing at any time at the provided contact address, provided that reasons arise from your particular situation that conflict with this data processing. The data processing shall no longer be processed, unless the company can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject in question, or insofar as the data is processed for the purposes of the establishment, exercise or defense of legal claims (right to object, Art. 21 GDPR),
- **the right to withdraw provided consent at any time in order to terminate data processing operations performed on the concerned consent. The withdrawal shall not affect the lawfulness of the processing based on the consent before its withdrawal (right of withdrawal, Art. 7 GDPR),**
- the right to lodge a complaint with a supervisory authority if you consider that the concerned data processing violates the GDPR. The right to lodge a complaint may in particular be lodged with a supervisory authority of your habitual residence or at the main location of Klöckner & Co SE (right to lodge a complaint with a supervisory authority, Art. 77 GDPR). The data protection supervisory authority responsible for Klöckner & Co SE is the North Rhine-Westphalia State Commissioner for Data Protection and Freedom of Information, Postbox: 20 04 44, 40102 Düsseldorf, Germany.

If you have any questions concerning data protection, please send an email to ir@kloeckner.com or contact the shareholders‘ hotline under +49 (0)211 8824 5468.

Last update of this privacy statement: March 2026

Contact

Group Data Protection Office

Klöckner & Co SE
Peter-Müller-Straße 24
40468 Düsseldorf

Phone: +49 (0) 211 882 450
Email: dataprivacy@kloeckner.com

info@kloeckner.com
www.kloeckner.com

Represented by the Management Board:
Guido Kerkhoff, CEO
Dr. Oliver Falk
John Ganem