

1. Organization of data protection and allocation of areas of responsibility for data protection

CompuGroup Medical SE & Co. KGaA (hereinafter also referred to as CGM) considers the responsible handling of and respect for the protection of personal data to be a top priority. The division always ensures exact compliance with all relevant laws when storing and processing personal data.

CGM has implemented a central data protection management system that ensures a uniform and high level of protection for personal data within all CGM companies and ensures compliance with the relevant data protection laws.

With this Privacy Policy we fulfill our information obligations and provide you with information about the handling of data at CGM. This data protection statement relates to the virtual general meetings of CGM SE & Co. KGaA.

The most current version of this data protection statement can always be found on the group website in the Investor Relations/Annual General Meeting section..

2. Processing of personal data in the investor portal

When you access the investor portal, your browser transmits certain information to CGM for technical reasons in order to provide you with the information you require. In order to enable you to visit the pages of the shareholder portal, the following information is collected, stored for a short period of time and used:

- IP address
- Date and time of the retrieval
- Message as to whether the retrieval was successful
- Content of the request (specific page)
- Type of web browser used
- Referrer URL (the previously visited page)

In order to protect the legitimate interest of CGM, the above information is stored for a limited period of time so that in case of unauthorized access or attempted access to the CGM server, a derivation of the access can be initiated.

Login

To use the investor portal, you need your login data. During the registration process, your login data (shareholder number or access card/proxy card number and password) will be compared with the corresponding data from the share register/investor portal in order to ensure that only authorized persons can access the information available on the investor portal and use the services provided. In addition, the time of registration is recorded.

Before using the investor portal for the first time, you will receive an initial password that you can change in the settings. If you use the "Forgotten password" function, we process the following data to recover the forgotten password:

- Shareholder number or admission ticket/proxy card number
- E-mail address

The use of your e-mail address for the "Forgotten password" function is based on your prior consent, Art. 6 (1) a DSGVO.

Cookies

During your visit to the pages of the investor portal, small files (so-called cookies) are stored in the local memory of your browser.

These cookies are required to ensure the functionality and security of the investor portal.

Specifically, this is a cookie that contains authentication data and so-called session data of a user after logging in to the investor portal, so that the user remains logged in even after switching to another page of the portal and his user-related configuration of portal functions (e.g. the selected language) is retained during the session.

Furthermore, for security reasons, a cookie is set which ensures that the respective account is automatically logged out after 30 minutes of inactivity.

The cookies used and temporarily stored in the cache of your browser are so-called **session cookies**, which are automatically deleted after the end of your online session.

You can also delete the cookies before the end of your online session by going to "History" or "Local data" (varies depending on the browser) in your browser settings and deleting the cookies there. However, if cookies are deleted during use, the functionality of the investor portal cannot be guaranteed.

Registration for electronic delivery of Annual General Meeting documents

In the investor portal you have the option of agreeing to receive the documents relating to the Annual General Meeting exclusively by electronic means in the future. To send you the documents, we collect and use the e-mail address you provided when registering or the e-mail address that your custodian bank sent us to the share register on the basis of the consent you provided in advance.

3. Processing of personal data by CGM

CompuGroup Medical SE & Co. KGaA processes personal data (surname and first name, address, e-mail address, shareholder number, number of shares, class of shares, type of ownership of the shares and number of the admission ticket; if applicable, surname, first name and address of the shareholder representative appointed by the respective shareholder) on the basis of the data protection provisions applicable in Germany in order to enable shareholders and shareholder representatives to exercise their rights in the context of the Annual General Meeting. If applicable, the surname, first name and address of the shareholder representative appointed by the respective shareholder) on the basis of the data protection provisions applicable in Germany in order to enable shareholders and shareholder representatives to exercise their rights at the Annual General Meeting. The data collected is stored in the data center of CompuGroup Medical SE & Co. KGaA in Koblenz. CompuGroup Medical SE & Co. KGaA is represented by the managing directors of the general partner of CompuGroup Medical Management SE. You can reach CompuGroup Medical SE & Co. KGaA under the following contact options:

CompuGroup Medical SE & Co. KGaA
Investor Relations
Maria Trost 21
56070 Koblenz
Phone: +49 (0)261 80000
or e-mail: hv@cgm.com

Since 2020, the shares of the Company have been registered shares. Accordingly, the personal data (name, date of birth, postal address, e-mail address, number of shares, share number and, if applicable, also the amount, nationality) must be deposited in the share register of CGM. The responsible depository of the shareholders reports this data to CGM via Clearstream Banking AG, which, as the central securities depository, is responsible for the technical processing of securities transactions and the safekeeping of the shares for the intermediaries/credit institutions. This

Privacy Policy of

CompuGroup Medical SE & Co. KGaA – virtual Annual General Meetings

data will only be used by CGM within the scope of the purposes provided for in the German Stock Corporation Act.

