

Information on data protection for shareholders and shareholders' representatives of Hamburger Hafen und Logistik AG

With the following notice, HHLA informs about the processing of personal data of shareholders, shareholders' representatives and persons attending the Annual General Meeting of Hamburger Hafen und Logistik Aktiengesellschaft (HHLA) as well as the rights these persons are entitled to under applicable data protection law.

Responsible for data processing

Hamburger Hafen und Logistik AG

Bei St. Annen 1, 20457 Hamburg, Germany

Phone: +49 40 3088-0, Fax: +49 40 3088-3355, ► info@hhl.de

Please contact our data protection officer if you have any questions regarding this information. Our data protection officer can be contacted by post at the above address or by email at ► datenschutz@hhl.de.

Legal basis for data processing

We process your personal data while complying with the EU General Data Protection Regulation (GDPR) as well as with the German Federal Data Protection Act (BDSG), the German Stock Corporation Act (AktG) and any other relevant legal provisions.

Type of data and purpose of data processing

Personal data of shareholders and, if applicable, authorized representatives or attendees of the annual general meeting are mainly processed in connection with the administration of the share register and the holding of annual general meetings. In the share register, each shareholder has to be registered with his/her name, birth date and address as well as the number of shares or the share certificate number(s) of the respective shares (cf. Section 67 AktG). In connection with the annual general meeting, additional personal data may be processed (such as Email-address, admission ticket number, granting of any proxies). In case shareholders register for the submission of the documents to the annual general meeting via E-Mail, the respective E-Mail-address of the shareholder will be processed. If shareholders are being represented by an authorized representative at the annual general meeting, corresponding personal data of the authorized representative will be processed. If a guest card is ordered, the name of the respective guest will be processed. The purpose of the data processing in each case is to comply with statutory law and enabling the attendance and exercise of shareholders' rights prior to and at the annual general meeting. The data collected may also be used for purposes consistent with those outlined above (in particular, for the creation of statistics, e.g. for the presentation of shareholder developments, the number of transactions or for overviews of the company's key shareholders). The legal basis for the processing of your personal data in these respects is the Stock Corporation Act in conjunction with Art. 6 (1) (c) and (4) GDPR.

Personal data may also be processed for the fulfilment of further statutory obligations, such as regulatory requirements or retention obligations under company, commercial or tax law. For example, in case shareholders authorize the proxy designated by the company to exercise voting rights at the annual general meeting, we must record the data serving to evidence the authorisation of the company proxies in order to comply with provisions of company law. In this case, the relevant statutory provisions and Art. 6 (1) (c) GDPR are the legal basis for the processing of the data.

In individual cases, we will also process your data in order to safeguard our legitimate interests under Art. 6 (1) (f) GDPR. For example, this may be necessary if, in the event of capital increases, we are required to exclude certain shareholders due to their nationality or place of residence from notifications regarding offers for subscription, in order to comply with the securities legislation of such non-European countries.

Should we intend to use your personal data for a purpose not indicated above, we will notify you of this in advance in accordance with applicable statutory provisions.

Transmitter of data

Each shareholder is generally obliged to furnish the company with the data required for the maintenance of the share register (name, birth date and address as well as the number of shares or the share certificate number(s) of the respective shares). The banks involved in the purchase or custody of your HHLA registered shares will usually forward to us on your behalf the details that are relevant to the maintenance of the register (for example, in addition to the aforementioned data, your nationality, your gender and the remitting bank). This is implemented through Clearstream Banking Frankfurt, which, as a central securities depository, is responsible for the technical processing of securities transactions and for the custody of shares on behalf of banks. Should you sell your shares, we will likewise be notified of this through Clearstream Banking Frankfurt.

Forwarding of data to third parties

External service providers: External service providers are involved in the administration and technical maintenance of the share register (share register service company, IT service provider) and the holding of Annual General Meetings (AGM service providers, service providers handling the printing and dispatch of shareholder notifications).

Further recipients: If you attend the Annual General Meeting, other HHLA shareholders may be able to view any personal data of you that are contained in the list of participants pursuant to Section 129 AktG. In addition, counterproposals, election proposals as well as motions to supplement the agenda are generally to be published together with the name of the applicant. We may also be obliged to forward your personal data to further recipients, e.g. to authorities in fulfilment of statutory notification obligations (e.g. if the voting rights thresholds prescribed by law are exceeded).

Data storage period

We will anonymise or delete your personal data as soon as they are no longer required for the above-mentioned purposes and provided that we are not obliged to maintain them under statutory documentation and retention obligations (e.g. under the Stock Corporation Act, the German Commercial Code or the German Fiscal Code). The retention period for data collected in connection with Annual General Meetings is usually up to three years. Following the sale of shares, we are normally obliged to retain the data stored in the share register for a further period of ten years. In addition, in exceptional cases we will retain personal data where this is necessary in connection with claims asserted against our company (with a statutory limitation period of up to thirty years).

Forwarding of data to non-European countries

Any forwarding of personal data to service providers outside of the European Economic Area (EEA) will only occur if and to the extent that the European Commission has confirmed an appropriate level of data protection for the third country in question or where other appropriate data protection guarantees (e.g. the service provider in question has binding internal data protection rules or the European Commission's standard contract clauses) have been stipulated. More detailed information on this and on the level of data protection for our service providers in third countries can be requested via our data protection officer.

Your data protection rights

Right to information: You may request information on your stored personal data from our address provided above. Subject to certain conditions, you may also request your personal data to be deleted or their processing to be limited (e.g. in the event of unlawful processing of your data). Where possible, please notify us via your custodian bank of any corrections to your personal data.

Right of objection: To the extent we process your data to safeguard legitimate interests, you may submit an objection to this processing to our address provided above, where the specific situation in question justifies refraining from processing data. In case of such objection, we will no longer process your data unless the processing serves to fulfil superior mandatory legitimate interests on our side.

Right of complaint: If you wish to submit a complaint regarding the handling of your data, you may contact our data protection officer at the above address or the relevant data protection supervisory authority. The data protection supervisory authority responsible for HHLA is:

The Hamburg Commissioner for Data Protection and Freedom of Information
Klosterwall 6 (Block C), 20095 Hamburg, Germany

► mailbox@datenschutz.hamburg.de