



Data protection information for shareholders and their proxies

The protection of personal data is of great importance to NORMA Group SE. This is to inform you about the processing of your personal data by NORMA Group SE if you

- are a shareholder of NORMA Group SE or
- have been authorised by a shareholder of NORMA Group SE to represent it as proxy at the general meeting.

Additionally, you will receive information about your rights with regard to the processing of your data.

NORMA Group SE processes your data in accordance with the data protection provisions of the Federal Data Protection Act (*Bundesdatenschutzgesetz* – “BDSG”), the German Stock Corporation Act and the Regulation (EU) 2016/679 (General Data Protection Regulation – “GDPR”).

If, after reading this data protection information sheet, you should have any questions or concerns, please feel free to contact our data protection officer, whom you can reach as follows:

- at the following address:

NORMA Group SE
Data Protection Office
Edisonstr. 4
63477 Maintal
Germany,

- at the e-mail address:

dataprotection@normagroup.com, or

- at the telephone number:

+49 (0) 6181 61027611.

I. Who is controller for the processing of my personal data?

Controller for the processing of your personal data within the meaning of Article 4 no. 7 GDPR is NORMA Group SE, Edisonstr. 4, 63477 Maintal.

II. What data are processed?

NORMA Group SE processes in particular the following personal data:

1. Shareholder's name, date of birth, postal address and electronic address,
2. Number of shares held by the shareholder,
3. Shareholder number and date of purchase of the shares,
4. Nationality of the shareholder,
5. Type of custody of the shares and custodian bank,
6. Name and residence of the shareholder proxy (including, if applicable, address, e-mail address and telephone and/or fax number),
7. Information on powers of attorney and instructions to company proxies,
8. Information contained in voting rights notifications.

III. For what purposes and on what legal basis are the personal data processed?

1. NORMA Group SE processes the shareholders' data listed under II.1 to II.5 for the maintenance of the share register as mandated by law. The legal basis for the data processing in this respect are sections 67, 67e(1) German Stock Corporation Act (AktG). Section 67 German Stock Corporation Act generally requires every shareholder to provide the Company with the data set out in II.1 and II.2. However, the intermediaries (e.g. credit institutions) involved in the acquisition or safekeeping of the shares normally convey the information which is necessary pursuant to section 67(4) German Stock Corporation Act. This is carried out via Clearstream Banking Aktiengesellschaft, Frankfurt am Main, which, as the central securities depository, performs the technical execution of securities transactions and the custody of shares for the intermediaries. If you sell your shares, this will likewise be notified to NORMA Group SE via Clearstream Banking Aktiengesellschaft.
2. NORMA Group SE additionally processes the data of shareholders and their proxies which is listed in II.1 to II.3, as well as II.5 to II.8 for the organisation of general meetings. The legal basis for this is section 67e(1) German Stock Corporation Act, Article 6(1) sentence 1(c) GDPR in conjunction with the relevant provisions of the Stock Corporation Act and Article 9(1)(c) of Regulation (EC) no. 2157/2001 on the Statute for a European Company (SE) (the "SE Regulation"), as well as Article 6(1) sentence 1(f) GDPR on the purposes of the legitimate interests pursued by NORMA Group SE in the preparation and conduct of the general meeting in an effective and legally compliant manner. The data

that are not conveyed by Clearstream Banking Aktiengesellschaft will be provided to the Company by the data subjects themselves or their custodian banks.

3. Insofar as this is necessary in order to fulfil other statutory or regulatory duties, NORMA Group SE will process the data set out in II. for these purposes as well. These include, for example, the publication of voting rights notifications pursuant to section 40(1) of the German Securities Trading Act, as well as the implementation of other transparency, notification, publication and safeguarding obligations under the laws governing stocks, trade, and tax, or any other applicable provisions. The legal basis for this is Article 6(1) sentence 1(c) GDPR in conjunction with the relevant statutory provisions.
4. Beyond that, NORMA Group SE processes the data set out under II.1 to II.3 and II.5 for the purposes of its legitimate interest in communication with you as a shareholder, as well as for analyses and statistical evaluations to ascertain the shareholder structure of NORMA Group SE. The legal basis in this regard is section 67e(1) German Stock Corporation Act and Article 6(1) sentence 1(f) GDPR.

