

# Privacy Policy of

## CompuGroup Medical SE & Co. KGaA – virtual Annual General Meetings (CONVENIENCE TRANSLATION)



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.

With this Privacy Policy we fulfill our information obligations and provide you with information about the handling of person-related 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..

### 1. Processing of personal data in the shareholder portal by CGM

When you access the Shareholder 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. The legal basis for this processing is therefore Art. 6

(1) f) GDPR.

#### Login

To use the shareholder 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/shareholder portal in order to ensure that only authorized persons can access the information available on the shareholder portal and use the services provided. In addition, the time of registration is recorded.

Before using the shareholder 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

CGM has a legitimate interest in ensuring that shareholders and shareholder representatives unhindered access to the shareholder portal. The use of your e-mail address for the "Forgotten password" function is based on Art. 6 (1) f) DSGVO.

#### Cookies

During your visit to the pages of the shareholder 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 shareholder portal.

Specifically, this is a cookie that contains authentication data and so-called session data of a user after logging in to the shareholder 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 shareholder portal cannot be guaranteed. The legal basis for setting these absolutely necessary cookies, accessing the data stored therein and the associated processing of personal data is Section 25 Paragraph 2 No. 2 TTDSG, as this is necessary to provide the shareholder portal you have requested. The further processing of the personal data collected using the absolutely necessary cookies is necessary to protect our legitimate interest in enabling our shareholders and their authorized representatives to visit our shareholder portal. The legal basis for this processing is Article 6 Paragraph 1 c) GDPR in conjunction with Section 67e Paragraph 1 AktG with regard to shareholders and Article 6 Paragraph 1 f) GDPR with regard to their authorized representatives and guests.

#### Registration for electronic delivery of Annual General Meeting documents

In the shareholder 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. The legal basis for this processing is therefore Art. 6 para. 1 c) GDPR in conjunction with. § Section 67e para. 1, 67 para. 6 sentence 3 AktG, § 49 para. 3 no. 1 lit. d) Alt. 2 WpHG.

### 2. Further processing of personal data by CGM

CGM processes certain 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 as well as other data arising in connection with the Annual General Meeting (e.g. proxy authorizations, requests for information, motions).) CGM is represented by the managing directors of the general partner of CompuGroup Medical Management SE. You can reach CGM 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

## Privacy Policy of

### CompuGroup Medical SE & Co. KGaA – virtual Annual General Meetings (CONVENIENCE TRANSLATION)



responsible for the technical processing of securities transactions and the safekeeping of the shares for the intermediaries/credit institutions. This data will only be used by CGM within the scope of the purposes provided for in the German Stock Corporation Act.

CGM anonymizes or deletes the personal data as soon as it is no longer required for the purposes stated here and legal obligations to provide evidence and retain data (e.g. under the German Stock Corporation Act, Commercial Code or Tax Code) do not require further storage. CGM can store this personal data for a period of up to 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 CGM (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 CGM. All CGM employees and all employees of external service providers who have access to and/or process personal data are obliged to treat this data confidentially. In connection with the preparation, implementation and follow-up of the general meeting, CGM may also transmit personal data to legal advisors, tax advisors or auditors.

Due to statutory obligations (e.g. 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 preparation, execution and follow up 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/agm](http://www.cgm.com/agm) 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).

In connection with the preparation, implementation and follow-up of the Annual General Meeting, CGM may also transfer personal data to legal advisors, tax consultants or auditors, as there is a legitimate interest in organizing the Annual General Meeting in accordance with the relevant legal provisions and obtaining external advice in this regard. The legal basis for this processing is Art. 6 para. 1 f) GDPR.

CGM also processes the personal data to fulfill any statutory reporting and publication obligations. In addition, CGM may also process the personal data to fulfill other legal obligations, such as regulatory requirements or retention obligations under stock corporation, commercial and tax law. In order to comply with the provisions of stock corporation law, for example, when authorizing the proxies appointed by the company for the Annual

General Meeting, the data serving as proof of authorization must be stored for three years in a verifiable manner. The legal basis for the processing in these cases is the respective statutory provisions and Art. 6 para. 1 c) GDPR.

With regard to the processing of personal data, shareholders and shareholder representatives, if the legal requirements are fulfilled, may request from CGM 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 CGM free of charge via the aforementioned contact options.

Insofar as we process your personal data to protect the legitimate interests of CGM or a third party, you are entitled to object to this processing if your particular situation gives rise to reasons that conflict with this data processing. In this case, CGM will cease processing unless it can prove that there are compelling legitimate grounds for processing that outweigh your interests, rights and freedoms, or that the processing serves to assert, exercise or defend legal claims.

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

### 3. Data transfer to non-European countries

If CGM passes on personal data to recipients based in a country outside the European Economic Area (third country), the transfer will only take place if the third country has been confirmed by the EU Commission as having an adequate level of data protection or other appropriate data protection guarantees (e.g. agreement of the standard contractual clauses of the EU Commission).

If shareholders come from third countries, CGM will also send these shareholders information (e.g. invitations to general meetings). If these communications also contain personal data (e.g. applications for general meetings stating the name of the applicant), this data will also be transmitted to third countries. The regulations of the GDPR do not apply directly in third countries. Unless there is an adequacy decision from the EU Commission, there may be a lower level of protection for your personal data in these third countries. A transmission is still necessary in order to inform all shareholders equally, as CGM is not allowed to exempt shareholders from third countries from the information requirement. With the transmission, CGM therefore fulfills its contractual obligations. The legal basis for the transfer is Article 49 Paragraph 1 Letter b) GDPR.

**Detailed information about this and about the data protection level of our service providers in third countries can be requested from the data protection officer.**

### 4. 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.

### 5. 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

## Privacy Policy of

### CompuGroup Medical SE & Co. KGaA – virtual Annual General Meetings (CONVENIENCE TRANSLATION)



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 CGM.

#### 6. Responsible for Annual General Meetings

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

#### 7. 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 the assertion of the rights of those affected or complaints.

Hans Josef Gerlitz  
CompuGroup Medical SE & Co. KGaA  
Maria Trost 21  
D-56070 Koblenz  
[HansJosef.Gerlitz@CGM.com](mailto:HansJosef.Gerlitz@CGM.com)

#### 8. 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