

## Data Protection Information for Shareholders and their Representatives

The protection of personal data is of high importance to Siltronic AG. This document contains information on how your personal data is processed by Siltronic AG if you are a

- Siltronic AG Shareholder, or
- nominated to represent a Siltronic AG Shareholder at the (virtual) annual general meeting.

You will also find information about your rights with regard to the processing of your data.

Siltronic AG processes your data in accordance with the data protection regulations contained in the German Federal Data Protection Act (*Bundesdatenschutzgesetz* or *BDSG*) and Regulation (EU) 2016/679 (General Data Protection Regulation - GDPR) as well as the German Stock Corporation Act (*Aktiengesetz* or *AktG*) and the further applicable regulations relating to the protection of personal data and data security.

Should you have any questions or concerns after reading this data protection information, you are welcome to contact our Data Protection Officer:

Siltronic AG, Data Protection Officer Tina Klimaschewski

E-mail address: [datenschutz@siltronic.com](mailto:datenschutz@siltronic.com)

Phone: +49 8677 906 87560

### I. Who is responsible for processing my personal data?

Siltronic AG, Einsteinstraße 172, 81677 Munich ("Siltronic AG") is responsible for the processing of your personal data within the meaning of Article 4 no. 7 of the GDPR lies with.

## **II. What data is processed?**

Siltronic AG processes the following categories of personal data:

1. Name, date of birth and address (including an electronic mail address) of the Shareholder
2. Number of shares held by the Shareholder
3. Shareholder number and date of acquisition of shares including a history of the holding
4. Where appropriate, past addresses and occupation of Shareholder
5. Nationality of the Shareholder
6. Shareholding divided into shares held in their own name and on behalf of third parties, proportion of Company's nominal capital; where appropriate title, electronic mail address and telephone and fax number of Shareholder
7. Name and place of residence of Shareholder's representative (where appropriate, including title, electronic mail address and telephone and fax numbers)
8. Entry ticket and voting slip numbers, number of shares concerned and details of type of ownership
9. Information concerning powers of attorney granted and instructions given
10. Details of voting rights notices
11. Access data for the Siltronic AG shareholder portal (InvestorPortal)

When you visit the Siltronic AG shareholder portal (InvestorPortal) on the internet, the following data and device information is also automatically transmitted to us by your browser and logged in the web server log files:

12. Data accessed or requested as well as date and time of access and notification whether the access was successful
13. Type of web browser used and referrer URL (the previously visited page)
14. IP address
15. Session ID and login

Siltronic AG also uses so-called web storage functions. For this purpose, small text files are stored in the local memory of your browser on your device and saved there. As part of the session storage technology, we collect information about the respective authentication token (i.e. your “virtual” admission ticket) and your session data (so-called session data) after your login, including the granting of consent to the terms of use. You will thus be recognized as a user if, during an active session, you need to switch to another page of the portal, return to our website or reload the page. In addition, we use the so-called local storage function to save the time stamp of your login, which for security reasons enables an automatic logout after 30 minutes of inactivity. This data is automatically deleted when you close your browser. In your browser menu, you can set the settings so that the admission of web storage objects is prevented by technical means and you are informed by your browser about the placement of a new web storage object. Please note that the functionality of our website may only be available to a limited extent if web storage objects are deactivated.

### **III. For what purposes and on what legal basis is personal data processed?**

1. Siltronic AG processes Shareholder data as specified under Section II. 1. through 3. for the purpose of maintaining the share register required by law. The legal basis for the processing of data is provided by Section 67 AktG. Section 67 AktG requires every shareholder to furnish the company with data pursuant to Section II. 1. and 2. However, the information required under Section 67 para. 4 AktG is regularly provided by financial institutions involved in the acquisition or storage of shares. This takes place via Clearstream Banking Frankfurt which handles the technical processing of securities transactions as central custodian and stores the shares for the financial institutions. If you sell your shares, this too will be reported to Siltronic AG via Clearstream Banking Frankfurt. The information pursuant to Section II. 3. is ascertained and assigned by the Company itself or by its service providers.
2. Siltronic AG processes data as per Section II. 1. through 3. and 6. through 10 as well as the access data as per Section II. 11. through 15 pertaining to Shareholders and their authorized representatives in order to prepare for, carry out and document (virtual) annual general meetings. This also includes the verification of entitlement to attend a virtual general meeting as a Shareholder or shareholder representative, the preparation of an attendee list pursuant to Section 129 AktG, to document your votes or the storage of data about the powers granted to proxy holders of the Company in order to comply with the documentation obligation under Section 134 para. 3 sentence 5 AktG.

The relevant legal basis is provided by Art. 6 para. 1 sentence 1 letter c) of the GDPR in conjunction with the respective provisions of the AktG in order to safeguard justified interests of Siltronic AG in the effective and lawful preparation and conduct of the (virtual) annual general meeting and to offer a means to demonstrate that resolutions adopted by the general meeting were duly and properly passed.

Data, insofar as not already notified by Clearstream Banking Frankfurt, are provided to the Company by the parties involved (Shareholders or their representatives) themselves or by their depositary banks; the link to entry ticket and voting slip numbers is provided by the Company itself or by service providers appointed by it.

