

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

The Annual General Meetings Department is entirely committed to dealing with personal data in a responsible manner and to according all due consideration to data protection requirements. The department works on an ongoing basis to ensure precise compliance with all relevant laws pertaining to the storage and processing of personal information.

CGM SE has introduced a central data management system which creates a uniformly high level of personal data protection within all CGM companies and safeguards adherence to applicable privacy legislation.

The present Privacy Policy fulfils our duty to provide information and notifies you how CGM treats data. This Privacy Policy relates to Annual General Meetings of CGM SE.

The latest version of the Privacy Policy is always available on the group website in the Investor Relations/Annual General Meeting section.

2. Processing of personal data by CGM

In its capacity as a controller within the meaning of Article 4 Clause 7 of the General Data Protection Regulation (“GDPR”), CompuGroup Medical SE processes personal data (surname and first name, postal address, e-mail address, amount of shares held, type of shares held, the way in which shares are held, number of entrance ticket and where relevant the full name and address of any proxies that may have been appointed by a shareholder) on the basis of the data protection stipulations applicable in Germany in order to enable shareholders and proxies to exercise their rights within the scope of the Annual General Meeting. Data collected is stored at the data processing centre of CompuGroup Medical SE in Koblenz. CompuGroup Medical SE is represented by the members of its Management Board. CompuGroup Medical SE may be contacted as follows.

CompuGroup Medical SE
Investor Relations
Maria Trost 21
56070 Koblenz
Telephone: +49 (0)261 8000 6200 or Fax: +49 (0) 261 8000 3200
or e-mail: hv@cgm.com

Insofar as this personal data has not been provided by shareholders within the framework of registration for the Annual General Meeting, the relevant personal information of such shareholders will be communicated to CompuGroup Medical SE by the bank which manages their custody account. Processing of personal data of shareholders and of proxies takes place solely for the reason of implementing their participation in the Annual General Meeting and only to the extent necessary for the achievement of this purpose. The legal basis for data processing is provided by Article 6 Paragraph 1 (c) of the GDPR. CompuGroup Medical SE will store this personal data for a period of ten years beginning from the end of the year in which the Annual General Meeting took place.

Service providers commissioned by CompuGroup Medical SE for the purpose of staging the Annual General Meeting receive from CompuGroup Medical SE only such personal data as is necessary for the execution of the assignment and process such data solely in accordance with the instructions of CompuGroup Medical SE.

In respect of communication of personal data to third parties within the scope of shareholder requests for additional items to be included on the agenda or within the context of counter applications or nominations made

by shareholders, attention is drawn to the explanations contained within the terms and conditions of participation.

Pursuant to Article 15 GDPR, shareholders and shareholder proxies have the right to obtain information from CompuGroup Medical SE regarding personal data held about them. They further have the right to rectification of data pursuant to Article 16 GDPR, the right to erasure of personal data pursuant to Article 17 GDPR and the right to restriction of processing pursuant to Article 18 GDPR. In accordance with Article 20 GDPR, they also have the right to receive certain data concerning them and the right of transmission of data to a third party whom they have stipulated (right to data portability). Shareholders and proxies may use the contact details stated above to assert these rights vis-à-vis CompuGroup Medical SE without incurring any charge.

In addition, Article 77 GDPR accords shareholders and proxies the right to lodge a complaint with a data protection supervisory authority either in the (federal) state in which they are permanently or ordinarily resident or in the Federal State of Rhineland Palatinate, in which the Registered Office of CompuGroup Medical SE is located.

The contact details of our Company Data Protection Officer are as follows.

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

3. Security measures/avoidance of risks

CGM puts all necessary technical and organizational security measures in place in order to protect your personal data against unauthorized access, unauthorized amendments, disclosure, loss, destruction and other forms of misuse. These measures include internal audits of the approach we adopt towards the collection, storage and processing of information and further security measures for protection against unauthorized access to systems on which we store data.

4. Technical and organizational measures

CGM reviews the status of technology on a regular basis in order to ensure data security. Actions undertaken in this regard include the identification of typical damage scenarios, the subsequent extrapolation of protection needs for individual personal data and division of these into damage categories. A risk assessment is also carried out. Differentiated penetration tests continue to be performed in order to investigate, assess and evaluate the effectiveness of technical and organizational measures for the safeguarding of secure processing on a regular basis.

5. Communication by e-mail

If you wish to enter into contact with CGM by e-mail, we wish to point out that confidentiality of information transmitted is not guaranteed. It may be possible for third parties to view the contents of e-mails. We therefore recommend that you should send us confidential information by post only.

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

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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

Mr. Michael Rauch
CompuGroup Medical SE
Maria Trost 21
56070 Koblenz

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
Maria Trost 21
D-56070 Koblenz
HansJosef.Gerlitz@CGM.com

9. Competent supervisory authority

The relevant data protection supervisory authority for CGM Annual General Meetings is:

The Data Protection and Freedom of Information Commissioner for the State of Rhineland Palatinate
Hintere Bleiche 34
55116 Mainz