



**Siemens Energy AG**  
**Annual Shareholders' Meeting 2026**

**Information on data protection for shareholders of Siemens Energy AG and their proxy representatives as well as guests**

In this Privacy Policy, we inform you about the processing of your personal data by Siemens Energy AG in connection with the Annual Shareholders' Meeting 2026 and your rights under the GDPR.

For further information on how we process your personal data outside the context of the Shareholders' Meeting, please refer to our [Privacy Notice](#).

**Who is the controller for data processing?**

The controller responsible for processing your personal data within the meaning of the GDPR is Siemens Energy AG, Otto-Hahn-Ring 6, 81739 Munich, Germany.

ADEUS Aktienregister-Service-GmbH, Königinstraße 28, 80802 Munich, Germany, has been appointed as a service provider acting exclusively on instructions of Siemens Energy AG (data processor) to maintain the share register of Siemens Energy AG.

If you have any questions on data protection in the share register, please contact [hv-service.siemens-energy@adeus.de](mailto:hv-service.siemens-energy@adeus.de) or the shareholder hotline at +49 (0) 89/2070 - 84040.

**Categories of personal data processed**

We process the following categories of personal data of our shareholders and their proxies, if applicable:

- **Identification and contact details:** name, first name, date of birth, address, e-mail address, telephone number.
- **Shareholder and share-related data:** number of shares, type of shares, form of shareholding, register data of the shareholder (e.g. register sheet, register number), bank details of the custodian bank or the central securities depository, information on reported transactions involving shares.
- **Shareholders' Meeting-related data:** proxy authorizations, absentee votes/voting instructions, number of the admission ticket, statements, motions, election proposals, speech contributions and extracted questions and requests for information, objections.
- **Usage data relating to the Internet Service for the Shareholders' Meeting:** access data for the Internet Service (e.g. user ID, password). When you visit our Internet Service, we collect data regarding your access to the service. Certain data and device information are logged in the web server log files (e.g. requested or retrieved data including URL; date and time of access; message on successful access; type of web browser used; referrer URL, if transmitted by your browser; IP address; port used for access; actions performed within the Internet Service; individual access data and session ID; login and logout time stamps). Your browser automatically transmits this data when you visit our Internet Service. In addition, we use so-called web storage functions. As

part of the session storage technology, we collect information after your login, such as authentication tokens, session data, and your consent to our terms of use. We also use local storage functions to store the time stamp of your login.

When you attend the Shareholders' Meeting as a guest, we process your identification and contact details.

### **For what purposes and on what legal basis is your data processed?**

#### In connection with the Shareholders' Meeting

We process your personal data for the preparation, conduct and follow-up of the Shareholders' Meeting and to fulfil our statutory obligations towards you as a shareholder or proxy representative, in particular to:

- enable you to register for and participate in the Shareholders' Meeting (e.g. identity verification, verification of entitlement to exercise shareholders' rights, preparation and provision of the list of attendance for inspection, dispatch of voting cards),
- enable you to exercise your rights within or in connection with the Shareholders' Meeting (in particular granting, changing and revoking of proxy authorizations and instructions, exercising voting, motion, speech and information rights, submitting statements, as well as the right to object to resolutions of the Shareholders' Meeting, in the manner described in the invitation to the Shareholders' Meeting), and
- send the invitation documents to the Shareholders' Meeting via e-mail.

The legal basis for this is Article 6 (1) (c) GDPR in conjunction with Section 67e (1) of the German Stock Corporation Act (AktG), our statutory obligations under Sections 118 et seq. AktG, Section 67 (6) sentence 3 AktG, as well as Section 49 (3) sentence 1 no. 1 (d) of the German Securities Trading Act (WpHG).

In addition, we process your personal data in order to safeguard our legitimate interests in ensuring that the Shareholders' Meeting is conducted efficiently, securely, and in compliance with legal requirements. This includes, in particular:

- the control of access and issuance of admission cards for persons who are not shareholders but wish to attend as guests, to ensure secure conduct of the Shareholders' Meeting),
- electronic transcription of speeches at the Shareholders' Meeting to capture questions asked and prepare the answers (no automated decision-making takes place), and
- possible disclosure of data to our legal, tax or auditors to hold the Shareholders' Meeting in accordance with the applicable legal provisions and obtain external advice for this purpose.

