

Information on data protection regarding the Annual General Meeting

1) General information

a) Introduction

FUCHS PETROLUB SE ("FUCHS," "We," "Us," "Our") is firmly committed to protecting your data. The following remarks will provide you with information about the collection and processing of your personal data and your rights in this regard under Regulation (EU) 2016/679 (General Data Protection Regulation - GDPR), the German Federal Data Protection Act (BDSG), Regulation (EC) No. 2157/2001 on the Statute for a European Company (SE-Reg.), the German SE Implementation Act (SEAG) and the German Stock Corporation Act (AktG) in relation to the preparation, performance, and follow-up of the Annual General Meeting of FUCHS as an Annual General Meeting without the physical presence of the shareholders and proxies. In addition, representatives of the broadcast, print or online press ("journalists") and guests admitted by FUCHS may be present.

In connection with the Annual General Meeting, FUCHS also offers an InvestorPortal. The **InvestorPortal** is accessible only to shareholders and their proxies who have the required access details, as well as to FUCHS, to any service providers of FUCHS that are employed for the implementation of the Annual General Meeting, and to journalists who have been admitted by FUCHS. The **InvestorPortal** is available online at **www.fuchs.com/annualmeeting**; in addition to the information in this document, please also note the data privacy information that is available at this address (<https://www.fuchs.com/group/data-privacy/>). The **InvestorPortal** is used exclusively to provide the functions described in the invitation to the Annual General Meeting (see sections II.3, III.6, III.7, III.8, III.9 and III.11 – individually and collectively "InvestorPortal functions").

b) Data processing controller as defined in Art. 4 No. 7 GDPR

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Email: kontakt@fuchs.com

Website: <https://www.fuchs.com/group>

c) Contact information for the data protection officer

Dr. Karsten Kinast, LL.M.
KINAST Rechtsanwaltsgesellschaft mbH
Hohenzollernring 54
50672 Cologne, Germany
Email: mail@kinast-partner.de

2) Personal data affected

a) General

We process the following personal data of participating shareholders, proxies, guests and journalists; not all of the personal data listed is processed for all of the data subjects listed.

- Full name
- Address
- Phone number
- Email address
- Number of shares, share class, and type of shareholding
- Access details for entry to the **InvestorPortal**
- Any voting rights issued to a proxy

If shareholders or their proxies get in touch with us ("query"), we will also process the personal data that is given to us in the context of the query and that is needed in order to answer the query (e.g. the contact details such as email address or telephone number given by the shareholder or proxy). Where necessary we will also process information about motions, questions, objections, nominations, and requests from shareholders or their proxies in the Annual General Meeting.

Please note there is a possibility that your personal data included in your inquiries – particularly your name – may be shared openly during the meeting in accordance with this privacy statement, and thus may also be observed by the journalists in attendance. In the context of answering questions, the Executive Board reserves the right to specify the shareholder asking the question by name or to state personal data openly during the meeting, provided the shareholder asking the question consented to being mentioned by name when the question was submitted or that one of the justifications stated in Section 3 (last paragraph) below exists.

If we do not receive the above data directly from the respective shareholder, it will be provided to us by custodian banks / intermediaries.

b) InvestorPortal

When you visit our **InvestorPortal**, we also collect the following data, which is logged in the web server log files and automatically transmitted to us by your browser when you visit the **InvestorPortal**:

- retrieved or requested data;
- date and time of the respective retrieval;
- notice as to whether the respective retrieval was successful or not;
- content of the respective request (i.e. the specific page retrieved);
- web browser used (type);
- uniform resource locator ("URL") of the previously visited website (referrer URL);
- IP address
- your shareholder/proxy card number and session ID.

Furthermore, we use so-called web storage functions for your use of the **InvestorPortal**, which are described in more detail in this paragraph. Small text files are stored locally in the memory of your browser on your terminal device. After you log in to the **InvestorPortal**, we collect information about your respective authentication token (i.e. your "virtual admission ticket") and your session data (so-called "session data"), including your consent to the terms of use for the **InvestorPortal**. This enables you to be recognized as a user if you need to switch to another page of the **InvestorPortal** or reload the page

during an active session on the **InvestorPortal**. When you close your browser, such data is automatically deleted. In addition, we use the so-called local storage function when you use the **InvestorPortal**. This is used to enable you to use the webcast of our Annual General Meeting and to store the time stamp of your login to the **InvestorPortal**. This is necessary to enable an automatic logout after a predefined period of inactivity for security reasons. In the operating information for your browser, you will find information on how you can technically prevent the use of the functions described in this paragraph and how you are notified by your browser about the placement of new web storage elements. Please note that some functions of our **InvestorPortal** may no longer be available if you deactivate web storage functions in your browser.

