

Data Privacy Notice for shareholders of Vonovia SE, authorised representatives of shareholders and guests of the General Meeting

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 our shareholder or your authorised representative in general and in connection with the preparation, conduction and follow-up of our General Meetings 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. If you are another participant (guest) at the General Meeting, you will also find information on the processing of your personal data in this data privacy notice.

We will conduct the General Meeting in 2022 as an assembly without presence using means of remote communication (virtual General Meeting) with the possibility of following the virtual General Meeting and exercising voting rights by means of electronic connection (Connection). Shareholders, their authorised representatives and guests can therefore not physically participate in the General Meeting. However, they can follow the entire General Meeting by video and audio transmission via the password-protected online service Vonovia InvestorPortal, which is also used for electronic connection. It can be accessed via <https://investors.vonovia.de/agm>. In addition, to enable certain registered guests to follow the virtual General Meeting, we will provide a webcast with the support of our service provider Computershare Deutschland GmbH & Co. KG, Elsenheimerstr. 61, 80687 Munich, Germany, 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. Categories of data

a) If (i) you purchase Vonovia SE shares, e.g. as part of a share purchase or through a capital increase, (ii) you participate in a General Meeting as a shareholder or authorised representative or (iii) we contact you, we – as the controller within the meaning of data protection laws – process the following of your personal data:

- name and surname, title,
- date of birth (only of shareholders),
- nationality (only of shareholders),
- address,
- Email address,
- class of shares,
- type of ownership of the share,
- number of shares, and
- ticket number or confirmation of registration.

b) If you use our InvestorPortal, via which the virtual General Meeting is also held, we also process the following data:

aa) Access data, login data and cookies.

The following data is logged in the web server log files or in the application database:

- Retrieved or requested data;
- Date and time of the retrieval;
- Message as to whether the retrieval was successful;
- Type of the web browser used;
- Referrer URL (the previously visited page);
- IP address;
- Shareholder number and SessionID;
- Login and password reset.

Your browser automatically transmits this data to us when you visit our InvestorPortal.

If you log in to the InvestorPortal, we process your shareholder number and password. Before using the InvestorPortal for the first time, you will receive an initial password that you can change in the settings. If you use the "Forgotten password" function, we collect your shareholder number and e-mail address in order to produce the forgotten password.

In addition, our InvestorPortal uses HTML5 web storage techniques to dynamically design web pages and add various functionalities. In order to use all the functions of our InvestorPortal, JavaScript must be activated in your browser. The HTML5 web storage techniques we use place small text files on your terminal device and store them there.

We use these techniques to store the following authentication information as well as some context information by means of the so-called session storage function, which recognizes the user when you return to our website during an active session:

- Authentication Token - the virtual "entrance ticket";

- Acceptance of the Terms of Use.

In the web browser, under the help-menu you will find information on how to technically disable the web storage objects from being allowed and on the settings used by your browser to inform you about the placement of a new web storage object. Please note that some functions of our website may no longer be available if web storage objects are deactivated.

We also use technically necessary cookies for our media gallery. Cookies are small files that are placed on your desktop, notebook or mobile device by a website you visit. From this, we can recognize, for example, whether there has already been a connection between your device and our media gallery. The cookies we use do not contain any personal data. You can set your browser so that you are informed about the setting of cookies and only allow cookies in individual cases, exclude the acceptance of cookies for certain cases or in general and activate the automatic deletion of cookies when closing the browser. If you decide against the use of cookies, it may be that not all functions of our media gallery or individual functions are only available to you to a limited extent.

The necessary session cookies we use are only used for the purpose of providing the media gallery. They are necessary for the functions of the media gallery and are deleted when you close your browser. Insofar as we wish to use cookies in the provision of the InvestorPortal that are not absolutely necessary for the operation of the InvestorPortal, such as function or performance cookies, we will only do so if you have given your consent. In this case, we will inform you about our cookies and associated data processing when you visit the InvestorPortal before using cookies and ask for your consent.

bb) Register import for registered shares

In the InvestorPortal, your shareholder data as described below will be stored for your review and, in particular, with the option of changing your e-mail address for the electronic dispatch of invitations. For this purpose, we continuously compare your shareholder data with the share register in order to keep it up to date and to ensure that you continue to hold shares in Vonovia SE.

If you are a registered shareholder, we process the following data:

- Shareholder number,
- First and last name, title,
- date of birth,
- Address (street, house number, postal code, city and country),
- Nationality,
- Number of shares,
- Type of share ownership,
- investment date,
- E-mail address, in particular if you wish to receive electronic messages from us.

