

Information on data protection for shareholders of McKesson Europe AG

1. Who is responsible for data processing?

The entity (controller) responsible for processing your personal data is:

McKesson Europe AG
Stockholmer Platz 1
70173 Stuttgart
Phone: + 49 711 5001-00
Fax: + 49 711 5001-1260
Email: service@mckesson.eu

You can contact the responsible Data Protection Officer of McKesson Europe AG with questions regarding this data protection information by post or by email at the following address:

McKesson Europe AG
Data Protection Officer
Stockholmer Platz 1
70173 Stuttgart
Phone: +49 711 5001-00
Fax: +49 711 5001-1260
Email: privacy@mckesson.eu

2. What personal data do we process and where do we obtain it from?

We process your following personal data:

- Personal details (e.g. first and last name, title if applicable, birth name if applicable, date of birth, gender, nationality, occupation/industry, address, including a history of changes of address and other contact data (e.g. shipping address)),
- Shareholder data (shareholder number, shareholder category (natural or legal person), investment date),
- Information on your share portfolio (history of inflows and outflows, including nominal values, registration and transaction date, processing bank),
- If applicable, name and address of your authorised representative.

Our shares are registered shares. With regard to registered shares, Section 67 AktG [German Stock Corporation Act] stipulates that these must be entered in our company's share register, along with the name, date of birth, shareholder's address, number of shares or share number and, in the case of par value shares, the amount. As a shareholder, you are legally obliged to provide us with this information. The banks involved in the acquisition or custody of your registered shares in our company generally forward the information relevant for maintaining the share register to Computershare Deutschland GmbH & Co. KG, which manages the share register on behalf of our company. These data are forwarded via Clearstream Banking AG, which is based in Frankfurt am Main and acts as the central securities depository for the technical settlement of securities transactions and custody of the shares on behalf of banks. Computershare Deutschland GmbH & Co. KG also informs us about the removal of your shares from the share register.

In addition to the personal data stored in our company's share register, we process data that you provide when registering for the Annual General Meeting or that your custodian banks send to us for this purpose (such as your telephone number, email address, and nationality).

3. For what purposes and on what legal basis will your data be processed?

We process your personal data in compliance with the regulations of the General Data Protection Regulation [GDPR], the German Data Privacy Act [BDSG], the German Stock Corporation Act [AktG] and all other relevant legal regulations.

When we use your personal data, we do so according to the intended purposes of the German Stock Corporation Act. These include maintaining the share register, communication with shareholders and various procedures in the context of the handling of Annual General Meetings. Personal data is processed in connection with Annual General Meetings for the purpose of processing the registration and participation of shareholders in the Annual General Meeting (e.g. examination of the right to attend, compilation of the list of participants) and to enable shareholders to exercise their rights in the context of the Annual General Meeting (including the granting and revocation of proxies). The legal basis for processing your personal data is the German Stock Corporation Act in conjunction with Article 6(1)(c) GDPR.

Furthermore, we process data transferred to us by you or other parties subject to notification obligations (notifiers) in the context of the notification of voting rights according to the German Securities Trading Act [WpHG]. The legal basis for the processing in these cases is also the respective statutory provisions in conjunction with Article 6(1)(c) GDPR. In addition, your personal data may also be processed to meet further legal obligations such as regulatory requirements and retention obligations according to stock corporation, commercial and tax law. For example, we are obliged to record the proxy declaration when authorising the proxy nominated by us for the Annual General Meeting in a verifiable manner and to keep it in a safe place, protected from access, for three years. In these cases, too, Article 6(1)(c) GDPR constitutes the relevant legal basis. We are also entitled to use your data for the protection of our legitimate interests or the legitimate interests of a third party in accordance with Article 6(1)(f) GDPR. This is the case, for example, when we compile analyses and statistics (e.g. for the presentation of the shareholder structure and development, trading volumes or an overview of the major shareholders) or if we have to exclude individual shareholders or groups of shareholders from information on subscription offers due to their nationality or place of residence in order not to violate the laws of certain countries. A legitimate interest also exists if we wish to prevent or detect illegal activities, fraud or similar threats in order to protect ourselves from harm. Before we process your data on the basis of our legitimate interests, we will in each individual case check whether our interests outweigh your interests. You can obtain further information on such a consideration of interests from our Data Protection Officer at the address listed under point 1. If we wish to process your personal data for a purpose not previously mentioned, we will inform you in advance according to the legal provisions and, if necessary, obtain your consent.

4. Who do we share your data with?

Computershare Deutschland GmbH & Co. KG in Munich has been engaged to deal with the technical management of the share register of McKesson Europe AG. We use external service providers for organising the Annual General Meetings, e.g. service providers for printing and mailing invitations to the Annual General Meeting and notifications to shareholders, as well as for holding the Annual General Meeting (essentially the review of attendance, technical infrastructure for voting and documentation of the Annual General Meetings). However, the service providers that we have engaged only receive personal data from us which are necessary for the performance of their service and they process the data exclusively according to our instructions.

Other shareholders and attendees of the Annual General Meeting may view their data contained in the list of participants during the meeting and, as the case may be, for a period of up to two years thereafter. If a shareholder requests that items be placed on the agenda, we will publish such items, stating the name of the shareholder, provided that the requirements under German stock corporation law are met. According to the provisions of German stock corporation law, we will also make counter motions and election proposals from shareholders available on the company's website, stating the name of the shareholder, provided that the requirements are met. We also use external service providers to carry out the analyses mentioned in point 3.

Finally, we may be obliged to transfer your personal data to other recipients, such as when publishing notifications of voting rights in accordance with the provisions of the German Securities Trading Act, or to authorities in order to meet legal notification obligations (e.g. to financial or law enforcement authorities).

5. How long do we store your data for?

We delete or anonymise your personal data as soon as they are no longer required for the above-mentioned purposes and unless we are obliged to store the data for a longer period of time due to statutory duties of proof or retention obligations (e.g. in accordance with the German Stock Corporation Act, the German Commercial Code, the German Fiscal Code or other legal provisions). The data recorded in the share register are stored by us during the period you hold shares and are regularly retained for at least another ten years after the complete sale of your shares on the basis of the duties of proof and retention under commercial and tax law. In addition, we store data if they are required in connection with claims asserted against or by our company or to protect our above-mentioned legitimate interests. Based on the legal statute of limitations, this can lead to a retention period of three to thirty years.

6. What rights do you have under data protection law?

With regard to your rights relating to your personal data collected and stored by us, please refer to our general privacy statement, which can be accessed from the following link: <https://www.mckesson.eu/mck-en/data-protection/616>.

To assert the rights listed there, please contact our Data Protection Officer at the address listed in point 1.

Last updated September 2018