

Data Processing Information for Shareholders of MLP SE

Controller and Contact Data

The controller for the processing of data is MLP SE, Alte Heerstrasse 40, 69168 Wiesloch, Germany.

Contact MLP SE:

MLP SE, Alte Heerstrasse 40, 69168 Wiesloch, Germany

E-mail: investorrelations@mlp.de

Data and purposes

MLP SE processes names and contact data as well as data related to shares owned by MLP SE shareholders or, as applicable, their representatives for the purposes as foreseen in the *Aktiengesetz, AktG* (German Stock Corporation Act), namely, communication with shareholders and, in particular, in connection with the preparation and carrying out of the virtual Annual General Meeting. When using the password-protected shareholder portal, the personal data of shareholders and shareholder representatives (login information for the shareholder portal, IP address and session data, server log files and registration confirmation number) is also processed for the purpose of making the portal technically available and ensuring the smooth running of the virtual Annual General Meeting.

In addition, MLP processes your personal data to exercise your shareholder rights in connection with the virtual Annual General Meeting.

Furthermore, data related to a shareholder's and shareholder representative's attendance at the Annual General Meeting is collected and processed. The details related to shareholders who attend the Annual General Meeting can be inspected by all shareholders on the basis of Section 129 (4) AktG in the list of attendees kept by the company.

Legal Basis

The legal basis for the presented processing of personal data is Art. 6 (1) sentence 1 (c) GDPR (General Data Protection Regulation) as well as Section 1 (2) sentence 1, No. 2 - 4 of the German Law on Measures in Company, Cooperative, Association, Foundation and Residential Property to Mitigate the Consequences of the COVID-19 Pandemic. The legal basis for the operation of the password-protected shareholder portal is Art. 6 (1) sentence 1 (f) GDPR to ensure the smooth running of the virtually conducted Annual General Meeting and the possibility of exercising your rights as a shareholder.

Insofar as you make use of the possibility as shareholder of submitting questions and your questions are handled in the Annual General Meeting, this is always done under your name. This can be noted by other attendees of the virtual Annual General Meeting. The legal basis for this

processing is Art. 6 (1), sentence 1 (f) GDPR. You can object to indication of your name with formulation of the question by means of the password-protected shareholder portal.

In the aforementioned context, the shareholders' data shall also be used for overviews such as, for example, the representation of the shareholder development, of transactions or the presentation of the largest shareholders. The legal bases are Art. 6 (1) sentence 1 (c), (4) GDPR in connection with the AktG.

The data is also processed in order to comply with legal requirements (such as mandatory tax, commercial or stock corporation law data storage periods or special regulatory requirements). For example, Section 134 (3) sentence 5 AktG regulates that, where representatives exercising voting rights who have been named by the company are authorised, the company is to keep a verifiable record of the declaration of power of attorney for three years.

On the basis of Art. 6 (1) sentence 1 (f) GDPR, we process shareholders' data also to safeguard the legitimate interests of the company such as, for example, for limitations with shareholders' information related to subscription offers in conjunction with a capital increase for purposes of compliance with securities legislation of certain non-European countries.

MLP SE issues ordinary bearer shares and thus keeps no share register. With acquisition and sale of MLP SE shares, the technical processing including the transmission of data to us takes place via Clearstream Banking AG, Frankfurt a. M., as the central securities depository for the credit institution (depot banks).

Recipients

MLP SE uses external service providers to carry out its Annual General Meetings (e.g. Computershare Deutschland GmbH & Co. KG, Munich, Germany as the annual general meeting service provider and supplier of the password-protected shareholder portal, service provider for legal advice, service provider for print and dispatch of shareholder notifications). Additional recipients of shareholders' and shareholders representatives' personal data are in particular public authorities for the purpose of compliance with statutory notification obligations. In cases of requests for agenda additions as well as counter-motions and nominations for elections, these shall be made available to the public.

Erasure Periods

Login information for the shareholder portal, IP address and session data are deleted after the website is closed,

server log files after 32 days. Upon expiry of the statutory data storage and record-keeping obligations, the shareholders' personal data shall be anonymised or erased, unless further storage, possibly due to pending litigation, is necessary. Data storage periods in connection with annual general meetings are generally up to three years. Longer data storage periods of up to ten years can be required by the *Handelsgesetzbuch* (German Commercial Code) and the *Abgabenordnung* (German Tax Code).

Rights as Data Subject

Right of access, erasure, rectification, restriction: MLP SE shareholders have the right to information to be provided where personal data are collected from the data subject as well as rectification or erasure or restriction of the processing if the necessary statutory prerequisites are met.

Objection to processing on the basis of legitimate interests: If your data is processed for purposes of

legitimate interests, you can object to this processing at any time if reasons exist due to your own specific situation which override this data processing.

Right to Lodge a Complaint: You have the possibility of lodging a complaint with a data protection supervisory authority; the supervisory authority responsible for MLP SE is:

Landesdatenschutzbeauftragter für den Datenschutz Baden-Württemberg (State Commissioner for Data Protection of Baden-Württemberg), Königstrasse 10a, 70173 Stuttgart, Germany; Telephone: + 49 (0)711 / 61 55 41 – 0; E-mail: poststelle@lfdi.bwl.de

You can find additional information related to data protection at MLP SE here: <https://mlp-se.de/mlp-se/datenschutz/>.

Information as of: June 2020