



Status March 2021

Data Protection Information regarding the virtual Annual General Meeting of Henkel AG & Co. KGaA 2021

General

Henkel AG & Co. KGaA, Düsseldorf (referred to as "Henkel" in the following) respects the private domain of every individual. We take the protection of data relating to our shareholders or their proxy-holders very seriously. The following information relates to the processing of your personal data by Henkel and the rights to which you as a shareholder or as a proxy-holder are entitled under data protection law, and in particular under the EU General Data Protection Regulation (GDPR).

Who is responsible for data processing?

Henkel AG & Co. KGaA
Henkelstrasse 67
40589 Düsseldorf
Phone: +49 211 797-2137
Fax: +49 211 797-12137

For what purpose and on what legal basis is your data processed? Who do we get the data from?

We process your personal data in compliance with the EU General Data Protection Regulation (GDPR), the Federal Data Protection Act (BDSG), the German Stock Corporation Act (AktG), the Act on Mitigation of the Consequences of the COVID 19 Pandemic in Civil, Insolvency and Criminal Proceedings of 27 March 2020 (Federal Law Gazette I., 2020, p. 569) as amended by Article 11 of the Act on the Further Shortening of the Residual Debt Relief Procedure and on the Adjustment of Pandemic-Related Provisions in the Company Law, Cooperatives, Associations and Foundations and in the Law on Tenancy and Leases of December 22, 2020 (Federal Law Gazette I. No. 67, 2020, p. 3328) ("COVID Mitigation Act") and all other relevant legal provisions.

All Henkel shares – ordinary and preferred – are bearer shares. Unlike in the case of registered shares, Henkel does not maintain a share register within the meaning of Section 67 of the German Stock Corporation Act; such a register would contain the name, date of birth and address of the shareholder and the number of shares held.

We use your personal data (such as name, address, number of shares, class of shares, type of ownership of shares, the number of your access card, the assignment of a proxy and the issue of instructions) on the basis of applicable data protection laws to enable shareholders to participate in and exercise their rights at the virtual Annual General Meeting.

Henkel will be broadcasting the virtual Annual General Meeting on the Internet via the Henkel InvestorPortal, and also enabling shareholders' rights also to be exercised via the Henkel InvestorPortal. The personal data of shareholders and of their proxy-holders who make declarations, submit questions or object to resolutions of the virtual Annual General Meeting may be processed. The legal framework for the processing of such data is provided by Article 6 (1) sentence 1 point f) GDPR. Henkel AG & Co. KGaA is broadcasting the Annual General Meeting on the internet via the Henkel InvestorPortal and is enabling shareholders' rights to be exercised via the Henkel InvestorPortal. The personal data of shareholders who submit questions or video messages, or object to resolutions of the Annual General Meeting may be processed. In addition, data processing may be undertaken as necessary for the organization of the Annual General Meeting. The legal framework for these processing operations on the basis of overriding legitimate interests is Article 6 (1) sentence 1 point f) GDPR. Henkel AG & Co. KGaA generally receives the personal data of shareholders via the registration office from the credit institution which the shareholders have entrusted with the safekeeping of their shares (i.e. their custodian bank). In some cases, Henkel AG & Co. KGaA may also receive personal data directly from shareholders.

The service providers of Henkel AG & Co. KGaA appointed for the purpose of preparing and conducting the Annual General Meeting receive from Henkel AG & Co. KGaA only such personal data as are necessary for

the execution of the commissioned service, and process the data exclusively in accordance with instructions issued by Henkel AG & Co. KGaA only and to the extent that is necessary for the execution of the commissioned service. All employees of Henkel AG & Co. KGaA and the employees of commissioned service providers who have access to and/or process personal data relating to shareholders or shareholder representatives are obligated to treat such data as confidential. In addition, personal data of shareholders or shareholder representatives exercising their voting rights will be made available to other shareholders and shareholder representatives who follow the virtual Annual General Meeting by means of an electronic link within the framework of the statutory provisions (in particular the list of participants, Section 129 AktG). This also applies to questions that shareholders or shareholder representatives may have submitted in advance (Article 1 (2) sentence 1 No. 3, sentence 2 Act on Mitigating the Consequences of COVID-19), to statements submitted in advance with reference to the Agenda, and in the context of an announcement of shareholder requests for additions to the Agenda, as well as countermotions and election proposals. Henkel AG & Co. KGaA may also be obligated to disclose personal data relating to shareholders or shareholder representatives to other recipients, such as public authorities for the purpose of complying with statutory notification requirements.

The processing of your personal data is technically and legally mandatory for exercising your shareholders' rights in the virtual Annual General Meeting, in particular for exercising voting rights and viewing the complete transmission of the virtual Annual General Meeting in sound and vision, and also to enable the Meeting to be conducted in this form. The legal framework for the processing of such data is provided by Article 6 (1) sentence 1 point c) of the EU General Data Protection Regulation (GDPR) in conjunction with Sections 118 ff. of the AktG and in conjunction with Article 1 Section 1 of the COVID-19 Mitigation Act.

In connection with providing video messages, the personal data of shareholders and shareholders representatives are processed and published according to section 6, paragraph 1 a), GDPR. The video messages will be deleted after the virtual Annual General Meeting.

