



Status February 2025

## Information on data protection with respect to the Annual General Meeting of Henkel AG & Co. KGaA 2025

### General

Henkel AG & Co. KGaA, Düsseldorf (hereinafter referred to as "Henkel"), respects the privacy of every individual. We take data protection for our shareholders and their proxies very seriously. With the following information, we inform you about the processing of your personal data by Henkel and the rights to which you are entitled as a shareholder or its authorized representative under data protection law, in particular under the EU General Data Protection Regulation.

### Who is responsible for data processing?

Henkel AG & Co. KGaA  
Henkelstrasse 67  
40589 Dusseldorf  
Phone: +49 211 797-2137  
Fax: +49 211 797-12137

### For what purposes and on what legal basis is your data processed? From whom do we receive your data?

We process your personal data in compliance with the EU General Data Protection Regulation (DSGVO), the German Federal Data Protection Act (BDSG), the German Stock Corporation Act (AktG) and all other relevant legal regulations.

All Henkel shares - ordinary and preferred - are bearer shares. Unlike registered shares, Henkel does **not** maintain a share register within the meaning of Section 67 of the German Stock Corporation Act (AktG) showing the name, date of birth and address of the shareholder and the number of shares held.

We process personal data (such as name, address, number of shares, class of shares, type of ownership of shares, and access card number) on the basis of applicable data protection laws in order to enable shareholders to participate in and exercise their rights at the virtual Annual General Meeting.

Henkel AG & Co. KGaA broadcasts the Annual General Meeting (in part) on the Internet via the Henkel InvestorPortal and enables shareholders to exercise their rights via the Henkel InvestorPortal. In this context, personal data of shareholders may be processed. In addition, data processing may take place that is necessary for the organization of the Annual General Meeting. The legal basis for this processing on the basis of overriding legitimate interests is Article 6 (1) lit. f) DSGVO. Henkel AG & Co. KGaA generally receives the personal data of shareholders via the registration office from the credit institution that the shareholders have entrusted with the safekeeping of their shares (so-called custodian bank). In some cases, Henkel AG & Co. KGaA may also receive personal data directly from shareholders.

The service providers of Henkel AG & Co. KGaA commissioned to prepare and conduct the Annual General Meeting receive from Henkel AG & Co. KGaA only such personal data as are necessary for the performance of the commissioned service and process the data exclusively in accordance with the instructions of Henkel AG & Co. KGaA and only to the extent necessary for the performance of the commissioned service. All employees of Henkel AG & Co. KGaA and the employees of the contracted service providers who have access to and/or process personal data of shareholders or shareholder representatives are obliged to treat such data confidentially. Furthermore, personal data relating to

shareholders or shareholder representatives attending or being represented at the Annual General Meeting will be made available to other shareholders and shareholder representatives within the framework of statutory provisions (in particular via the list of participants, Section 129 AktG).

The processing of your personal data is technically and legally necessary for the exercise of your rights at the Annual General Meeting, in particular for the exercise of voting rights, as well as for its implementation. The legal basis for the processing of your personal data is Section 118 et seq. AktG in conjunction with Article 6 (1) c) DSGVO.

In addition, we may also process your personal data in order to comply with other legal obligations, such as regulatory requirements and obligations under stock corporation, securities, commercial and tax law. In order to comply with the provisions of stock corporation law, we must, for example, when authorizing the proxies appointed by Henkel for the Annual General Meeting, verifiably record the data serving as proof of the authorization and store it for a period of 3 years in a manner protected from access (Section 134 (3) Sentence 5 AktG). In this case, the legal basis for processing is provided by the relevant statutory provisions in conjunction with Article 6 (1) c) DSGVO.

In addition to processing based on legal requirements, we also process personal data to protect our legitimate interests under Article 6(1) f) DSGVO:

We have a legitimate interest in ensuring that the Annual General Meeting is held and proceeds in an orderly manner.

If you exercise your rights in accordance with the invitation to the Annual General Meeting, we will process your name and address and the number of your access card. If you authorize a third party to attend the Annual General Meeting, we also process the name and address of the authorized representative in order to ensure that the Annual General Meeting is conducted properly. The legal basis for this is the relevant provisions of stock corporation law in conjunction with Article 6 (1) c) DSGVO.

