

Data Privacy Notice and Information on the right of withdrawal pursuant to Sec. 67 German Stock Corporation Act

for shareholders 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 on which personal data we are processing from you as our shareholder or your authorized 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.

b) Data controller

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

(c) Contact details of the Data Protection Officer

Ernst & Young Law GmbH
c/o Vonovia SE
post office box
44784 Bochum, Germany
Email: datenschutz@vonovia.de

2. Information concerning the processing

(a) Categories of data

Our shares are registered shares. Section 67 of the German Stock Corporation Act (*Aktiengesetz*, AktG) requires that such shares are registered at the company's share register (*Aktienregister*), including certain personal data. Without this information, you cannot be entered in the share register and you cannot exercise your rights as a shareholder, such as voting rights at our general meetings.

If you purchase Vonovia SE shares, e.g. as part of a share purchase via a depository bank or through a capitalisation issue (e.g. by a "scrip dividend"), if you participate in a general meeting as a shareholder or authorised representative or if we contact you, we – as the controller within the meaning of data protection laws – are processing the following of your personal data:

- name and surname,
- date of birth,
- address,
- class of shares,
- type of ownership of the share,
- number of shares, and
- ticket number.

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

In addition, we may also be processing information on motions, questions, election proposals and requests from shareholders at the annual general meeting as well as on voting behaviour if a power of attorney and instructions to the authorised representative have been issued or if a postal vote has been held.

(b) Purpose and legal basis of the processing operation

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

Maintaining the share register and fulfilling legal and supervisory obligations

We are processing the data described under a) in order to comply with our legal obligation to maintain the share register. In addition, we may be processing 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 processing is necessary to fulfil our obligations under stock corporation law pursuant to Section 67 of the German Stock Corporation Act (AktG). The legal basis for the processing of data is Article 6(1)(c) of the DSGVO.

Preparation, execution and follow-up of general meetings

We are processing the data described under a) in order to enable shareholders to participate in the general meetings (e.g. by checking their eligibility to participate) and to enable shareholders to exercise their rights at the general meeting (including granting and revoking powers of attorney and instructions via the shareholder portal on the Company's website at <http://investoren.vonovia.de/hv>).

The processing of the above personal data is absolutely necessary for the proper conduct of the general meeting. If you do not provide us with the necessary personal data, we will not be able to allow your attendance in the general meeting.

Processing is required for the fulfilment of our obligations under stock corporation law pursuant to Sections 118 and following of the German Stock Corporation Act (AktG). The legal basis for the processing is Article 6(1)(c) of the GDPR.

Investor Relations

We are processing the data described under a) in order to contact you so that we can send you information about our company that we consider to be of particular interest to investors.

The legal basis for the processing of your personal data is Art. 6(1)(f) of the GDPR. We have a legitimate interest in representing our company appropriately to our shareholders and in disclosing information about business incidents in order to enhance our corporate reputation.

Operation of the InvestorPortal

We are processing the data described under a) in order to be able to provide you the Vonovia InvestorPortal throughout the year. There you will have the opportunity to view your shareholder data as well as data on your share portfolio, to notify us of any changes of e-mail address and to register to upcoming annual general meetings or to appoint authorised representatives.

The legal basis for the processing of your personal data is Art. 6(1)(f) DSGVO. Our legitimate interest lies in our ambition to provide you with a free service to inspect and manage your shareholder and portfolio data and to conveniently register for our general meetings.

You can delete your account of the Vonovia InvestorPortal after the end of each annual general meeting.

Subscription offers for capital increases

We are processing the data described under 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 Art. 6(1)(f) DSGVO. Our legitimate interest lies in the fact that we must comply with the legal regulations of the respective countries.

Statistical purposes

We are processing the data described under a) in order to compile statistics on our shareholders and on shareholder development.

The legal basis for the processing of your personal data is Art. 6(1)(f) DSGVO. 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.

Other purposes

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

(c) Recipients and categories of recipients of personal data

We are using 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.

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 are processing 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 are processing personal data are obliged to treat this data confidentially.

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 both during the meeting and by shareholders up to two years thereafter (Section 129(4) AktG).

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 Art. 49(1)(b) GDPR.

3. 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 administrator, is responsible for the technical settlement of securities transactions and the deposit of shares for credit institutions.

If you contact us, we will receive the personal data directly from you.

4. Storage duration

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).

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 2. a), but only those data which are absolutely necessary for achieving the respective purposes - for example to prove voting behaviour.

After the personal data are no longer needed for these purposes, they are anonymised or deleted.

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 have 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)

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 the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

Regardless of this, every shareholder and legal representative has the right to lodge a complaint with a competent supervisory authority pursuant to Art. 77 GDPR.

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

Vonovia SE
The Board of Directors