

## 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, is the controller in accordance with the GDPR and therefore in charge for the data processing explained below.

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

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 and address of the shareholder, as well as the number of shares or the share number. The shareholder shall be 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. 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.

#### 1) Share register, annual general meeting and legal obligations

Klöckner & Co SE processes your personal data to the extent required by law for the purposes pursued in accordance with the German Stock Corporation Act. These particularly include the identification of shareholders, communication with shareholders, managing the share register, carrying out the general meetings, including preparation and follow-up, 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.

The legal basis for processing your personal data is the German Stock Corporation Act, with Section 118 et seq. AktG, as well as Art. 6 (1) (c) GDPR.

Your personal data may also be processed for the purpose of complying and reviewing other legal obligations, such as regulatory requirements and obligations under stock corporation, commercial and tax law, as well as for compliance with securities law provisions. This is necessary, for example, 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, in individual cases, (special) categories of personal data are processed for the assertion, exercise and defense of legal claims.

The legal basis for the processing is Art. 6 (1) (c) GDPR and Art. 9 (2) (f) GDPR.

#### 2) Reporting and analysis of the 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 with regard to 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.

### 3) Provision of online services

Furthermore, Klöckner & Co SE provides you with online services. The functionalities and services offered by the Online Services include voting by online absentee ballot, issuing authorizations and all instructions to the stakeholder representatives of Klöckner & Co SE or intermediaries, shareholders' associations or stock voting rights advisors, digital access to the share register and digital administration of your address. In addition, the online services offer email delivery 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 the online services in the future or wish to receive the 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](mailto:ir@kloeckner.com) or contact the shareholder hotline at +49 (0) 203-307 2290.

Should you decide to use or already use email delivery, Klöckner & Co SE will conduct a prize draw for shareholders. The winners of the prize draw will be contacted for the purpose of prize delivery. The processing is carried out for the performance of a contract to which the data subject is a party pursuant to Art. 6 (1) (b) GDPR.

For further information on the prize competition, please refer to the instructions for the prize competition, available online at: <https://www.kloeckner.com/de/investoren/hauptversammlung.html>.

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

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

Other recipients: In addition, it may be necessary to transmit your personal data to other service providers insofar as this is required for the fulfilment of statutory obligations. If you attend the general meeting, other Klöckner & Co shareholders may be able to access data recorded about you in the list of participants as required by Section 129 German Stock Corporation Act.

## **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.

## **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 time 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 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](mailto:ir@kloeckner.com) or contact the shareholders' hotline under +49 (0) 203-307 2290.

## **How can you contact the Data Protection Officer of Klöckner & Co SE with questions or requests regarding data protection?**

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

**Klöckner & Co SE, Group Data Protection Officer**, Am Silberpalais 1, 47057 Duisburg, Germany  
 Email: [dataprivacy@kloeckner.com](mailto:dataprivacy@kloeckner.com)

This information notice was most recently updated: March 2023  
 You will be contacted again in the event of any relevant changes to this information notice.