

# Data protection notice

## 1. General information

### a) Introduction

Rheinmetall AG attaches great importance to the protection of your personal data. This will be achieved by using, inter alia, secure, state-of-the-art methods of data communication.

The aim of the following data protection information is to brief our shareholders on the processing of their personal data and their rights in this regard in accordance with the applicable data protection laws, especially the Regulation (EU) 2016/679 (General Data Protection Regulation – GDPR), in connection with the preparation, execution and follow-up of the Annual General Meeting.

### b) Controller as referred to in Article 4(7) GDPR

Rheinmetall AG  
Rheinmetall Platz 1  
40476 Düsseldorf

### c) Contact information for the Data Protection Officer

Rheinmetall AG  
Data Protection Officer  
Rheinmetall Platz 1  
40476 Düsseldorf  
E-mail: dsb-rhag@rheinmetall.com

## 2. Information regarding processing

### a) Categories of data and groups of data subjects

We process the following categories of personal data in particular:

- First and last name,
- Address,
- Number of shares,
- Class of shares,
- Type of ownership of the shares and
- Number on the ticket.

We may also process the personal data of any proxy nominated by a shareholder (in particular, his/her name and his/her address). If shareholders or their proxies contact us, we also process those personal data that are needed to respond to any concerns (such as the contact data provided by the shareholder or proxy, their e-mail address or telephone number for example). If applicable, we also process information on shareholders' motions, questions, election proposals and requests in the Annual General Meeting. Guests invited to the event are also affected by data processing within the framework of the Annual General Meeting.

### b) Purposes and legal basis of the processing

We use personal data to allow shareholders to participate and exercise their rights within the framework of the Annual General Meeting. The processing of personal data is required for the proper preparation, execution and follow-up of the Annual General Meeting and to allow the shareholders' participation in the Annual General Meeting in accordance with Sections 118 et seqq. of the German Stock Corporation Act (AktG). The legal basis for the processing of personal data is the German Stock Corporation Act (AktG) in conjunction with Article 6 (1) sentence 1 letter c GDPR.

If applicable, we also process personal data to comply with additional legal obligations, such as supervisory requirements and the retention obligations imposed by stock corporation, securities, commercial, and fiscal legislation. The legal basis for the processing is the respective statutory regulations in conjunction with Article 6 (1) sentence 1 letter c GDPR.

We also process personal data to ensure the safety of the event and, in the event of disruption to the proceedings of the Annual General Meeting, to ensure the prosecution and punishment of criminal acts and the enforcement of claims under civil law. The legal basis for the processing of personal data is our legitimate interest and the interest of the shareholders in accordance with Art. 6 (1) sentence 1 letter f GDPR.

All Rheinmetall AG shares are bearer shares. Unlike registered shares, Rheinmetall AG does not maintain a stock register within the meaning of Section 67 AktG, in which the name, date of birth and address of the shareholder as well as the number of shares must be recorded.

#### c) Categories of recipients of personal data

We make use of external service providers in part for the preparation, execution and follow-up of the Annual General Meeting (especially for printing and dispatching the invitation to the Annual General Meeting and for registering for the Annual General Meeting and its execution). Service providers who are commissioned for the preparation, handling, and follow-up of the Annual General Meeting only receive from us such personal data as are needed to carry out the commissioned service and process these data solely in accordance with the instructions of Rheinmetall AG. Each of our employees and all employees of external service providers that have access to personal data and/or process them are obliged to handle such data in confidence. The service providers are all based in the EU/EEA. No transmission to third countries takes place in this respect.

Participants in the Annual General Meeting may also consult the data recorded in the list of participants to be made accessible to all participants in the Annual General Meeting in accordance with Section 129 (1) sentence 2 AktG in the Annual General Meeting.

We may also, where legally permissible, transmit your personal data to authorities (e.g. prosecutorial authorities) and courts in Germany and abroad to comply with statutory obligations.

#### d) Data sources

We or our commissioned service providers usually receive shareholders' personal data from shareholders' intermediaries, which have been commissioned to store the shares (generally custodian banks or intermediaries), via our registration office.

#### e) Retention period

Generally, the retention period for data recorded in connection with the Annual General Meeting amounts to up to three years. In principle, we render personal data anonymous or delete them unless statutory obligations to furnish evidence or store such data require us to store them longer or longer storage is required as part of court proceedings.

Information on shareholders' questions and speeches in the upcoming Annual General Meeting will, in principle, be rendered anonymous after six weeks unless longer storage is required for the reasons mentioned above.

#### f) Processing in connection with the SARS-CoV-2 coronavirus

The legal basis for the processing of personal data – including the potential registration of all participants in the Annual General Meeting by means of forms in order to be able to track infection chains, the potential transmission of the participant list and forms to the health authorities and other authorities, and the fulfillment of any other official requirements – is our legitimate interests as well as those of the shareholders and other persons present in accordance with Art. 6 (1) sentence 1 letter f GDPR, as well as the vital interests of the aforementioned persons in accordance with Art. 6 (1) sentence 1 letter d GDPR in order to counteract health risks and dangers in connection with the Sars-CoV-2 coronavirus.

#### g) Video and audio broadcast of the Annual General Meeting in additional rooms throughout the meeting venue

Our legitimate interest for such a broadcast ordered by the chairperson arises from Section 118 (4) AktG. The legal basis for processing is Art. 6 (1) sentence 1 letter f GDPR, Section 118 (4) AktG in conjunction with our Company's Articles of Association.

#### h) Video recordings in connection with disruption to the proceedings of the Annual General Meeting

In connection with disruption to the proceedings of the Annual General Meeting, video recordings can be made to safeguard legitimate interests - protection of shareholders and other persons present, prevention and punishment of criminal acts, enforcement and defense of claims under civil law, preservation of evidence, exercise of the right to order disruptive persons to leave, protection of equipment and property of Rheinmetall AG (for the purpose of video recordings). If criminal acts or risks to public safety are suspected, video recordings can be transmitted to the authorities. In addition, video recordings can be processed in order to implement and defend claims and to enforce the right to order disruptive persons to leave, particularly by transmitting such recordings to lawyers and other advisors, security and other service providers, experts, insurance companies and courts. The legal basis for such processing of personal data is Article 6 (1) sentence 1 letter f GDPR.

Video recordings requested by courts or authorities will be made available to them. The legal basis for such processing of personal data is Article 6 (1) sentence 1 letter c GDPR.

Any video recordings produced are generally deleted no later than 48 hours after the conclusion of the Annual General Meeting. Recordings are stored for a longer period if this is necessary to achieve the purpose of the video recordings and longer-term storage does not conflict with data subjects' interests that are worthy of protection.

### 3. Rights of the data subjects

As data subjects, shareholders may approach our Data Protection Officer informally at any time via the contact data specified under 1.c) to assert their rights to check their conditions on a case-by-case basis in accordance with the GDPR. These include in particular:

- The right to obtain information about the data processing and a copy of the processed data (right of access, Article 15 of the GDPR),
- The right to demand rectification of inaccurate data or completion of incomplete data (right to rectification, Article 16 of the GDPR),
- The right to demand erasure of personal data (right to erasure, Article 17 of the GDPR),
- The right to restrict data processing (right to restriction of processing, Article 18 of the GDPR).

Data subjects also have the right to lodge a complaint with a supervisory authority. The data protection supervisory authority responsible for Rheinmetall AG is the State Officer for Data Protection and Freedom of Information North Rhine-Westphalia, Kavalleriestr. 2-4, 40213 Düsseldorf.

Düsseldorf, March 2020

Rheinmetall AG