



Data Privacy Notice for shareholders and authorized representatives of shareholders with regard to data processing for purposes of the virtual general meeting of Zalando SE

Protecting your personal data and processing it in compliance with the law is a matter of high priority for us. For this reason, we would like to inform you herewith about the processing of your personal data by Zalando SE (the **Company/ we**) with regard to the preparation, conduct and follow-up of the virtual general meeting and your rights under the data protection provisions set out in the General Data Protection Regulation (**GDPR**) and the German Federal Data Protection Act (*Bundesdatenschutzgesetz* - **BDSG**).

We will conduct the general meeting in 2025 as a virtual general meeting according to Section 118a German Stock Corporation Act (*Aktiengesetz* – **AktG**) in conjunction with Section 16a of the company's articles of association without the physical presence of the shareholders or their authorized representatives (with the exception of the proxies appointed by the Company). Shareholders and their authorized representatives 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 (**AGM Portal**). The AGM Portal is operated by our service provider Better Orange IR & HV AG, c/o Link Market Services GmbH, Landshuter Allee 10, 80637 Munich, Germany, exclusively on our behalf and according to our instructions. It can be accessed at the Internet:

<https://corporate.zalando.com/en/investor-relations/events/annual-general-meeting/annual-general-meeting-2025>.

1. Who is responsible for data processing?

Controller for the processing of your personal data is:

Zalando SE
Valeska-Gert-Strasse 5
10243 Berlin
Germany
Phone: + 49 (0)30 2000 88 400



Email: impressum@zalando.de

You can contact the Data Protection Officer of Zalando SE by regular mail or by email at the following address:

Zalando SE
Valeska-Gert-Strasse 5
10243 Berlin
Germany
Email: datenschutz@zalando.de

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

We process the following personal data with regard to the preparation, conduct and follow-up of the virtual general meeting:

- Personal data (e.g., first and surname, title (if applicable), surname at birth (if applicable), gender, nationality, email address, address, and other contact details (e.g., your shipping address);
- Shareholder data and information on your shareholding (number of shares, class of shares, type of ownership of shares and number of registration confirmation (AGM ticket), settlement bank);
- Type, date and form of your or of the authorized representative's vote;
- Name and address of your authorized representative, if applicable;
- Data related to statements in text form or as video message (depending on the type of contribution your video image and your voice as well as your name, if applicable);
- Login data for the AGM Portal of Zalando SE.

If you visit our AGM Portal on the internet, we collect data on your visit of our AGM Portal. The following data and device information is regularly recorded in the web server log files:

- retrieved or requested data;
- date and time of the retrieval;
- message whether the retrieval was successful;
- type of web browser and operating system used;
- IP address;



- AGM ticket number and session ID;
- login and password reset;
- acknowledgement and acceptance of the terms of use.

Your browser automatically transfers this data to us when you visit our AGM Portal.

To the extent that the personal data is not disclosed by you or by your authorized representative in the context of the registration process for the general meeting or collected directly from you in connection with your use of the AGM Portal, the personal data of the shareholders or the authorized representatives will be transmitted to us by the custodian bank or by a third party involved in the registration process.

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

We process your personal data in compliance with the provisions of the GDPR, the BDSG, the Regulation (EG) No. 2157/2001 of the Council from 8 October 2001 on the Statute for a European company (**SE Regulation**), the AktG, the German Telecommunication-Telemedia-Data-Protection Act (Telekommunikation-Digitale-Dienste-Datenschutz-Gesetz – **TDDDG**) as well as any other relevant legal provisions.

Via the AGM Portal, you may, amongst other things, follow the virtual general meeting in video and audio, exercise your voting rights, grant powers of attorney, as well as submit statements in text form or as video message or declare objections to the minutes of the notary. In order to use the AGM Portal, you will have to log in with your individual access data.

Preparation, conduct and follow-up of the virtual general meeting

Your personal data is processed to prepare, conduct and follow-up the virtual general meeting and to fulfil our legal obligations towards shareholders and their authorized representatives in this context, in particular to

- manage registration for and connection to the general meeting of shareholders, their authorized representatives (e.g., identity verification, checking the right of admission, creation of the list of attendees and holding for inspection, sending access data) and
- enable shareholders and their authorized representatives to exercise their



rights in connection with the general meeting (in particular the granting and revocation of powers of attorney and instructions and exercise of voting, proposal, statement, speaking and access 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).