You have the option (in addition to your data subject rights described in section 7) of deleting your InvestorPortal account after each General Meeting and no longer using it by sending us an e-mail to aktionaeersportal@computershare.de.

cc) Dispatch and creation of admission tickets or registration confirmations

If you (i) order the dispatch of an admission ticket or registration confirmation in the InvestorPortal, (ii) create an admission ticket or registration confirmation for a third party or authorize a third party, or (iii) have registered for or consented to the electronic dispatch of invitations, we will process the first and last name, postal address and/or e-mail address of you or the respective third party, depending on the dispatch method selected, in order to send the registration confirmation, admission ticket or invitation to the General Meeting to you or the third party.

dd) Other functions of the InvestorPortal

If you use the InvestorPortal, we may also process information that you provide to us when using the other functions of the InvestorPortal, e.g. information on motions, questions, comments, election proposals, objections and other requests or speeches by stockholders and their proxies in or in connection with the General Meeting as well as on their voting behaviour. If we offer a prize draw on the InvestorPortal and you participate in it, we process the e-mail address you provide for this purpose.

c) If you attend the General Meeting as a guest or follow the virtual General Meeting, we process the following data about you: First and last name, title, position/function if applicable, company, address, e-mail address, comments if applicable (e.g., person accompanying stockholder X at non-virtual General Meetings). If you access the webcast of our (virtual) General Meeting as a guest, we also process the access password that we send you after registration, as well as the access data required for the performance of our webcast, which your browser automatically transmits to us when you access the website (e.g. IP address, data accessed or requested; date and time of access; notification of whether access was successful; type of web browser used). Insofar as we use cookies in the provision of the webcast, we only do so to the extent that this is necessary for the performance of the webcast or you have given your consent. We inform you separately about the use of cookies on the website where you can find our webcast.

d) If you contact us, we additionally process the personal data required to answer the respective request, such as your e-mail address or telephone number.

e) In addition, we also process information on motions, questions, election proposals, objections, statements, exercises of voting rights and other requests or speeches by shareholders or their authorised representatives that you send to us outside the InvestorPortal in connection with the General Meeting.

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

g) If you make use of the option to submit an audio or video message or a written statement for publication before or during the virtual General Meeting, we will process, depending on the nature of your contribution, your statement, your video image and/or your voice.

3. Purpose and legal basis of the processing operation

The processing of the above-mentioned data serves the purposes described below.

a) Maintaining the share register and fulfilling legal and supervisory obligations

We process the data described under section 2 a) in order to comply with our legal obligation to maintain the share register.

The processing is necessary to fulfil our obligations under stock corporation law pursuant to Article 9(1)(c)(ii) of the SE Council Regulation (SE-Regulation) in conjunction with Section 67 of the German Stock Corporation Act (AktG). The legal basis for the processing of data is Article 6(1)(c) GDPR in conjunction with Section 67e(1) AktG. In addition, we may process personal data to fulfil other legal obligations, such as regulatory requirements and obligations under stock corporation law, securities law, tax law and commercial law. The legal basis for the processing is Article 6(1)(c) GDPR in conjunction with the respective legal regulations.

b) Preparation, execution and follow-up of General Meetings

We process the data described under section 2 a), b), e) and g) in order to prepare, conduct and follow up on the General Meeting, in particular (i) to process the registration and participation or connection of shareholders and their authorised representatives to the General Meetings (e.g. by checking their eligibility to participate, creation of the list of attendees), (ii) to enable the exercise of their rights at the General Meeting (including granting and revoking powers of attorney and instructions via the Vonovia InvestorPortal on the company's website at <https://investors.vonovia.de/agm>), (iii) to ensure the observance of voting bans, the lawful adoption of resolutions and evaluation of cast votes at the General Meeting, and (iv) to fulfil our obligations towards shareholders and their authorised representatives (e.g. sending electronic confirmation of votes exercised by electronic postal vote).

The processing of your personal data is necessary for the proper conduct of the General Meeting. If you do not provide us with the necessary personal data, we might not be able to allow your attendance in the General Meeting.

The legal basis for the processing is Article 6(1)(c) GDPR in conjunction with Article Art. 9(1)(c) (ii), 53 SE-Regulation, Section 67e(1) AktG and our obligations under stock corporation law pursuant to Section 118 et seqq. AktG and, if applicable, in conjunction with Article 1(2) of the Act on Measures in Corporate, Cooperative, Association, Foundation and Home Ownership Law to Combat the Effects of the COVID 19 Pandemic (Gesetz über Maßnahmen im Gesellschafts-, Genossenschafts-, Vereins-, Stiftungs- und Wohnungseigentumsrecht zur Bekämpfung der Auswirkungen der COVID-19-Pandemie; C19-AuswBekG).