The legal basis for such processing is Article 6 (1) (f) GDPR.

#### Use of the Internet Service and Cookie Functions

We process your personal data to provide and operate our Internet Service, and to automatically collect information (such as your device and user identification or operating system details) to ensure technical functionality and security. The legal basis for this is Article 6 (1) (f) GDPR (our legitimate interest in providing a functional and secure Internet Service).

For our Internet Service, we use technically necessary cookies, device information in web server log files, as well as web storage and local storage elements (collectively referred to as Cookie Functions). Cookies are small files that are placed by a website you visit on your desktop, laptop or mobile device. They allow us, for example, to recognize whether your device has already connected to our Internet Service before

or which language and other settings you prefer. Cookies may also contain personal data. Web storage functions also store small text files in the local storage of your browser on your device. Within the scope of session storage technology, we enable your recognition as a user during an active session (for example, when switching pages or reloading). The local storage function is used for security purposes (for example, automatic logout) to store the login timestamp. These data are automatically deleted when you close your browser.

You can configure your browser to notify you about the use of Cookie Functions, to allow them only in individual cases, or to generally block or delete them. Please note that some functions of our Internet Service may no longer be fully available or may only be available to a limited extent if these technologies are disabled.

The Cookie Functions used by us serve exclusively to provide the Internet Service, to register and identify shareholders and their proxies, to detect misuse, to correct malfunctions and to ensure the smooth technical operation of the Shareholders' Meeting.

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The legal basis for the use of Cookie Functions, the access to the data stored therein and the related processing of personal data is Section 25 (2) No. 2 of the German Telecommunications-Digital Services Data Protection Act (TDDDG), as this is required to provide the Internet Service you have requested. Further processing of personal data collected via Cookie Functions is necessary for the purpose of safeguarding our legitimate interest in enabling shareholders and their proxies to use our Internet Service. The legal basis for this processing is Article 6 (1) (f) GDPR. Where we intend to use Cookie Functions that are not strictly necessary for the operation of the Internet Service, such as functional or performance cookies, we will do so only if you have given your consent.

#### Share Register and Communication with Shareholders

We process your personal data to maintain the share register and register shareholders, as well as to communicate with you as a shareholder and clarify any ambiguities in the register. The legal basis for this is Art. 6 (1) (c) GDPR in conjunction with Section 67 AktG and Section 67e (1) AktG and other stock corporation, capital market and supervisory law requirements that oblige us to fulfil these duties.

#### Additional Processing

We also process your personal data to comply with other legal obligations, such as regulatory requirements and record-keeping obligations under stock corporation, commercial and tax law, including compliance with securities legislation in other EU member states. The legal basis for these processing activities is the respective statutory provision in conjunction with Article 6 (1) (c) GDPR.

For statistical analyses, we process personal data based on our legitimate interest in analysing the company's capital structure as a basis for corporate decision-making (Article 6 (1) (f) GDPR).

#### **From whom do we obtain your data?**

We – or the service providers engaged by us – receive the personal data of shareholders from the shareholders themselves, from publicly accessible sources, or via our registration office from the credit institutions of the shareholders that have been entrusted with the custody of our shares (so-called custodian banks), as well as from meeting minutes and related documentation, and from the central securities depository Clearstream Europe AG, Eschborn, Germany.

If you act as a proxy representative of a shareholder, we obtain your personal data from the shareholder who has granted you the proxy authorization and directly from you, insofar as your conduct at the Shareholders' Meeting or your use of the Internet Service is concerned.

For guests attending the Shareholders' Meeting, we receive the data directly from the guests themselves for purposes of access control.