A legitimate interest also exists with regard to compliance with non-European securities regulations, e.g. if we have to exclude individual shareholders from information on subscription offers in the case of capital increases due to their nationality or place of residence in order to comply with corresponding regulations.

Should we wish to process your personal data for a purpose not mentioned above, we will inform you of this in advance within the framework of the legal provisions.

## **To which categories of recipients do we disclose your data, if any?**

### ***Internal:***

Within Henkel AG & Co. KGaA, access to your data is granted to those persons who need it in order to perform our duties towards you.

### ***External service providers:***

For the preparation and conduct of the Annual General Meeting, we sometimes use external service providers (AGM service providers, service providers for the printing and dispatch of the legally required shareholder notices). The service providers of Henkel AG & Co. KGaA engaged for the purpose of preparing and conducting the Annual General Meeting receive from Henkel AG & Co. KGaA only such personal data as are required for the performance of the service engaged and process the data exclusively in accordance with the instructions of Henkel AG & Co. KGaA. If such service providers come into contact with personal data of our shareholders, this is done within the framework of so-called commissioned processing, which is expressly permitted by law (Article 28 DSGVO).

### ***Other recipients:***

If you or a person authorized by you attend the Annual General Meeting, other Henkel shareholders may, in accordance with Section 129 (1) sentence 2 AktG, inspect any data relating to you or your proxy recorded in the register of attendees. Henkel shareholders may also request to inspect the register of participants for up to two years after the Annual General Meeting.

We also transfer your data - if necessary and permissible - to other recipients who process your data on their own responsibility. These are, for example, authorities for the fulfillment of statutory notification obligations (for example, when statutory voting rights thresholds are exceeded).

## **How long do we store your data?**

As a matter of principle, we anonymize or delete your personal data as soon as it is no longer required for the above-mentioned purposes, unless we are obliged to continue storing it under statutory obligations to provide proof and to retain data (e.g. in the German Stock Corporation Act (AktG), the German Commercial Code (HGB), the German Fiscal Code (Abgabenordnung)). For data collected in connection with Annual General Meetings, the storage period is regularly up to 3 years. Beyond this, we only retain personal data in individual cases if this is necessary in connection with claims asserted against our company.

## **What rights do you have as a data subject?**

You can request information about the data stored about you at the above address. In addition, you can, under certain conditions, request the deletion and correction of your data or a restriction of processing (e.g. if your data is processed unlawfully).

You can exercise your right to information at any time. In addition, you have the following further rights if the respective requirements are met:

- Right of rectification
- Right to delete
- Right to restriction of processing
- Right to data portability
- Right to lodge a complaint with the relevant data protection supervisory authority:

Landesbeauftragte für Datenschutz und Informationsfreiheit Nordrhein-Westfalen  
Kavalleriestr. 2-4  
40213 Düsseldorf  
Phone: +49 211 38424-0  
Fax: +49 211 38424-10  
E-mail: [poststelle@ldi.nrw.de](mailto:poststelle@ldi.nrw.de)

To exercise your rights, or if you have any other questions regarding your personal data, please send an e-mail or letter to our data protection officer, Mr. Frank Liebich, Henkel AG & Co. KGaA, Henkelstrasse 67, D 40191 Düsseldorf (e-mail: [datenschutz@henkel.com](mailto:datenschutz@henkel.com)).

**Right to object**

**In the event that your personal data is processed on the basis of a legitimate interest of Henkel, you have the right to object to the processing of your personal data at any time on grounds relating to your particular situation. Henkel will stop the processing unless Henkel can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or if the processing serves to assert, exercise or defend legal claims.**

**Further information on financial instruments issued by Henkel**

Company:	Henkel AG & Co. KGaA
Postal address:	40191 Düsseldorf, Germany
Henkel preferred share:	ISIN DE0006048432 // WKN 604843
Henkel ordinary shares:	ISIN DE0006048408 // WKN 604840
Stock exchanges:	Regulated market (Prime Standard) on all eight German stock exchanges

For further financial instruments, see [www.henkel.de/ir](http://www.henkel.de/ir)