Insofar as we take down in shorthand your verbal contributions described under section 2 f) during the non-virtual General Meeting without being legally obliged to do so, this is done to ensure the proper conduct of the General Meeting and to be able to deal with your questions and motions. The stenographic minutes will not be published. The legal basis for this processing is Article 6 (1)(f) GDPR and our legitimate interest is to ensure that the General Meeting is executed properly and that our shareholders' participation rights can be realized in the best possible way.

In connection with the preparation, conduct and follow-up of the virtual General Meeting, we may also transfer your data to our legal advisors, tax advisors or auditors, as we have a legitimate interest to organize the virtual General Meeting in accordance with the relevant legal provisions and in obtaining external advice on this. The legal basis for this processing is Article 6(1)(f) GDPR.

c) Broadcast of the General Meeting by means of video and audio transmission on the Internet

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 or make a verbal contribution during recording activities at a non-virtual General Meeting, the live broadcast or the respective recording will include your appearance and verbal contribution. The legal basis for this processing is Article 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. However, the General Meeting in 2022 will be broadcasted as a virtual General Meeting only on the InvestorPortal and via a webcast for selected registered guests.

d) Written statements, audio or video messages in the context of a virtual General Meeting

If you make use of the option to submit a written statement or an audio/video message via our InvestorPortal in the run-up to the virtual General Meeting, we will process your personal data contained therein in order to check whether the contribution you have submitted meets our admission criteria, to select contributions to be published on the InvestorPortal or displayed during the virtual General Meeting, and to make your contribution or statement available on the InvestorPortal, stating your name, and/or to play it during the General Meeting. If your statement or audio/video message is published on the InvestorPortal or displayed during the General Meeting, all duly registered shareholders, their authorised representatives and, if applicable, guest viewers will be able to take note of your statement or audio/video message and your name. This processing is necessary to protect our legitimate interest, which is to make the virtual General Meeting as similar as possible to a physical General Meeting and to enable our shareholders or their authorised representatives to participate and comment in a manner as vivid as possible. The legal basis for this processing is Art. 6 (1)(f) GDPR.

If you as a shareholder make use of the option to submit questions via our InvestorPortal in the run-up to the virtual General Meeting, we will also process your questions in order to check how these questions are to be answered during the virtual General Meeting. The legal basis for this is Art. 6(1)(c) GDPR in conjunction with Art. 53 SE Regulation, Section 67e(1) AktG and Section 1(2) sentence 1 no. 2 and sentence 2 C19-AuswBekG. Insofar as your questions are dealt with in the virtual General Meeting, this may be done by mentioning your name. This may be noted by other participants in the virtual General Meeting. This data processing is necessary to protect our legitimate interest in making the virtual General Meeting as similar as possible to a physical General Meeting and the legitimate interest of the other General Meeting participants in knowing the name of a questioner. The legal basis for this processing is Art. 6 (1)(f) GDPR.

e) Communication with shareholders and Investor Relations

We process the shareholder data described in section 2 a) in order to contact you so that we can send you information about our company that we believe is of particular interest to investors. In addition, we use your e-mail address in particular to send you information relevant under securities law, such as the invitation to the General Meeting, if you have expressly consented to the transmission of such information by means of remote data transmission pursuant to Section 49 (3) no. 1(d) of the German Securities Trading Act (Wertpapierhandelsgesetz) or have not objected to a request in text form for consent within a reasonable period of time and have not revoked your consent at a later date.

The legal basis for the processing of your personal data is Art. 6 (1)(c) GDPR in conjunction with Art. 9 (1)(c)(ii) SE Regulation and Sec. 67e(1) AktG.

f) Operation of the InvestorPortal

We process the data of shareholders described in section 2 a), b) and g) in order to be able to offer you the InvestorPortal throughout the year, as well as to detect misuse, eliminate malfunctions and ensure the smooth running of a virtual General Meeting. In the InvestorPortal, you can view your shareholder data and data on your shareholdings, notify us of any changes to your e-mail address, and register or appoint authorised representatives for upcoming General Meetings.

When you register on the InvestorPortal, we process your registration information and access data in order to be able to check your authorization to join the virtual General Meeting as a shareholder or authorised representative or to take preparatory measures.

The processing is necessary to fulfill our obligations under stock corporation law in accordance with Art. 53 SE Regulation in conjunction with Sections 118 et seq. AktG are required. The legal basis for the processing is Art. 6(1)(c) GDPR in conjunction with Art. 9(1)(c)(ii) SE Regulation and Section 67e(1) AktG.