Right to object

Data subjects may object to the processing of their data as described in III.2 und III.4 for the purposes of NORMA Group SE's legitimate interests if grounds exist relating to their particular situation which stand in opposition to this data processing. NORMA Group SE will no longer process the personal data unless it has a compelling and legitimate interest in this processing. An objection can be asserted using the aforementioned contact details.

IV. How long will my personal data be stored?

Personal data of shareholders and their proxies will be erased or anonymised once they are no longer necessary for the described purposes and no statutory obligations to retain records remain. The standard retention period for data stored in the share register is ten years after the sale of the shares. The storage period for personal data that are processed in connection with the general meeting is normally three years. In individual cases, data can also be retained for a longer period (up to the expiry of the statutory limitation periods) if they are necessary for the enforcement of legal claims of NORMA Group SE or defence against claims directed against the Company. Should the Company become aware that a shareholder is no longer a shareholder of the Company, his personal data will, according to section 67e(2) German Stock Corporation Act and subject other statutory provisions, be retained for no more than twelve months provided that the data are no longer needed for possible legal disputes.

V. Will my personal data be passed on to third parties?

1. NORMA Group SE avails itself of external service providers (e.g. IT service providers, general meeting service providers, legal advisors) for certain processes (e.g. maintenance of the share register, organisation of the general meeting), who receive access to personal data for the rendering of these services. These service providers are carefully selected and meet high data protection and data security standards. They are obliged to maintain strict confidentiality and process your personal data only when commissioned to do so by NORMA Group SE and according to its instructions.
2. The Shareholder Portal of the Company on the internet at <https://www.norma-group.com/corp/en/investors/agm/shareholder-service/> is made available and operated on behalf of NORMA Group SE by Computershare Deutschland GmbH & Co. KG, Elsenheimerstr. 61, 80687 München, Germany (“Computershare”). On this portal, personal data of shareholders’ will be collected, processed, and used only within the scope of a commissioned data processing agreement concluded between NORMA Group SE and Computershare. Computershare is not permitted to use your personal data for its own purposes.
3. The data listed in the attendance list pursuant to section 129 German Stock Corporation Act can be viewed by other shareholders of NORMA Group SE.
4. Voting rights notifications (e.g. pursuant to section 40(1) German Securities Trading Act, demands (e.g. pursuant to section 122(1) and (2) German Stock Corporation Act), applications (e.g. pursuant to sections 126 and 127 German Stock Corporation Act) or the like which need to be published by the Company will, depending on the medium selected by the Company, be accessible, with the data to be provided in them, either to the public or at least to the other shareholders and the shareholder proxies.
5. With the exception of the cases outlined in this data protection statement, NORMA Group SE will only pass on your data to third parties without your explicit consent if it is required to do so by law or by administrative or judicial directive (e.g. to public authorities where statutory notification thresholds are exceeded).

VI. What rights do I have with regard to my personal data?

1. You have the right to access the personal data stored by NORMA Group SE and, provided that the relevant statutory requirements are met, may also request rectification, erasure and restriction of the processing. You also have the right to receive the personal data you have provided in structured, commonly used and machine-readable formate. This includes the right to have these data transmitted to a different data controller. Where this is technically possible, you are also entitled to ask NORMA Group SE to transmit your personal data directly to the other data controller.

2. You may additionally file complaints with the competent supervisory authority, the Hessian Commissioner for Data Protection and Freedom of Information (*Hessischer Beauftragter für Datenschutz und Informationsfreiheit*), Gustav-Stresemann-Ring 1, 65189 Wiesbaden, P.O Box 3163, 65021 Wiesbaden, Germany.