

Data Privacy Notice for guests of the General Meeting of Vonovia SE

1. General Information

a) Introduction

Vonovia SE takes your privacy and the protection of your personal data very seriously. In this data privacy notice, we want to inform you about which personal data we process from you as guest of our General Meeting and which rights you have under Regulation (EU) 2016/679 (General Data Protection Regulation – GDPR) and the German Federal Data Protection Act (*Bundesdatenschutzgesetz*, BDSG) with regard to the processing of your data.

We will conduct the General Meeting in 2020 as an assembly without presence using means of remote communication (virtual General Meeting). Therefore, neither shareholders nor guests can physically participate in the General Meeting. In order to enable selected, registered guests to follow the virtual General Meeting nevertheless, with the help of our service provider, Computershare Deutschland GmbH & Co. KG, Elsenheimerstr. 61, 80687 München, we will provide a webcast of the virtual General Meeting, which can be accessed via a password-protected link.

b) Data controller

Vonovia SE
Universitätsstraße 133
44803 Bochum, Germany
Fax: +49 (0) 234 314 2944
Email: hauptversammlung@vonovia.de

c) Contact details of the Data Protection Officer

Dr. Stefan Drewes
c/o Vonovia SE
Postbox 44784
Bochum, Germany
Email: datenschutz@vonovia.de

2. Information concerning the processing

a) Categories of data

As the controller within the meaning of data protection laws we process the following of your personal data:

- name and surname, title
- position/function (if applicable)

- business name
- address
- e-mail address
- If applicable, remarks (e.g. accompanying person of shareholder X at non-virtual General Meetings)

If you contact us, we additionally process the personal data required to answer the respective request, such as your telephone number or the content of your request.

If we broadcast a non-virtual General Meeting live on the Internet by means of video and audio transmission and you enter the recording area, this live broadcast will also include your appearance.

If you access the webcast of our (virtual) General Meeting, we also process the access password, which we will send you after registration, and the access data required for the operation of our webcast, which your browser automatically transmits to us when you access the website (e.g. IP address, data retrieved or requested; date and time of access; notification whether the request was successful; type of web browser used). If we use cookies in the provision of the webcast, we will only do so if this is necessary for the operation of the webcast or if you have given your consent. We will inform you separately about the use of cookies on the website on which you will find our webcast.

b) Purpose and legal basis of the processing

We process the data described under a) in order to be able to prepare, conduct and follow up our General Meeting as a non-public event and to ensure that only authorized persons can exercise their rights to participate. In particular, we compile a guest list, send out guest tickets or access data (also via e-mail), carry out admission/access controls and document your presence as a guest at the General Meeting. With respect to a virtual General Meeting, we process your data to ensure that only selected guests can follow the video and audio transmission of the virtual General Meeting. The legal basis for the processing of your personal data is Art. 6(1)(f) GDPR. Our legitimate interest lies in, if applicable, exercising our property rights, protecting the voting rights of our shareholders and ensuring an orderly course of the General Meeting. Without this processing of your personal data, you cannot participate as guest in the General Meeting.

We process the data described under a), which you provide us in the course of contacting us, in order to be able to process and solve your request. The legal basis for the processing is Art. 6(1)(f) GDPR. Our legitimate interest is to provide a functioning customer contact.

The entire General Meeting may be broadcast live and publicly accessible on the Internet by means of video and audio transmission. Possibly, a recording of the virtual or non-virtual General Meeting will be made until the end of the speech of the Management Board, which will be made publicly available on the Internet on demand after the end of the General Meeting. Beyond this, neither image nor sound recordings will be made. To the extent you enter the recording area during recording activities at a non-virtual General Meeting, this live broadcast or the respective recording will include your appearance. The legal basis for this processing is Art. 6 (1)(f) GDPR. Our legitimate interest is to enable interested shareholders and the public

to follow the General Meeting via the Internet in accordance with the express permission in the German Stock Corporation Act and our by-laws.

The processing of access data, device information and necessary cookies as described under a) is necessary to technically provide the webcast of the (virtual) General Meeting, as well as for misuse detection and troubleshooting. In this respect, we have a legitimate interest in providing this webcast to you as guest in order to follow the virtual General Meeting without physical presence. The legal basis for this processing is Art. 6 (1) lit. f) GDPR.

c) Recipients and categories of recipients of personal data

As part of the preparation, conduct and follow-up of General Meetings, we commission service providers who receive personal data from data subjects (e.g. for the provision of the webcast of the virtual General Meeting; printing companies for sending General Meeting documents, security services for admission controls).

Our service providers only receive such personal data from us that is necessary for the performance of the commissioned service, and they process the data exclusively on behalf and in accordance with the instructions of Vonovia SE. 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 confidentially.

3. Data sources

We receive your data either directly from you, in particular if you yourself have applied for an admission as guest (e.g. as a representative of the media or public authorities), from one of our shareholders requesting your admission as a guest, or, if applicable, in the course of our business from internal or external sources, some of which are publicly accessible.

4. Storage period

In principle, we anonymise or delete personal data if it is no longer required for the above-mentioned purposes and if the anonymising or deleting does not conflict with legal requirements for proof and storage (e.g. under the German Stock Corporation Act, the German Commercial Code, the German Tax Code or other legal provisions).

Please contact our data protection officer if you have further questions about the storage period.

5. Rights of data subjects

As a data subject, you can contact our data protection officer named in 1. c) in order to exercise your legal rights in accordance with the GDPR. If the legal requirements are met, you may be entitled to the following rights:

- the right to obtain information on data processing and a copy of the data processed (right of access by the data subject, Art. 15 GDPR)
- the right to obtain the rectification of inaccurate data or have incomplete data completed (right to rectification, Art. 16 GDPR),
- the right to obtain the erasure of personal data without undue delay (right to erasure, Art. 17 GDPR),
- the right to obtain restriction of processing personal data (right to restriction of processing, Art. 18 GDPR)
- the right to receive the personal data concerning you, which you have provided to a controller, in a structured, commonly used and machine-readable format and the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided (right to data portability, Art. 20 GDPR)

Where we process your personal data for the purposes of the legitimate interests pursued by our company or a third party, you also have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you (right to object, Art. 21 GDPR). The processing of personal data will then be cancelled, unless we demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

Regardless of this, you have the right to lodge a complaint with a competent supervisory authority pursuant to Art. 77 GDPR.

Vonovia SE
The Management Board
