



Mercedes-Benz

Information about data protection for Mercedes-Benz Group AG shareholders and for proxies of shareholders

Thank you for your interest in Mercedes-Benz Group AG's General Meeting and/or the InvestorPortal for shareholders and their proxies. Protecting your personal data is our top priority. In the following privacy notice, we explain how your personal data is processed. You will also learn about your rights related to the processing of your personal data.

As you know, we are legally obliged to maintain a share register because we issue registered shares. If you provide us with personal data for the share register or for conducting our General Meeting – in particular by regular mail, e-mail or via the InvestorPortal (<https://group.mercedes-benz.com/investorportal>) –, or we collect personal data about you or your intermediary or if you notify us of changes to personal data stored on you in Mercedes-Benz Group AG's share register, we will process your personal data as described below.

Information on which personal data we collect and store when you visit our website at group.mercedes-benz.com can be found at group.mercedes-benz.com/privacy/. Information on which personal data are processed when you visit the InvestorPortal of our service provider Computershare Deutschland GmbH & Co. KG can be found under <https://group.mercedes-benz.com/investorportal> -> **Data protection**.

1. To whom does this privacy notice apply?

The following notice applies to Mercedes-Benz Group AG shareholders and to their proxies.

In addition to this privacy notice, there may be other privacy notices for certain service components.

2. Who is responsible for the processing of my data and whom can I contact about data protection?

Controller of the processing of personal data described below is:

Mercedes-Benz Group AG
Mercedesstraße 120
70372 Stuttgart
Germany
E-Mail: dialog@mercedes-benz.com

The contact information for the Data Protection Officer is as follows:

Mercedes-Benz Group AG
 Chief Officer Corporate Data Protection
 HPC E600
 70546 Stuttgart
 Germany
 E-Mail: data.protection@mercedes-benz.com

3. What categories of personal data do we process?

In order to prepare and conduct the General Meeting, in addition to the personal data (e.g., name, address, e-mail address, telephone number, date of birth, nationality, voting instructions, type of share ownership and number of shares held, individual access data for the InvestorPortal) of/by the shareholders (persons entered in the share register), we may also process the name and contact details of any proxies.

If you visit the InvestorPortal, certain data and hardware information will be documented in the webserver log files. This can be, for example, the following data:

- Retrieved or requested data;
- Date and time of the retrieval;
- Message as to whether the retrieval was successful;
- Type of web browser and operating system used, if applicable;
- IP address.

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

In addition, we also process information on motions, nominations, objections, video messages and other requests by shareholders or their proxies submitted in relation to the General Meeting, as well as on their voting behaviour.

4. For which purposes and on which legal basis do we process your personal data?

We process your personal data in compliance with the EU General Data Protection Regulation (GDPR), the German Federal Data Protection Act, the German Stock Corporation Act (AktG) and all other relevant legislation.

a) Preparing, conducting and following up on the virtual General Meeting

We use personal data received from your intermediaries as well as personal data provided by you or which in any other way is collected from you via the InvestorPortal to update our share register based on your information and to prepare, conduct, and follow up on the virtual General Meeting, in particular to

- process the registration and connection of shareholders and their proxies to the virtual General Meeting (e.g., to check authorization to exercise shareholder rights and to follow the transmission via the InvestorPortal, to prepare the list of attendees and making it available for inspection, to send access data),
- make the InvestorPortal available to you, and to enable you as a shareholder to exercise your rights at or in connection with the General Meeting (in particular the granting and revocation of powers of attorney and instructions and exercise of voting, proposal, statement, speech and information rights as well as the right to object to resolutions of the General Meeting in the manner described in each case in the invitation to the General Meeting), and
- fulfill the legal obligations to maintain a share register pursuant to Section 67 of the AktG (shares of Mercedes-Benz Group AG are registered shares; the shareholder is generally obligated to provide the company with this information).

The processing of your personal data is legally mandatory for you to vote and for the virtual General Meeting to be conducted properly in accordance with the provisions of the AktG.

If you attend our virtual General Meeting as a guest, we process the following data about you: name, contact details, and individual access data for the InvestorPortal (shareholder or access number and password).

The legal basis for processing your personal data and the personal data of proxies is Art. 6 (1c) of the GDPR in conjunction with Section 67e (1) of the AktG and our obligations under stock corporation law pursuant to Sections 67, 118 et seqq. of the AktG. Personal data beyond the information required by Sections 67 and 67e (1) of the AktG (such as processing your data in connection with the submission of video messages) and those of guests are processed on the basis of Art. 6 (1) lit. f) of the GDPR. The legitimate interest is to provide you with easy access to your data, to offer you selected services in the InvestorPortal, and to provide you with or send you documents electronically if necessary.

In connection with preparing, conducting and following up on the virtual General Meeting, we may also transmit your data to our legal advisers, tax advisers or auditors, as we have a legitimate interest in organising the virtual General Meeting in accordance with the relevant legal provisions and in obtaining external advice for this purpose. The legal basis for this processing is Art. 6 (1f) of the GDPR.

b) Processing for the fulfilment of other legal obligations

Your personal data will also be processed to fulfil any legal reporting and publication obligations. In addition, your personal data may also be processed to satisfy further legal obligations such as regulatory requirements as well as retention obligations under stock corporation law, commercial law and tax law. We are required, for example, to record the power of attorney granted to the

proxy designated by us for the General Meeting so that it can be verified for a period of three years. The relevant statutory provisions in conjunction with Art. 6 (1) lit. c) of the GDPR serve as the legal basis for processing data in these cases.

