

## Information on data protection for Klöckner & Co SE shareholders

The following notes contain information on how your personal information is processed by Klöckner & Co SE, and on your rights pursuant to the data protection laws.

### Who is responsible for the data processing?

**Klöckner & Co SE**, Am Silberpalais 1, 47057 Duisburg, Germany

You can contact the **Data Protection Officer** of Klöckner & Co SE by post at the following address:

**Klöckner & Co SE, Group Data Protection Officer**, Am Silberpalais 1, 47057 Duisburg, Germany  
ADEUS Aktienregister-Service-GmbH, Munich, Germany has been commissioned with maintaining Klöckner & Co SE's share register.

### For what purpose is your data processed, and on what legal basis does this take place? From where does Klöckner & Co SE obtain your data?

Klöckner & Co SE processes your personal data in accordance with the EU General Data Protection Regulation (GDPR), the German Data Protection Act (Bundesdatenschutzgesetz, BDSG), the German Stock Corporation Act (Aktiengesetz, AktG) and all other relevant legal regulations.

The shares of Klöckner & Co SE are no-par value registered shares. For such registered shares, Section 67 German Stock Corporation Act stipulates that they shall be entered in the company's share register stating the name, date of birth and address of the shareholder, as well as the number of shares. The shareholder shall be obligated to provide this information to the company. The banks involved in the purchase, custody or disposal of your Klöckner & Co SE shares regularly relay this, and other information relevant for maintaining the share register (e.g. nationality, gender and remitting bank) to the share register. This is performed via Clearstream Banking Frankfurt, Germany, 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.

Klöckner & Co SE uses your personal data for the purposes defined in the German Stock Corporation Act. These particularly include the maintenance of the share register and holding the annual general meetings. Alongside this, your data may also be used for preparing statistics, for example analysing trends. The legal basis for the processing of your personal data is the German Stock Corporation Act in conjunction with Section 6 para. 1 c) and para. 4 GDPR.

Where necessary, your personal data will also be processed in order to fulfil other statutory obligations, such as regulatory requirements as well as retention obligations imposed by stock corporation, commercial and tax law regulations. For example, in the case where proxy holders appointed by the company are authorized to vote on the shareholder's behalf at the annual general meeting, it is stipulated that the information that serves as evidence of the authorisation be retained for three years in a verifiable access-protected form (Section 134 para. 3 sentence 5 German Stock Corporation Act). The legal basis of the data processing in this case is provided by the relevant statutory regulations in conjunction with Section 6 para. 1 c) GDPR.



In specific cases, Klöckner & Co SE also processes your data for the purpose of protecting legitimate interests in accordance with Section 6 para. 1 f) GDPR. For example, this can be the case with capital increases where information about subscription offers has to be excluded from specific shareholders due to their nationality or domicile, in order to comply with the securities regulations of the countries in question.

If it is proposed to process your data for any other purpose, you shall be notified in advance in accordance with the statutory regulations.

### **To what categories of recipients might your data be relayed?**

External service providers: Klöckner & Co SE uses the services of external providers for maintaining the share register and for the technical aspects of holding the annual general meeting.

Other recipients: In addition, it may be necessary to transmit your personal data to other service providers insofar as this is expedient for the fulfilment of statutory obligations. If you attend the annual general meeting, other Klöckner & Co shareholders may be able to see data pertaining to your person contained in the list of participants prepared in accordance with Section 129 German Stock Corporation Act.

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

The retention period for data recorded in connection with annual general meetings usually amounts to 3 years. The data stored in the share register will, under normal circumstances, be retained for a period of 10 years following the disposal of shares. In addition, 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). As a rule, your personal data shall be deleted or anonymized once it is no longer needed for the aforementioned purposes, and provided statutory documentation and retention obligations do not require Klöckner & Co SE to store such data for a longer period.

### **What are your rights?**

You can visit [www.kloeckner.com/en/online-service.html](http://www.kloeckner.com/en/online-service.html) to view your core personal data as stored in the share register, and correct your address if necessary. You may also use the address of the Data Protection Officer mentioned above to request information concerning all your personal data as stored by us. Subject to certain conditions, you can also demand that your data be deleted, or that the processing activities be restricted.

#### **Right to object:**

**If your data is processed in order to uphold legitimate interests, you may at any time send a notice to the address of the Data Protection Officer mentioned above, objecting to these processing activities, if there are reasons pertaining to your particular situation which stand contrary to the processing of this data. The data processing activities shall be ceased, unless the company is able to show compelling legitimate grounds which outweigh the interests, rights and freedoms of the person in question, or insofar as the data is processed for the purpose of asserting, exercising or defending legal entitlements.**

If you have any questions concerning data protection in connection with the share register, please contact the shareholders' hotline at [ir@kloeckner.com](mailto:ir@kloeckner.com) or +49 (0) 203-307-2123.

If you have any comments or complaints, you also have the opportunity to contact the aforementioned Data Protection Officer or a data protection regulatory authority. Klöckner & Co SE's competent data protection regulatory authority is:

Landesbeauftragte für Datenschutz und Informationsfreiheit Nordrhein-Westfalen  
Postfach 20 04 44, 40102 Düsseldorf, Germany

This information notice was most recently updated: March 2019  
You will be contacted again in the event of any relevant changes to this information notice.

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Dr. Oliver Falk  
John Ganem

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Chairman of the Supervisory Board:  
Prof. Dr. Dieter H. Vogel

