

## Mandatory information pursuant to the General Data Protection Regulation (GDPR) for shareholders and participants of the Annual General Meeting of HeidelbergCement AG

### 1. Information about specific processing activity

Name and contact details of the controller	HeidelbergCement AG, Berliner Strasse 6, 69120 Heidelberg, Germany, Telephone: +49 6221-481-0 Fax: +49 6221-481-13217, email: info@heidelbergcement.com
Contact details of the data protection officer	HeidelbergCement AG, Data Protection Officer, Berliner Straße 6, 69120 Heidelberg, Germany, Telephone: +49 6221-481-39603 email: data.protection@heidelbergcement.com
Categories of personal data subject to the processing activity	1. Shareholders: First and last name, address, number of shares, number of admission ticket  2. Proxies: First and last name, address, number of shares, number of admission ticket  3. Guests: First and last name, address, company if applicable; media representatives: Additionally the information on the press card (photo, first and last name, address, nationality, date of birth, place of birth) and email address
Source of the personal data	Ad 1 above: from the financial or credit institutes or from the shareholder himself/herself  Ad 2 above: from the shareholder or from the proxy concerned  Ad 3 above: from the data subject himself/herself
The personal data is processed for the following purposes	a. to prepare and execute the Annual General Meeting (processing of registration and attendance at Annual General Meeting)  b. to communicate with the participants  c. to document the Annual General Meeting  d. to fulfill supervisory provisions, to fulfill commercial and tax retention obligations, to fulfill provisions pursuant to the Stock Corporation Act  e. to carry out analyses and statistics related to the Annual General Meeting

	<p>f. to prevent illegal activities (firstly, in connection with the execution of shareholders' rights, but also to prevent unauthorized access to/attendance at the Annual General Meeting)</p>
<p>Legal basis for the data processing of the purposes mentioned under a.–f.</p>	<p>Legal basis for the data processing under</p> <p>a. above is: Art. 6(1) c) GDPR in conjunction with the Stock Corporation Act (Sections 118 ff. AktG) as well as Art. 6(1) a) GDPR for guests (press representatives)</p> <p>b. above is: Art. 6(1) c) GDPR in conjunction with the Stock Corporation Act (Sections 118 ff. AktG), in case that facts are mandatory to be resolved or Art. 6(1) f) GDPR, in case that communication is not required on legal grounds, but serves the cause. The legitimate interest of the controller as a rule is to provide an additional service to the Annual General Meeting's participants (information about the Annual General Meeting, answering the shareholders' questions) and thus ensuring a smooth execution of the Annual General Meeting.</p> <p>c. above is: Art. 6(1) c) GDPR in conjunction with the Stock Corporation Act (Sections 118 ff. AktG) as far as legal documentation requirements exist or Art. 6(1) f) GDPR insofar as the controller has a legitimate interest in the Annual General Meeting's documentation. The controller's legitimate interest in these cases is as a rule to maintain information about the Annual General Meeting in order to keep legal evidence for the Annual General Meeting's participants or third parties.</p> <p>d. above is: Art. 6(1) c) GDPR in conjunction with the respective specific statutory regulations</p> <p>e. above is: Art. 6(1) f) GDPR. The controller's legitimate interest is to identify developments, to act on them and to manage the company accordingly. Moreover, the Annual General Meeting's analysis of the processes and contents serves the quality assurance and optimization of the company processes.</p> <p>f. above is: Art. 6(1) sentence 1 f) GDPR. The controller's legitimate interest is to protect the company, data subjects and third persons from illegal activities and from physical, material or immaterial damage.</p>
<p>Recipient or categories of recipients of the personal data</p>	<ul style="list-style-type: none"> <li>▪ Controller</li> <li>▪ External service providers (e.g. service providers for organizing the Annual General Meeting, notaries, lawyers, auditors)</li> </ul>