The legal basis for setting the absolutely necessary cookies and accessing the data stored therein, as well as the associated processing of personal data, is Section 25 (2) No. 2 of the German Telecommunications Telemedia Data Protection Act (TTDSG), as this is necessary to provide the InvestorPortal you have requested. The further processing of the information collected by means of the strictly necessary cookies is required to protect our legitimate interest in enabling our shareholders and their authorised representatives to use the media gallery. The legal basis for this processing is Art. 6(1)(f) GDPR.

g) Admission of guests to the General Meeting

We process the data of guests described under 2 c) in order to prepare, hold and follow up our General Meeting as a non-public event and to ensure that only authorised persons can exercise attendance rights. In particular, we create a guest list, send out guest tickets or access data (also by e-mail), conduct admission/access checks and document your presence as a guest at the General Meeting. With regard to the implementation as a virtual General Meeting, your data is processed to ensure that only selected guests can follow the video and audio transmission of the virtual General Meeting. The legal basis for the processing is Art. 6(1)(f) GDPR. Our legitimate interest is to exercise our domiciliary rights, if necessary, to protect the voting rights of our shareholders and to ensure that the General Meeting proceeds in an orderly manner. Without this processing of your data, it is not possible for guests to participate in the General Meeting.

The processing of the access data, device information and necessary cookies mentioned under 2 c) is required to make the webcast of the (virtual) General Meeting technically available to guests and for abuse detection and troubleshooting. In this respect, we have a legitimate interest in making the webcast available to you as a guest so that you can follow the virtual General Meeting even without being physically present. The legal basis for setting the absolutely necessary cookies and accessing the data stored therein is Section 25 (2) No. 2 TTDSG and otherwise Article 6 (1)(f) GDPR.

h) Subscription offers for capital increases

We process the data of shareholders described under section 2 a) in order to be able to make you subscription offers. A subscription offer gives you the opportunity to acquire new shares. As a rule, this will be delivered to you by your depositary bank and published in the Federal Gazette (*Bundesanzeiger*) at the same time. However, we must exempt citizens of certain countries from these subscription offers due to local legal requirements under the securities laws of those countries. That is why we must also process the information about your nationality.

The legal basis for the processing of your personal data is Article 6(1)(c) GDPR in conjunction with Article 9(1)(c)(ii) SE-Regulation and Section 67e(1) AktG.

i) Statistical purposes

We process the data described under section 2 a), b) and e) in order to compile statistics on our shareholders and on shareholder development.

The legal basis for the processing of your personal data is Article 6(1)(f) GDPR. We have a legitimate interest in compiling statistics so that we can identify the composition of our company's shareholder structure. In addition, we minimise risks for those affected by this by anonymising personal data in the course of statistical processing so that conclusions about individual persons are made impossible.

j) Processing of your requests

We process the data described under section 2 d) in order to be able to process your request and answer your inquiries. The legal basis for this processing of your personal data is Article 6(1)(b) GDPR.

k) Prize draw

If you record your e-mail address in our InvestorPortal in order to participate in the prize draw, we process this in order to enable you to participate in the prize draw and to be able to contact you if you win. The legal basis for this processing is Art. 6(1)(b) GDPR.

l) Other purposes

If required by law, we will inform you in advance if we process your personal data for purposes other than those specified here.

4. Recipients and categories of recipients of personal data

We use various service providers for the processing of personal data.

As we issue registered shares, we are legally obliged to maintain a share register. We have commissioned Computershare Deutschland GmbH & Co KG, Elsenheimerstr. 61, 80687 Munich, Germany therewith.

The Vonovia InvestorPortal is operated by Computershare exclusively on our behalf and on our instructions. The operation of the media gallery within the Vonovia InvestorPortal, in which video/audio messages and written statements can be uploaded, is carried out exclusively on our behalf and on our

instructions by our service provider wige SOLUTIONS GmbH & Co. KG, Buschstraße 9,| 53340 Meckenheim.

As part of the preparation, conduct and follow-up of General Meetings, we also commission other service providers who receive personal data from data subjects (e.g. printing companies for sending General Meeting documents, security services for admission controls). Computershare and the other service providers only receive such personal data from us that is necessary for the performance of the commissioned service. Computershare and the other service providers 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. In connection with the preparation, conduct and follow-up of the General Meeting, we may also transfer your personal data to our legal advisors, tax advisors or auditors.

If you attend the General Meeting, we are obliged, pursuant to Section 129(1) sentence 2 AktG, to file you in the list of participants, stating your name, place of residence, number of shares and type of ownership. These data are visible to all other participants of the General Meeting during the meeting and to shareholders up to two years thereafter (Section 129(4) AktG).