In addition, we may process your personal data to meet further legal obligations such as regulatory requirements and binding provisions under stock corporation, security trading, commercial and tax law. In order to comply with provisions under stock corporation law – for example, when authorizing the proxies nominated by Henkel for the Annual General Meeting – we must verifiably record the data that serves as proof of authorization and store this with access protection for three years (Section 134 para. 3 sentence 5 AktG). The legal framework for the processing of said data in this case is provided by relevant legal provisions in conjunction with Article 6 para. 1 c) GDPR.

In addition to the processing as permitted by law, we process personal data to pursue our legitimate interests as set forth in Article 6, Paragraph 1 f) of the GDPR:

We have a legitimate interest in ensuring the proper conduct of the virtual Annual Stockholders' Meeting.

If you submit questions prior to the virtual Annual General Meeting in accordance with Article 2 Sec. 1 (2) of the COVID Mitigation Act in conjunction with the requirements of the invitation to the virtual Annual General Meeting or lodge an objection to resolutions of the virtual Annual General Meeting, we process the name and address of the shareholder and the number of his or her access card for the purpose of processing these questions or objection. If you authorize a third party to attend the virtual Annual General Meeting, we will also process the name and address of the proxy in order to ensure that the Annual General Meeting is properly conducted. The legal basis for this is provided by the relevant provisions of the Stock Corporation Act in conjunction with article 6, paragraph 1 c) GDPR.

There is also a legitimate interest in being compliant to non-European securities regulations. For example in the event of capital increases, we must exclude individual shareholders from notification concerning subscription offers on account of their citizenship or place of residence to comply with the securities laws of the countries in question.

If we intend to process your personal data for a purpose other than those indicated above, we will notify you in advance of any processing as required by law.

With which categories of recipients might we share your data?

Internal:

Within Henkel AG & Co. KGaA, access to your data is given to persons who need it for the performance of our obligations to you.

External service providers:

We make use of external service providers (AGM service providers, service providers for printing and mailing of statutory shareholder notifications) to prepare and conduct our Annual General Meetings. The service providers of Henkel AG & Co. KGaA appointed for the purpose of preparing and conducting the Annual General Meeting receive from Henkel AG & Co. KGaA only such personal data as is necessary for the execution of the commissioned service, and process the data exclusively in accordance with instructions issued by Henkel AG & Co. KGaA.

If these service providers have access to our shareholders' data, it will be in the context of what is called "processing on behalf," which is expressly provided for by law (Article 28 of the GDPR).

Other recipients:

If you or a person authorized by you participate in the Annual General Meeting, other Henkel shareholders may view any personal data recorded in the list of participants in accordance with Section 129 para. 1 sentence 2 AktG. In addition, we may transfer your personal data to other recipients, such as to public authorities, in order to fulfill legal notification obligations (e.g. if the statutory voting right thresholds are exceeded). The list of participants is also available to Henkel shareholders on request for up to two years after the Annual General Meeting.

We also transmit, if required and admissible, your data to other recipients who process information about you on their own responsibility as permitted by law. These recipients include, for example, government authorities for compliance with legal reporting obligations (such as when stock ownership thresholds specified by law are exceeded).

How long do we store your data?

As a matter of principle, we will always render your personal data anonymous or delete it as soon as it is no longer required for the aforementioned purposes, unless we are obliged to keep it stored by other statutory retention and verification regulations (e.g. pursuant to the German Stock Corporation Act, German Commercial Code or German Fiscal Code). For data gathered in relation to Annual General Meetings, the retention period is generally up to 3 years. Beyond this, we will only retain personal data in individual cases if this is necessary in connection with claims asserted against our company.

What are your rights as a "data subject"?

You can request information about your personal data stored at the above address. Under certain circumstances, you may also request the deletion or correction of your data or impose a processing bar or restriction (e.g. if your data is being used unlawfully).

At any time, you may assert the right to access your data. Additionally, provided that the respective requirements are met, you may assert the following rights:

- Right to rectification
- Right to erasure
- Right to restriction of processing
- Right to data portability
- Right to lodge a complaint with the respectively competent data protection supervisory authority:

Landesbeauftragte für Datenschutz und Informationsfreiheit Nordrhein-Westfalen
 Kavalleriestr. 2-4
 40213 Düsseldorf
 Phone: +49 211 38424-0
 Fax: +49 211 38424-10
 Email: poststelle@ldi.nrw.de

In these cases, or if you have any other questions or wishes in connection with regard to your personal data, please send an e-mail or a letter to our data protection officer, Mr. Frank Liebich, Henkel AG & Co. KGaA, Henkelstrasse 67, D 40191 Düsseldorf, Germany (Email: datenschutz@henkel.com).

Right to object claims

In case of processing activities involving your personal data that are carried out on basis of a legitimate interest of Henkel, you have the right to object against such processing of your personal data at any time for reasons resulting from your specific situation. Henkel will stop that processing unless Henkel can prove important reasons for the processing which deserve protection which outweigh your interests, rights and freedoms or if the processing serves to assert, exercise or defend against legal.

Further information regarding financial instruments issued by Henkel

Company:	Henkel AG & Co. KGaA
Address:	40191 Düsseldorf, Germany
Henkel Preferred Share:	ISIN DE0006048432 // WKN 604843
Henkel Ordinary Share:	ISIN DE0006048408 // WKN 604840
Listing:	Regulated market (Prime Standard), all eight German Stock Exchanges

For further financial instruments see www.henkel.com/ir