

## **Information for shareholders and their proxies on data protection regarding the processing of data for the purposes of the Annual General Meeting of Hapag-Lloyd Aktiengesellschaft on 3 May 2023**

We would like to inform you as our shareholder or a proxy herewith about the personal data we process in the context of the preparation, implementation and postprocessing of our Annual General Meeting and about the rights you are entitled to in accordance with the Regulation (EU) 2016/679 (General Data Protection Regulation – GDPR) and the Federal Data Protection Act (BDSG) regarding the processing of your data.

We will hold the Annual General Meeting on 3 May 2023 with the physical presence for properly registered shareholders and their proxies. In addition, there is the option of joining the Annual General Meeting virtually via the online service. Shareholders or their proxies may follow the entire Annual General Meeting live via the online service available at [hapag-lloyd.com/agm/online-service](https://hapag-lloyd.com/agm/online-service) by entering their access data. This online service is operated exclusively on our behalf and in accordance with our instructions by our service provider ADEUS Aktienregister Service-GmbH, Königinstrasse 28, 80802 Munich, Germany.

### **Controller**

Hapag-Lloyd AG  
Ballindamm 25  
20095 Hamburg  
Deutschland

### **Executive Board of Hapag-Lloyd AG:**

Rolf Habben Jansen (CEO), Donya-Florence Amer, Mark Frese, Dr. Maximilian Rothkopf

### **Categories of personal data**

We process the following personal data of our shareholders:

- First and surname, title if applicable, date of birth,
- Address and other contact details,
- Nationality,
- Share-related data (e.g., number of shares, type of ownership of share),
- Access data for the online service, including access data to virtually follow the Annual General Meeting,
- Other data accrued when conducting the Annual General Meeting (e.g., information on motions, questions, granting proxies, nomination proposals and other requests of shareholders or their proxies submitted with a view to the Annual General Meeting as well as your voting behaviour).

In addition, we process the contact details of any proxy authorised by the shareholder (if any).

If shareholders or their proxies contact us, we also process the personal data required to respond to the respective request, such as the email address or telephone number.

If you register for the online service or follow our Annual General Meeting virtually live in picture and sound, we collect the data on the accesses to the website provided by the service provider. This includes, in particular, the following data and device information logged in web server log files:

- Login data,
- Retrieved or requested data,
- Date and time of the retrieval,
- Message whether the retrieval was successful,
- Type of web browser and operating system used,
- Referrer URL (the previously visited page),
- IP address.

Your browser may automatically transmit this data to us when you visit our website.

Please note that when using the online service of ADEUS Aktienregister Service-GmbH, the cookie rules of the provider apply.

#### **Source of personal data**

We, or the service providers we mandate, receive the shareholders' personal data either from the shareholders themselves or from the shareholders' custodian banks that have been mandated to hold our shares in custody.

If you act as a shareholders' proxy, we will receive your personal data from the shareholder who has granted you the authorisation or directly from you if your conduct in the Annual General Meeting is affected.

#### **Purposes and legal basis of the data processing**

We process your personal data in compliance with the provisions of the GDPR, the BDSG, the German Stock Corporation Act (AktG) and other relevant legal regulations.

We process your personal data in order to prepare, conduct and follow up the Annual General Meeting, and in this regard to fulfil our duties towards the shareholders and their proxies, in particular to:

- process the registration to and participation of shareholders and proxies in the Annual General Meeting (e.g., to check the identity, entitlement to participate, send

- out invitations and access data, prepare the attendance list and keep it available for inspection, send out voting rights cards) and
- enable shareholders and proxies to exercise their rights at the Annual General Meeting (including issuing and revoking proxies and instructions, and exercising rights to vote, to propose motions, to make statements, to speak and to receive information as well as the right to object to resolutions of the Annual General Meeting in the manner described in the respective convocation to the Annual General Meeting)

Processing your personal data is necessary for the proper conduct of the Annual General Meeting. If you do not provide us with the necessary personal data or object to the processing, we may not be able to allow you to attend the Annual General Meeting.

The legal basis for these processing operations is Art. 6 (1) lit. c) GDPR in conjunction with our obligations under stock corporation law pursuant to sections 118 et seq. AktG.

We process your personal data in order to comply with our legal obligation to maintain the share register. The processing is necessary to fulfil our obligation under stock corporation law pursuant to section 67 AktG. The legal basis for processing your personal data is Art. 6 (1) lit. c) GDPR.

In addition, your personal data may also be processed to fulfil other legal obligations, such as regulatory requirements as well as storage obligations under stock corporation, commercial and tax law. For example, we are obliged to record the power of attorney when you authorise the voting agent nominated by us for the Annual General Meeting in a verifiable manner and to keep it for three years in an access-protected manner. In these cases, Art. 6 (1) c) GDPR together with the respective statutory rules form the relevant legal basis.

In connection to the Annual General Meeting, we may also submit personal data to our external legal- or tax advisor or auditor as we have a legitimate interest to organize the Annual General Meeting pursuant to the relevant laws and to seek external advice on this. Legal basis to cover this kind of processing is Art. 6 (1) lit. f) GDPR.

We process your personal data also to offer you the online service as a service for shareholders and their proxies in order to exercise your shareholder rights in a user-friendly manner and to be able to follow the Annual General Meeting live in picture and sound. The processing of the above-mentioned access data and device information in web server log files is necessary in order to be able to technically offer our online service as well as for the detection of misuse and troubleshooting. To the extent the processing is technically necessary the legal basis is section 25 (2) No 2 TTDSG. Other processing of personal data is necessary to preserve our legitimate interest to allow our shareholders as well as their

proxies to use the online service and its functions. The legal basis for such processing is Art. 6 (1) lit. f) GDPR.