3. Insofar as may be required to comply with other obligations imposed by law or by the supervisory authorities, the data specified in Section II. pertaining to Shareholders and their representatives are processed by Siltronic AG for these purposes also. This may for example include publication of voting rights notices pursuant to Section 40 para. 1 of the German Securities Trading Act (WpHG) and the inclusion of this data in the annual financial statements pursuant to Section 160 para. 1 no. 8 AktG and compliance with other transparency, reporting, publication and archiving obligations imposed by corporate, commercial and tax law or which are otherwise applicable. The legal basis is provided by Art. 6 para. 1 sentence 1 letter c) of the GDPR in conjunction with the respective provisions of the law.
4. In addition, Siltronic AG also processes the data pursuant to Section II. 1. through 4. and 6. in order to safeguard its own justified interests in communicating with you as a Shareholder, as well as for certain analyses and statistical evaluations (e.g. to develop the Shareholder base). The legal basis is Art. 6 para. 1 sentence 1 letter f) of the GDPR.
5. Siltronic AG processes the access data and device information pursuant to Section II. 11. through 15. in web server log files and web storage elements in order to make the shareholder portal (Investor Portal) technically available, to detect misuse, to eliminate faults and to ensure the smooth running of the virtual annual general meeting. The legal basis is therefore Art. 6 (1) sentence 1 lit. f) GDPR.
6. In individual cases, Siltronic AG may process your personal data including data pursuant to Section II. 5. in order to facilitate compliance with the securities regulations of certain non-European states which necessitate the exclusion of citizens of these states or persons with a permanent place of residence in such states from participating in information on rights offerings. The legal basis for data processing of this kind is provided by Art. 6 para. 1 sentence 1 letter f) of the GDPR.

## **Right of objection**

Persons concerned may object to the processing of their data as explained in Section III. 2., 4. and 5. for the purpose of safeguarding justified interests of Siltronic AG if their particular situation gives cause to oppose this processing. Siltronic AG will cease such processing, provided that Siltronic AG has no interests in such processing which require such data to be processed. An objection may be made to the postal address or e-mail address given above.

### **IV. For how long will my personal data be stored?**

Personal data pertaining to Shareholders and their authorized representatives will be deleted or anonymized when no longer required for the purposes described herein. It may arise that personal data will be stored for the period of time for which these are required in order to defend claims made against our Company or alternatively to assert legal claims by Siltronic AG; the statutory limitation periods of up to 30 years apply. In addition, we will also keep your personal data insofar as we are legally obliged to do so. Such obligations to record or store data may in particular arise from the provisions of corporate, commercial or tax law or other applicable regulations. The storage periods amount to up to 10 years. The standard storage period for data stored in the share register is 10 years from the date of sale of the shares, whereas the documentation period for personal data processed in connection with the (virtual) annual general meeting pursuant to Section 134 para. 3 sentence 5 is 3 years.

### **V. Will my personal data be transferred to third parties?**

1. For certain (technical) processes (e.g. maintaining the register of shares, preparing for and carrying out (virtual) annual general meetings) Siltronic AG engages external service providers (e.g. IT service providers, AGM service providers) who are given access to personal data for the purpose of performing these services.

These service providers are carefully selected and meet high data protection and data security standards. They are committed to strict confidentiality and to process data solely on behalf of and on the instructions of Siltronic AG.

2. Insofar as Siltronic AG may obtain legal advice on certain matters (e.g. with regard to the preparation, conduct and documentation of the (virtual) annual general meeting, or where appropriate with regard to maintaining the register of shares), parties advising the Company may also gain access to personal data in connection with specific issues. The attorneys advising Siltronic AG are already by virtue of their profession subject to strict confidentiality.

3. The data listed in the attendees list pursuant to Section 129 AktG are also available for inspection by other Siltronic AG Shareholders and other participants in the general meeting.
4. Voting rights notices (e.g. pursuant to Section 33 para. 1 sentence 1 WpHG), demands (e.g. pursuant to Section 122 paras. 1, 2 AktG), applications (e.g. pursuant to Sections 126, 127 AktG) or similar items that the Company is required to publish are publicly available along with the data that must be included.
5. Other than in the cases explained in this privacy policy, Siltronic AG will transfer your data to third parties without your express consent if it is obliged to do so by law or by an official or court order (e.g. to the appropriate authorities if statutory reporting deadlines are exceeded).

## **VI. What rights do I have in respect of my personal data?**

1. You are entitled to be informed of the personal data kept by Siltronic AG. Provided that the respective legal conditions are met, you are also entitled to have your data corrected or deleted and to have the processing thereof restricted. In addition, you also have the right to receive the personal data provided by you in a structured, commonly used and machine-readable format. This includes the right to communicate this data to another responsible party. Insofar as it is technically possible, you may also request that Siltronic AG communicate personal data directly to another responsible party.
2. You may also refer any complaints to the competent supervisory authority, the Bayerisches Landesamt für Datenschutzaufsicht (BayLDA), Promenade 27, 91522 Ansbach, Germany.