In addition, we use the following technically necessary cookies for the provision of media content (in particular for the webcast of the Annual General Meeting) in our **InvestorPortal**:

Name of Cookie	Description and Purpose of Cookie	Storage period
PHPSESSID	Standard session identifier for PHP; session cookie to enable basic website functions such as page navigation and access to secure areas of the website.	For the duration of the respective session.

Cookies are small files that are stored on your end device by a website that you visit (here: our **InvestorPortal**). They enable us, for example, to recognize whether there has already been a connection between your end device and our media content. You can set your browser's operating functions so that you are informed when cookies are set and so that you must always allow cookies to be set individually, define that cookies are only allowed to be set in certain cases or that cookies are generally not allowed to be set; you can also set your browser in a way so that cookies are automatically deleted when you close the browser. Please note that a complete or partial exclusion of the use of cookies can lead to the fact that not all functions of our Investor Portal are available to you - completely or partially.

3) Purpose and legal basis of data processing

We process the personal data for the following purposes:

- For participation in, preparation for, and performance of the Annual General Meeting (such as review of the applications for registration for the Annual General Meeting, sending the access details for the **InvestorPortal** and provision of the **InvestorPortal-Functions**).
- To fulfill the requirements under stock corporation law (such as for creating the list of participants, for meeting documentation requirements).
- To allow the exercise of shareholder rights (e.g. ability to ask questions electronically, voting via electronic absentee ballot, responses to inquiries).
- To communicate with the authorized shareholders and proxies of the Annual General Meeting.
- To prevent and identify illegal activities.

The legal basis for processing personal data includes the provisions of SE-Reg. (Art. 52 et seq.) and the stock corporation laws (in particular Sections 67e, 118 et seq. AktG), each in conjunction with Art. 6 (1) Sentence 1 c) GDPR. Insofar as the participation of guests in the Annual General Meeting is concerned, the legal basis for the data processing is our

legitimate interest in enabling access to the Annual General Meeting and the **InvestorPortal** only for selected guests (Art. 6 (1) sentence 1 f) GDPR).

In addition, we will process personal data to comply with legal requirements under supervisory, tax, and commercial law. Art. 6 (1) Sentence 1 c) GDPR is also the legal basis here.

We will also process personal data to safeguard legitimate interests, such as preparing the Annual General Meeting and ensuring that the Annual General Meeting runs smoothly, or complying with securities trading regulations of non-European countries. The legal basis for data processing in these cases is Art. 6 (1) Sentence 1 f) GDPR.

If you provide us with personal data in connection with a query, the legal basis for processing this data for the purposes of replying is Art. 6 (1) Sentence 1 a) GDPR.

If we have sent you the invitation to the Annual General Meeting by means of remote data transmission (e.g. by e-mail), the legal basis is your consent (i) which you have not expressly revoked or (ii) which you have declared by not objecting to a request for consent in text form within a reasonable period of time and by not revoking the consent thereby deemed to have been granted at a later point in time, Section 49 (3) No. 1 lit. d of the German Securities Trading Act (WpHG), Art. 6 (1) Sentence 1 a) GDPR.

When FUCHS is answering questions, the name of the shareholder asking the question may be specified if the relevant shareholder asking the question has consented to this, a statutory obligation to do so exists, or doing so is necessary in order to answer the question or is otherwise in the legitimate interest of the company (legal basis: Art. 6 (1) Sentence 1 a), c), and/or f) GDPR).

Insofar as we use web storage functions and/or cookies as part of the **InvestorPortal** (see Section 2.b above), which are absolutely necessary for the provision of the **InvestorPortal**, the legal basis for their use and the associated processing of personal data is Section 25 (2) no. 2 German Act on Data Privacy in Telecommunication and Telemedia (TTDSG). The further processing of the access data and end device information collected by means of the aforementioned cookies and web storage functions is necessary to safeguard our legitimate interest in enabling our shareholders and their proxies to use the **InvestorPortal**; the legal basis for this is Art. 6 (1) sentence 1 f) DSGVO. Insofar as we intend to use cookies during the provision of the **InvestorPortal**, which are not absolutely necessary for the provision of the **InvestorPortal**, this will only be done if you have consented to this; thus, in this case, we will inform you about the use of such cookies and the associated data processing beforehand and ask you for your consent; the legal basis for this data processing is then Section 25 (1) TTDSG in conjunction with your consent.

4) Other recipients of the personal data

Access to the Annual General Meeting and the **InvestorPortal** is granted only to FUCHS, to any service providers employed by FUCHS to implement the Annual General Meeting, and to shareholders, proxies, and journalists and guests that have been granted permission to participate by FUCHS.