### **Categories of recipients of data**

Service providers of Hapag-Lloyd AG mandated for the purpose of conducting the Annual General Meeting will receive from Hapag-Lloyd AG only such personal data as are necessary for the performance of the mandated service and will process the data exclusively on behalf of and in accordance with the instructions of the Company (e.g., ADEUS Aktienregister Service-GmbH, Königinstraße 28, 80802 München, to maintain a share register). All our employees and all employees of external service providers who have access to and/or process personal data are obliged to treat this data as confidential.

In connection with the conduct of the Annual General Meeting, your personal data may be disclosed under certain circumstances to other duly registered shareholders or their proxies during the Annual General Meeting or shareholders watching the accessible video and audio transmission of the Annual General Meeting (e.g. by granting access to the list of participants required by law, by publishing on the Company's website the motions or other requests you have made that are subject to publication).

Finally, we may be obliged to transmit your personal data to other recipients, such as when publishing voting rights notifications in accordance with the provisions of the German Securities Trading Act (Wertpapierhandelsgesetz), or to authorities in order to comply with statutory notification obligations (e.g., to financial or criminal prosecution authorities).

Your personal data will generally be processed in countries that belong to the European Union (EU) and the European Economic Area (EEA). Insofar as shareholders come from countries outside the EU or the EEA (third countries), we will also send information to these shareholders (e.g., invitations to general meetings). If these communications also contain personal data (e.g., applications for general meetings including the name of the applicant), this data will also be transmitted to third countries. In third countries, the provisions of the GDPR do not apply directly. Unless there is an adequacy decision by the EU Commission, a lower level of protection for your personal data may exist in these third countries. A transfer is nevertheless necessary in order to inform all shareholders equally, as we may not exempt shareholders from third countries from our duty to inform. With the transfer, we therefore fulfil our contractual obligations. The legal basis for the transfer is Art. 49 (1) (b) GDPR.

### **Storage period and deletion of data**

We will erase your personal data once it is no longer needed for the aforementioned purposes and we are no longer required to continue storing such data in compliance with statutory obligations of documentation and retention (e.g., under the German Stock Corporation Act, the German Commercial Code, the German Fiscal Code or other legislation). In addition, we retain data if this is necessary in connection with claims

asserted against or by our Company or to protect our above-mentioned legitimate interests. Please contact our Investor Relations department if you have specific questions about the storage period.

Hapag-Lloyd Aktiengesellschaft  
Investor Relations  
for the attention of Heiko Hoffmann  
Ballindamm 25  
20095 Hamburg  
E-Mail address: [ir@hlag.com](mailto:ir@hlag.com)

### **Right of data subjects**

Shareholders and their proxies have the following data subject rights, if the legal requirements are met,

- to receive information on data processing and a copy of the processed data (right of information, Art. 15 GDPR),
- to demand the correction of incorrect data or the completion of incomplete data (right to correction, Art. 16 GDPR),
- to demand the deletion without undue delay of personal data (right to deletion, Art. 17 GDPR),
- to demand the restriction of data processing (right to restrict processing, Art. 18 GDPR), as well as
- to receive personal data concerning them that they have provided to a controller in a structured, common and machine-readable format, and also to transmit these data to another responsible person without hindrance by the responsible party (right to data portability, Art. 20 GDPR).

**If we process your data to protect the legitimate interests of Hapag-Lloyd Aktiengesellschaft or of a third party, you have the right to object to any such processing on specific grounds relating to your particular situation opposing to this data processing. In such case, we will cease the processing of your data unless we can provide evidence of compelling legitimate grounds for the processing that override your interests, rights and freedoms or if the processing serves the purpose of asserting, exercising or defending legal claims.**

If we process your data based on your consent, you have the right to revoke your consent at any time with future effect. We would then immediately stop any such processing of personal data relating to you which is based on your consent, unless there is another, alternative legal basis for processing.

You can assert the aforementioned rights against Hapag-Lloyd Aktiengesellschaft free of charge via the email address [dataprotection@hlag.com](mailto:dataprotection@hlag.com) or via the following contact details:

Hapag-Lloyd Aktiengesellschaft  
- Executive Board -  
for the attention of Heiko Hoffmann  
Ballindamm 25  
20095 Hamburg  
E-Mail address: [ir@hlag.com](mailto:ir@hlag.com)

You also have the right of complaint to the data protection supervisory authorities in accordance with Art. 77 GDPR. The supervisory authority of the Free and Hanseatic City of Hamburg responsible for Hapag-Lloyd Aktiengesellschaft is: Der Hamburgische Beauftragte für Datenschutz und Informationsfreiheit, Ludwig-Erhard-Str. 22, 20459 Hamburg, Tel.: +49 (0)40 42854-4040, E-Mail: [mailbox@datenschutz.hamburg.de](mailto:mailbox@datenschutz.hamburg.de).

You may reach the Company Data Protection Officer at:

Hapag-Lloyd Aktiengesellschaft  
Corporate Data Protection (Datenschutzbeauftragter)  
for the attention of Mr. Steffen Wischmeyer  
Ballindamm 25  
20095 Hamburg  
E-Mail address: [dataprotection@hlag.com](mailto:dataprotection@hlag.com)

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