	<ul style="list-style-type: none"> <li>▪ Other shareholders</li> <li>▪ Authorities, if necessary</li> </ul>
<p>Necessity of the data collection</p>	<p>For shareholders and proxies, there is a legal obligation to provide the personal data. Without the provision of the personal data, the shareholders' rights cannot be exercised. For guests there is no legal obligation to provide the personal data. The data provision, however, is required for the execution of the above mentioned purposes (especially the purpose mentioned under f.) Without the provision of the personal data, guests cannot participate at the Annual General Meeting.</p>
<p>Place of processing and transmission to third countries</p>	<p>The data will be processed in Germany.</p> <p>The service providers commissioned with the execution of the Annual General Meeting are based in Germany.</p> <p>Data must be, if necessary, also transmitted to foreign authorities, insofar as it is based on legal grounds.</p> <p>Hence, the above mentioned recipients may also be based in countries outside the European Economic Area ("third countries"). In third countries, the data protection level may possibly not guaranteed to the same extent as in the European Economic Area. If data is transmitted to a third country, we ensure that the transmission thereof is executed only in accordance with the statutory provisions (Chapter V GDPR).</p>
<p>Duration for which the personal data are stored</p>	<ul style="list-style-type: none"> <li>▪ Guest data will be deleted 1 month after the execution of the Annual General Meeting</li> <li>▪ Registration and participants list as well as other lists or documents created in connection with the execution and organization of the Annual General Meeting which contain personal data and no longer require being stored according to legal provisions will be deleted 2 years after the Annual General Meeting's execution.</li> <li>▪ In individual cases, data will be stored for a longer period in case the controller has legitimate interest in storing the data beyond the above mentioned period (e.g. prevention or pursuit of legal claims).</li> <li>▪ 10 years as far as legal retention obligations exist.</li> </ul>

## 2. Your rights as data subject

As a data subject, you may contact our data protection officer at any any time with an informal message under the contact data mentioned above, in order to exercise your rights in accordance with GDPR. These rights are as follows:

- the right to obtain information about the data processed as well as a copy of the data processed (Right of access, Art. 15 GDPR),
- the right to request rectification of inaccurate data or completion of incomplete data (Right of rectification, Art. 16 GDPR),
- the right to request erasure of personal data and in case that personal data was made public, the information to other controllers about the erasure request (Right of erasure, Art. 17 GDPR),
- the right to request restriction of processing (Right to restriction of processing, Art. 18 GDPR),
- the right – in the event that the conditions set out in Art. 20 GDPR are met – to receive the personal data concerning yourself in a structured, commonly used and machine-readable format and the right to transmit those data to another controller for processing (Right to data portability, Art. 20 GDPR),
- the right, on grounds relating to your particular situation, to object at any time to processing of personal data concerning yourself which is based on Art. 6 (1) sentence 1 f) GDPR, with future effect (Right to object, Art. 21 GDPR); in such case, the controller no longer processes your personal data, unless the controller demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms, or for the establishment, exercise or defence of legal claims.
- the right to withdraw a consent at any time in order to prevent data processing which is based on your consent. The withdrawal of consent shall not affect the lawfulness of processing based on the consent prior to the withdrawal (Right to withdrawal, Art. 7(3) GDPR),
- the right to lodge a complaint with a supervisory authority in accordance with Art. 77 GDPR. Pursuant to which you shall without prejudice to any other administrative or judicial remedy, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement, lodge a complaint, if you consider that the processing of personal data relating to you infringes the GDPR.

The following data protection supervisory authority is responsible for the controller:  
Landesbeauftragter für Datenschutz und Informationsfreiheit Baden-Württemberg  
Königstraße 10a, 70173 Stuttgart,  
[poststelle@ldi.bwl.de](mailto:poststelle@ldi.bwl.de)

Online-claim form:

<https://www.baden-wuerttemberg.datenschutz.de/online-beschwerde/>

You are also welcome to contact us first. In a telephone call, as you know, many things can be clarified.

**Ihre HeidelbergCement AG**