At the Annual General Meeting, other shareholders and their proxies may inspect the data recorded about you in the list of attendees pursuant to Section 129 AktG.

For organizing and conducting the Annual General Meeting, we sometimes use external service providers in the EU (e.g. Annual General Meeting services, IT services, banks, notaries, attorneys) who, where necessary, are obliged under data processing agree-

ments to abide by data protection laws according to Art. 28 GDPR. FUCHS will only transmit the personal data to these service providers that is required in order to deliver the contracted service and will only process the data on our behalf and according to our instructions. In these cases, FUCHS remains responsible for protecting your personal data.

We may be obliged to transmit personal data to other recipients who process the personal data under their own responsibility (Art. 4 No. 7 GDPR), in particular to public authorities such as the competent supervisory authority.

If we forward personal data to providers outside the European Economic Area (EEA), this will require the third country to have a suitable level of data protection verified by the EU Commission or to provide other suitable data protection guarantees (e.g. binding internal corporate data protection guidelines or an agreement with the standard contractual clauses of the EU Commission).

We have no influence over the manner in which personal data that is disclosed at the Annual General Meeting in accordance with this privacy statement is processed by the journalists in attendance. We are not the controller in this regard as defined under the GDPR.

During the live transmission of the introductory remarks of the Chairman of the Annual General Meeting and the speech of the Chairman of the Executive Board on our website at www.fuchs.com/hauptversammlung in accordance with section III.5 of the invitation to the Annual General Meeting, the audience will not be in the picture. We ask all participants to remain quiet during this part of the Annual General Meeting. However, if contrary to this request you make audible comments containing personal data during this time, these may be audible in the broadcast to all persons following the broadcast without us having any influence on this.

5) Storage period

The storage period for the personal data processed in connection with the Annual General Meeting is usually up to three years. We anonymize or delete this personal data as long as it is no longer required for the above purposes. This does not apply if and when we are bound by legal proof and storage obligations (e.g. in the AktG, the German Commercial Code (HGB), or in the German Tax Code (Abgabenordnung)) to store the data for longer or if the data is pertinent to judicial or extra-judicial proceedings, such as in the case of actions for annulment and rescission; in these cases we will store the data for as long as the proof and storage obligations apply or until the legally effective or otherwise final conclusion of the relevant proceedings, including any enforcement proceedings.

6) Your rights according to the GDPR

You can contact our data protection officer or us directly with an informal message at any time and free of charge to exercise your rights according to the GDPR if the relevant conditions are met. According to this, you have the right:

- pursuant to Art. 15 GDPR, to request information about your personal data processed by us. In particular, you can request information about the processing purposes, the category of the personal data, the categories of recipients to whom your data was or will be disclosed, the planned storage period, the existence of a right of correction, deletion, restriction of processing or objection, the existence of a right to complain, the origin of your data if it was not collected by us, and about the existence of automated decision-making, including profiling and possibly meaningful information about the details thereof;

- pursuant to Art. 16 GDPR, to demand the correction of inaccurate or completion of your personal data stored with us;
- pursuant to Art. 17 GDPR, to demand the deletion of your personal data stored with us, provided that processing is not required in order to exercise the right to freedom of expression and information, to fulfill a legal obligation, for reasons of public interest, or to assert, exercise, or defend legal claims;
- pursuant to Art. 18 GDPR, to demand that the processing of your personal data be restricted, if you contest the accuracy of the data (the restriction then applies for the duration of the review), if processing takes place unlawfully and you refuse deletion, if we no longer require the personal data but you still need it to assert, exercise, or defend legal claims, or if you filed an objection to the processing pursuant to Art. 21 (1) GDPR (while the legitimacy of the objection is being reviewed);
- pursuant to Art. 20 GDPR, to be given your personal data that you provided to us, in a structured, standard and machine-readable format, or to demand that it be sent to another person responsible;
- pursuant to Art. 7 (3) GDPR, at any time to revoke the consent that you have given us; for this purpose, you can use the contact options mentioned above under Section 1 b) or - if you have given your consent via the InvestorPortal - also via this portal, if available. As a result, in future we will not be able to continue the data processing that relied on this consent and
- pursuant to Art. 77 GDPR, to complain to a supervisory authority. See No. 7 for further information on this.

7) Right of complaint

If you have any questions or complaints, you can contact our data protection officer (see No. 1 c)) or a data protection supervisory authority (Art. 77 GDPR).

The data protection supervisory authority responsible for FUCHS is:

State Commissioner for Data Protection and Freedom of Information Baden-Württemberg
 PO Box 10 29 32, 70025 Stuttgart
 Königstrasse 10a, 70173 Stuttgart
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