### **To which categories of recipients do we pass on your data?**

We use external service providers and their subcontractors, e.g. share register service, Shareholders' Meeting service provider, for administration and technical maintenance of the share register, for the organization of the Shareholders' Meeting, and for the electronic transcription of speeches at the Shareholders' Meeting. These service providers receive only such personal data as are necessary for the performance of their respective tasks and process such data exclusively on our behalf and in accordance with our instructions.

All our employees and all employees of these external service providers who have access to or process personal data are obligated to maintain strict confidentiality. In connection with the preparation, conduct and follow-up of the Shareholders' Meeting, we may also transmit your personal data to our legal advisers, tax advisers or auditors.

When publishing requests for additions to the agenda, counterproposals, election nominations, and statements we disclose the name and address of the respective shareholder or proxy representative as provided for in the AktG and make it publicly accessible as provided for in the German Stock Corporation Act (AktG). If the proxy representatives appointed by the company are authorized, they will receive the personal data of the principal necessary for exercising voting rights in accordance with instructions. If you exercise your right to object to resolutions of the Shareholders' Meeting, the notary will receive your personal data.

Please note that the entire Shareholders' Meeting will be broadcast on the internet via a livestream, so that, in addition to all participants in the Shareholders' Meeting, all viewers of the livestream can also take note of the name and place of residence and, if applicable, other personal data of shareholders or proxy representatives who exercise a right to speak, submit motions or exercise their right to obtain information at the Shareholders' Meeting. During the Shareholders' Meeting, shareholders and their proxy representatives may view the list of attendance.

Finally, we may be legally required to transmit your personal data to additional recipients, for example in connection with the publication of notifications of voting rights pursuant to the German Securities Trading Act (WpHG) or to public authorities to fulfil statutory reporting obligations.

Your personal data is generally processed in countries that are part of the European Union (EU) and the European Economic Area (EEA). To the extent that we send information, such as invitations to Shareholders' Meetings, to shareholders located in third countries (i.e. countries outside the EU/EEA), such information may include personal data (e.g. names of applicants). As the provisions of the GDPR do not directly apply in such third countries and, in the absence of an adequacy decision by the European Commission, a lower level of data protection may exist, this transfer is nevertheless necessary to ensure that all shareholders are informed equally and to fulfil our contractual obligations. The legal basis for such transfers is Article 49 (1) (b) GDPR.

### **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 and provided that statutory documentation and storage obligations (e.g. under the AktG, German Commercial Code (HGB), German Fiscal Code (AO) or other legal provisions) do not require otherwise.

Where legally required or where we have a legitimate interest in retaining personal data – for example in the event of judicial or extrajudicial disputes arising in connection with the Shareholders' Meeting – the data may be stored for a longer period. After that, the personal data will be deleted.

### **What are your rights as a data subject?**

If the statutory requirements are met, you have the right to obtain information on the personal data concerning you that we have stored (Article 15 GDPR). In addition, within the limits prescribed by law, you may request rectification (Article 16 GDPR), erasure (Article 17 GDPR) or restriction of processing (Article 18 GDPR) of your personal data. You also have the right to data portability (Article 20 GDPR).

Furthermore, you have the right to withdraw your consent to the processing of your personal data at any time (Article 7 GDPR).

**Where we process your personal data on the basis of the legitimate interests of Siemens Energy AG or those of a third party, you have the right, on grounds relating to your particular situation, to object at any time to the processing of your personal data (Article 21 GDPR). In such a case, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or unless the processing serves to establish, exercise or defend legal claims.**

### **Who can you contact if you have questions, comments or complaints about data protection?**

If you have any questions about data protection or wish to exercise your rights as a data subject, you may contact the data protection officer of Siemens Energy AG at [dataprotection@siemens-energy.com](mailto:dataprotection@siemens-energy.com).

If you believe that the processing of your personal data violates the GDPR, you have the right to lodge a complaint with the supervisory authority referred to in Article 77 GDPR, in particular with the supervisory authority of the place of the alleged infringement:

Bayerisches Landesamt für Datenschutzaufsicht  
(Bavarian State Office for Data Protection Supervision)  
Promenade 18  
91522 Ansbach

<https://www.lda.bayern.de/de/kontakt.html>.

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