If a shareholder requests that a matter be placed on the agenda, we will publish the relevant matter by disclosing the name of the shareholder if the requirements are met in accordance with the provisions of stock corporation law. Countermotions and election proposals from shareholders will also be made available on the company's website together with your name in accordance with the provisions of stock corporation law, if the requirements are met.

If you as a shareholder make use of the right to submit questions, your questions – together with your name – may be dealt with during the virtual General Meeting. Other participants of the General Meeting may take note of that.

If you make use of the option to submit written statements or audio/video messages and your written statements or audio/video message is published on the InvestorPortal or displayed during the virtual General Meeting together with your name, all properly registered shareholders, their authorised representatives and, if applicable, guest viewers may take note of your statement or your video/audio message and your name. Furthermore, to the extent that your contribution is displayed during a part of the General Meeting which is recorded and published on our website after the General Meeting, any internet user can take note of your contribution and your name.

Your data is generally being processed in countries belonging to the European Union. If persons from countries outside the European Union and the European Economic Area hold shares in our company, we will also send certain information to these shareholders (e.g. invitations to General Meetings). If personal data are also included in these notifications (e.g. motions to General Meetings with the name of the applicant being stated), this data will also be transferred to third countries. The provisions of the GDPR are not directly applicable in third countries. In the absence of an adequacy decision of the European Commission, these countries may provide a lower level of protection for your personal data. A transfer is nevertheless necessary in order to inform all shareholders equally, since we are not permitted to exempt shareholders from third countries from our duty to provide information. With the transmission we fulfil our contractual obligations. The legal basis for the transmission is Article 49(1)(b) GDPR.

5. Data sources

If you purchase shares, your personal data will not be collected by us, but by the depository banks involved in the share transaction. This is carried out via Clearstream Banking AG, Mergenthalerallee 61, 65760 Eschborn, which, as the central securities depository, is responsible for the technical settlement of securities transactions and the deposit of shares for credit institutions.

If you contact us and use our Vonovia InvestorPortal, we will receive the personal data directly from you. If you act as authorised representative of a shareholder, we receive your personal data from the shareholder who granted you the power of attorney and directly from you as far as your behaviour during the General Meeting is concerned.

If you attend the General Meeting as a guest or follow the virtual General Meeting, we will receive your data either directly from you, in particular if you yourself have applied for admission as a guest with us (e.g. as a representative of the media or authorities), from one of our shareholders who applies for your admission as a guest, or possibly in the course of our business activities from internal or external sources, some of which are also publicly accessible.

6. 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). If we become aware that a shareholder is no longer a shareholder of our Company, we shall store the shareholder's personal data for a maximum of twelve months, subject to other statutory provisions pursuant to Section 67e (2) AktG.

To the extent required by law or if the company has a legitimate interest in the storage of personal data, for example in the event of court or out-of-court disputes at the General Meeting or in order to be able to track the application and voting behaviour, a longer storage of personal data is possible. In these cases, however, we do not necessarily store personal data of all the categories listed under section 2, but only those data which are absolutely necessary for achieving the respective purposes - for example to prove voting behaviour.

The access data we collect in connection with the operation of the InvestorPortal is stored by us for a period of three months and then processed exclusively in anonymized form for statistical purposes. We delete all other data collected in connection with the operation and use of the InvestorPortal no later than one month after your account on the InvestorPortal has been deleted. Either you can delete the account yourself or your account will be deleted automatically if you are no longer a shareholder of Vonovia SE. Your data will only be stored further if this is required by law or if we have a legitimate interest in further storage, for example in the event of disputes in or out of court in connection with the operation of the InvestorPortal or in order to be able to track the application and voting behaviour. After the personal data are no longer needed for these purposes, they are anonymised or deleted.

7. Rights of data subjects

As a data subject, you can contact our data protection officer named in section 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, Article 15 GDPR)
- the right to obtain the rectification of inaccurate data or have incomplete data completed (right to rectification, Article 16 GDPR),
- the right to obtain the erasure of personal data without undue delay (right to erasure, Article 17 GDPR),
- the right to obtain restriction of processing personal data (right to restriction of processing, Article 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, Article 20 GDPR)

Where we process your personal data for the purposes of the legitimate interests pursued by Vonovia SE 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, Article 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, every shareholder, authorised representative and guest has the right to lodge a complaint with a competent supervisory authority pursuant to Article 77 GDPR.

8. Right of objection according to Section 67 AktG

According to Section 67(6) AktG you also have the right to object to the use of your data for advertising purposes.

Vonovia SE
The Management Board