- c) Communicating with shareholders, providing corporate information and maintaining shareholder contact (investor relations)

In addition, we process your data to communicate with you as a shareholder. In particular, we use your e-mail address to send you information relevant under securities law, such as the notice convening the General Meeting, if you have expressly consented to the transmission of such information by means of remote data transmission in accordance with Section 49 (3) no. 1 lit. d) of the German Securities Trading Act (WpHG) or have not objected to a request for consent in text form within a reasonable period of time and have not withdrawn your consent at a later date. Your personal data may also be processed for the purpose of providing corporate information and maintaining contact with our shareholders (investor relations). The legal basis for this processing is Art. 6 (1) lit. c) of the GDPR in conjunction with Section 67e (1) of the AktG.

5. To which categories of recipients will we potentially forward your data?

External service providers:

We partly use external service providers for the administration and technical management of the share register, as well as for preparing and conducting the General Meetings. Our partners are companies in the following categories: service providers for maintaining the share register, IT service providers, service providers for preparing and conducting the General Meetings and their subcontractors.

Other recipients:

We may also send your personal data to other recipients such as public authorities in order to meet statutory disclosure obligations (e.g., if a legally specified voting-rights threshold is exceeded, or to financial authorities or law enforcement agencies). Within Mercedes-Benz Group AG, employees have access to your personal data if that is necessary to fulfil our duties to you.

In connection with preparing, conducting and following up on the General Meeting, we may also transfer your personal data to our legal advisers, tax advisers or auditors.

In connection with conducting the General Meeting, your personal data may, under certain circumstances, be disclosed to other duly registered shareholders or their proxies and, if applicable, to guests watching the publicly accessible video and audio broadcast of the General Meeting (e.g., by granting access to the legally required list of attendees, by publishing on the company's website the motions or other requests that you have submitted and that must be published, by making statements available on the company's website, stating your name, or by other contributions that you make in the preparation for or during the General Meeting via the communication channels described in the invitation to the General Meeting).

6. How long do we store your data?

We generally delete your personal data as soon as it is no longer required for the aforementioned purposes, unless we are obliged by law to provide proof and keep records (e.g., under the German Stock Corporation Act, the German Commercial Code, the German Fiscal Code). The storage period for personal data recorded in conjunction with General Meetings is generally 3 years, unless a shorter storage period, e. g., pursuant to Section 67e (2) AktG is legally required. Countermotions and election proposals are stored for 5 years. Beyond that, we store personal data only under special circumstances, if required to do so in connection with claims asserted against our Company.

7. Data sources

We, or the service providers commissioned by us, receive the personal data of the shareholders either from the shareholders themselves, or via Clearstream Banking Frankfurt from the credit institutions or other intermediaries of the shareholders.

If you act as a proxy for a shareholder, we will receive your personal data from the shareholder who has granted you power of attorney and directly from you if your behaviour during the virtual General Meeting or your use of the InvestorPortal is affected.

8. How do we transfer data to non-European countries?

Should we transmit personal data to service providers or other recipients outside the European Union (EU) and the European Economic Area (EEA) (Third Countries), this transmission only occurs if the European Commission has confirmed that the third country has an adequate level of data protection or if other appropriate data protection safeguards are in place. To the extent that persons from countries outside the EU and the EEA hold shares in our company, we will also send these shareholders information (e.g., invitations to General Meetings) which may also contain personal data (e.g., motions to General Meetings stating the name of the applicant). Transfer is necessary in order to inform all shareholders equally, as we may not exempt those 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) lit. b) GDPR.

9. What rights do you have as a data subject?

You have the following rights as a data subject - where the statutory requirements have been met - in connection with the processing of your personal data:

- the right to access information about the data stored by us (Art. 15 GDPR);
- the right to have your data rectified (Art. 16 GDPR);
- the right to have your data erased (Art. 17 GDPR);
- the right to restrict the processing of your data (Art. 18 GDPR);
- the right to data portability (Art. 20 GDPR);

- the right to lodge a complaint with a supervisory authority (Art. 77 GDPR).

Insofar as we process your data to protect the legitimate interests of Mercedes-Benz Group AG or a third party, you are entitled to object to this processing for reasons that arise from your particular situation. In this case, we will no longer process your personal data unless we can provide evidence of compelling legitimate grounds for the processing that override your interests, rights and freedoms or if processing serves the purpose of asserting, exercising or defending legal claims (Art. 21 GDPR).

If we process your personal data on the basis of consent you have given us, you have the right to withdraw that consent at any time with effect for the future. This does not affect the lawfulness of the processing of your personal data until withdrawal. The withdrawal is to be addressed to the aforementioned controller.

10. Would you like to assert your rights?

You have the option of contacting our Data Protection Officer (above, section 2) to assert your rights mentioned in section 9 or a data protection supervisory authority to complain.