

Mandatory information pursuant to Art. 13 and 14 of the General Data Protection Regulation (GDPR) for shareholders and participants of the Annual General Meeting of Heidelberg Materials AG

1. Information about specific processing activity

Name and contact details of the controller	Heidelberg Materials AG, Berliner Strasse 6, 69120 Heidelberg, Germany, telephone: +49 6221-481-0 Fax: +49 6221-481-13217, email: info@heidelbergmaterials.com
Contact details of the data protection officer	Heidelberg Materials AG, Data Protection Officer, Berliner Straße 6, 69120 Heidelberg, Germany, telephone: +49 6221-481-39603 email: info.dataprotection@heidelbergmaterials.com
Categories of personal data subject to the processing activity	<p>1. Shareholders: First and last name, address, number of shares, number of registration confirmation, CONCAT-identifier (consisting of: ISO country code, date of birth, first name (5 characters after cleaning), last name (5 characters after cleaning) and – if applicable – further information that is sent to us unsolicited.</p> <p>2. Proxies: First and last name, address, number of shares, number of registration confirmation, email address and – if applicable – further information that is sent to us unsolicited.</p> <p>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 and – if applicable – further information that is sent to us unsolicited.</p> <p>4. If shareholders or their proxies contact us ("enquiry"): personal data that was communicated to us as part of the enquiry and that is required to process or answer the enquiry (e.g. contact details such as name, email address or telephone number). If necessary, we also process information on motions, questions, nominations and requests from shareholders or their proxies at the general meeting as well as personal data in connection with the submission of statements. Statements are published in the InvestorPortal together with the name of the shareholder.</p> <p>5. If shareholders or their proxies register in our InvestorPortal, we process additional personal data within the InvestorPortal in</p>

	<p>addition to the data mentioned in points 1 and 2 of this section, such as password, general Internet log files, necessary cookies, language or other settings, if applicable image and sound transmission (pure live transmission without recording function), etc. When you register in the InvestorPortal, you will receive additional and specific data protection information about data processing in the portal.</p>
Source of the personal data	<p>Ad 1 above: from the financial or credit institutes or from the shareholder himself/herself.</p> <p>Ad 2 above: from the shareholder or from the proxy concerned.</p> <p>Ad 3 above: from the data subject himself/herself.</p> <p>Ad 4 above: from the data subject himself/herself.</p> <p>Ad. 5 above: from the data subject himself/herself, or directly from the devices they use.</p>
The personal data is processed for the following purposes	<p>a. to enable shareholders, proxies and guests to participate in the virtual Annual General Meeting and - in the case of shareholders - to exercise the shareholder rights themselves or through proxies and to prepare, conduct and follow up on the Annual General Meeting. Furthermore, we process the data of shareholders for compliance purposes (sanctions list checking).</p> <p>b. to communicate with the participants within and outside the InvestorPortal.</p> <p>c. to document the Annual General Meeting.</p> <p>d. to fulfill supervisory provisions, to fulfill commercial and tax retention obligations, to fulfill stock legal requirements.</p> <p>e. to carry out analyses and statistics related to the Annual General Meeting.</p> <p>f. to prevent illegal activities (firstly, in connection with the execution of shareholders' rights, but also to prevent unauthorized access to the Annual General Meeting and abusive use of the InvestorPortal).</p>
Legal basis for the data processing of the purposes mentioned under a.–f.	<p>Legal basis for the data processing under</p> <p>a. above is:</p>

- Art. 6(1) c) GDPR (fulfillment of a legal obligation) in conjunction with the German Stock Corporation Act ("AktG") (§ 67e AktG, §§ 118 ff. AktG, in particular § 118 a) AktG in conjunction with the statutes of Heidelberg Materials AG, § 130 a) AktG);

- Art. 6(1) f) GDPR (legitimate interest) in case the data processing is not directly based on a specific legal provision, but is carried out as a result of legal obligations, for example, for sanctions list checking or in cases of the disclosure of shareholders' names when publishing statements on the InvestorPortal pursuant to § 130a AktG;

- Art. 6(1) a) GDPR (consent) for the processing of personal data of guests (e.g. press representatives).

b. above is: Art. 6(1) c) GDPR (fulfillment of a legal obligation) in conjunction with the AktG (§ 67e AktG, §§ 118 ff. AktG), in case that communication is mandatory or facts are mandatory to be resolved or Art. 6(1) f) GDPR (legitimate interest), 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, technical support) and thus ensuring a smooth execution of the Annual General Meeting.

c. above is: Art. 6(1) c) GDPR (fulfillment of a legal obligation) in conjunction with the AktG (§§ 118 ff. AktG) as far as legal documentation requirements exist or Art. 6(1) f) GDPR (legitimate interest) 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 to keep legal evidence for the Annual General Meeting's participants or third parties.

d. above is: Art. 6(1) c) GDPR (fulfillment of a legal obligation) in conjunction with the respective specific statutory regulations (e.g. § 67e AktG).

e. above is: Art. 6(1) f) GDPR (legitimate interest). 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>f. above is: Art. 6(1) f) GDPR (legitimate interest). 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"> ▪ Controller ▪ External service providers (e.g. service providers for organizing the Annual General Meeting, notaries, lawyers, auditors, sanctions list auditor) ▪ Other shareholders or their proxies ▪ If applicable, guests ▪ Authorities, if necessary
<p>Necessity of the data collection</p>	<p>For shareholders and proxies, there is a legal obligation to provide the personal data. In particular, there is a legal obligation to activate video transmission (image and sound transmission) if a shareholder or a proxy wishes to make speeches as part of the virtual general meeting. 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"> ▪ Guest data will be deleted 1 month after the execution of the Annual General Meeting ▪ The other personal data processed in connection with the performance and organization of the Annual General Meeting will be deleted regularly after 3 years after the performance of the Annual General Meeting. However,

	<p>the storage period is up to 10 years, insofar as there are corresponding legal retention requirements for individual records that contain personal data.</p> <ul style="list-style-type: none">▪ In single cases the data are stored for a longer period, in case the controller has a legitimate interest to store the data for a longer period than the aforementioned (e.g. defending against or pursuing legal claims).
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2. Your rights as data subject

As a data subject, you may contact our data protection officer at 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.