CompuGroup Medical SE & Co. KGaA stores this personal data for a period of ten years beginning with the end of the year in which the Annual General Meeting took place. In addition, CGM retains personal data only in individual cases if it is required in connection with claims asserted for or against CGM.

The service providers of CompuGroup Medical SE & Co. KGaA (Computershare Deutschland GmbH & Co. KG, Eisenheimerstrasse 61, 80687 Munich, Germany), which are commissioned for the purpose of organizing the Annual General Meeting, including the share register, will only receive such personal data from CompuGroup Medical SE & Co. KGaA only receives personal data that is required for the execution of the commissioned service and processes the data exclusively according to the instructions of CompuGroup Medical SE & Co. KGaA.

Due to statutory notification obligations when statutory voting rights thresholds are exceeded, CGM may be obliged to forward the personal data to authorities (such as BaFin - Bundesanstalt für Finanzdienstleistungsaufsicht). It may also be necessary for CGM to disclose the data to courts or legal advisors insofar as this is necessary for the assertion, exercise or defense of legal claims.

CGM processes the personal data of participating shareholders or proxies (shareholder number, number of shares, name, place of residence, telephone number, e-mail address as well as the time and content of contributions in connection with the exercise of shareholder rights) in connection with the execution of the virtual shareholders' meeting in order to comply with the requirements under stock corporation law. This relates in particular to enabling participation and maintaining the list of participants, enabling the exercise of shareholder rights (voting rights, right to information and to speak, right to object) and publication obligations (requests for additions, countermotions, election proposals and statements are published on the Group's website www.cgm.com/hv with disclosure of the name of the shareholder). In doing so, we comply with the legal basis of the provisions of stock corporation law (in particular sections 67e, 118 et seq. of the German Stock Corporation Act (AktG)) in conjunction with Art. 6 (1) c) of the German Data Protection Regulation (DSGVO).

The personal data of shareholders attending the Annual General Meeting and the data of shareholder representatives must be recorded in a list of participants in accordance with Section 129 (1) sentence 2 AktG.

With regard to the processing of personal data, shareholders and shareholder representatives may request from CompuGroup Medical SE & Co. KGaA information about their personal data pursuant to Article 15 of the GDPR, correct their personal data pursuant to Article 16 of the GDPR, delete their personal data pursuant to Article 17 of the GDPR, restrict the processing of their personal data pursuant to Article 18 of the GDPR, and transfer certain personal data to them or a third party designated by them (right to data portability) pursuant to Article 20 of the GDPR. Shareholders and shareholder representatives may exercise these rights vis-à-vis CompuGroup Medical SE & Co. KGaA free of charge via the aforementioned contact options.

In addition, the shareholders and shareholder representatives have the right to lodge a complaint with a data protection supervisory authority.

4. Technical and organizational measures

CGM takes all necessary technical and organizational security measures to protect your personal data against unauthorized access, unauthorized modification, disclosure, loss, destruction and other misuse. These include internal audits of our data collection, storage and processing practices, as well as security measures to protect against unauthorized access to systems on which we store the data.

To ensure data security, CGM regularly reviews the state of the art. For this purpose, typical damage scenarios are determined, among other things, and the need for protection for individual personal data is then derived and divided into damage categories. In addition, a risk assessment is performed.

Furthermore, differentiated penetration tests are used to regularly review, assess and evaluate the effectiveness of these technical and organizational measures to ensure the security of processing.

5. Communication by e-mail

If you wish to contact CGM by e-mail, we would like to point out that the confidentiality of the transmitted information is generally not guaranteed when using e-mail. The content of e-mails may be viewed by third parties.

6. Implementation

CGM carries out regular and thorough checks to ensure compliance with the regulations contained in this Privacy Policy. In the event that CGM receives formal written complaints, we will contact correspondents regarding the concerns they have expressed with a view to resolving any complaints in respect of use of personal data. CGM commits to cooperating closely with the relevant authorities, including local data protection authorities.

7. Changes to the present Privacy Policy

Please note that this Privacy Policy may be supplemented and amended from time to time. We will provide a more detailed notification in the event of any material amendments. Each version of the present Privacy Policy may be identified on the basis of its date and version status contained in the footer (last updated). We also archive all earlier versions of our data protection regulations. You may view these by making a relevant request to the Data Protection Representative of CompuGroup Medical SE.

8. Responsible for Annual General Meetings

Michael Rauch
CompuGroup Medical SE & Co. KGaA
Maria Trost 21
56070 Koblenz

9. Data Protection Officer

If you have any questions regarding the processing of your personal data, you may contact our Data Protection Officer, who will be able to assist in the case of requests for information or complaints.

Hans Josef Gerlitz
CompuGroup Medical SE & Co. KGaA
Maria Trost 21
D-56070 Koblenz
HansJosef.Gerlitz@CGM.com

10. Competent supervisory authority

The relevant data protection supervisory authority for CGM is:
The Data Protection and Freedom of Information Commissioner for the
State of Rhineland Palatinate
Hintere Bleiche 34
55116 Mainz