The legal basis for the processing is Art. 6 (1) lit. c) GDPR in conjunction with Art. 9 (1) lit. c) ii) SE Regulation, Section 67e (1) AktG and our obligations under stock corporation law in accordance with Art. 53 of the SE Regulation in conjunction with Section 118 et seqq. AktG.

The processing of your personal data is necessary for the proper conduct of the virtual general meeting. If you do not provide us with the necessary personal data, we may not be able to connect you to the virtual general meeting.

In connection with the preparation, conduct and follow-up of the virtual general meeting, we may also transmit 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 Art. 6 (1) lit. f) GDPR.

Compliance with statutory reporting and publication obligations (in particular voting rights notifications) and other statutory obligations, in particular retention obligations

In addition, we process data disclosed to us by you or other parties subject to notification obligations (notifying persons) as part of voting rights notifications under the German Securities Trading Act (*Wertpapierhandelsgesetz*). The relevant statutory provisions and Art. 6 (1) lit. c) GDPR serve as the legal basis for this processing.

In addition, your personal data may also be processed for meeting further legal obligations such as regulatory requirements as well as retention obligations under stock corporation law, commercial law and tax law. The relevant legal basis in these cases is again Art. 6 (1) lit. c) GDPR in conjunction with the relevant statutory provisions.

In certain cases, we process your data to comply with securities regulations in



non-European countries. This applies in particular if, in the case of capital increases, we have to exclude specific shareholders or groups of shareholders from the provision of information about subscription offers due to their nationality or place of residence. The legal basis for the processing of your personal data is Art. 6 (1) lit. f) GDPR.

Further processing purposes

We are furthermore entitled to process your data for safeguarding our legitimate interests or the legitimate interests of a third party in accordance with Art. 6 (1) lit. f) GDPR. This is the case, for example, when we prepare analyses and statistics (e.g., for illustrations of the shareholder structure and development, of trading volumes or to create an overview of our major shareholders). Furthermore, we have a legitimate interest to prevent or disclose illegal activities, fraud or similar threats in order to protect ourselves against any damage. If necessary, we will also process your data in order to establish and exercise legal claims, and to defend ourselves against legal claims.

If we intend to process your personal data for any purpose other than those mentioned above, we will inform you of any such intention in advance in compliance with the statutory provisions and obtain your consent, if required.

Cookies

For our AGM Portal we use technically necessary cookies, described below.

Cookie Name	Company	Purpose	Duration
JSESSIONID	Better Orange	Required to store the information whether SSL is active.	Session
JSESSIONID	Better Orange	Required to reset the session.	Session

Cookies are small files that are stored on your desktop, notebook or mobile device by a website that you visit. From this we can recognise, for example, whether there has already been a connection between your device and our AGM Portal. Cookies can also contain personal data. You can set your browser so that you are informed about the setting of cookies and allow cookies only in individual cases, exclude the acceptance of cookies for specific cases or in general and activate the automatic deletion of cookies when closing the browser. If you decide against the use of cookies, it is possible that not all functions of



our AGM Portal will be available to you or that individual functions will only be available to a limited extent.

The necessary session cookies we use are only used for the purpose of providing the AGM Portal and for the registration and identification of shareholders, authorized representatives. They are necessary for the functions of the AGM Portal and are deleted when you close your browser.

The setting of and access to the data stored in necessary cookies is based on Section 25 (2) No. 2 TDDDG. Any further processing of personal data associated with these cookies is necessary to safeguard our legitimate interest in enabling our shareholders and authorized representatives to visit our AGM Portal. The legal basis for this processing is Art. 6 (1) lit. f) GDPR.

If, in providing the AGM Portal, we wish to use cookies that are not necessary for the operation of the AGM Portal, such as functional or performance cookies, we will only do so if you have given your consent to this extent.

Use of artificial intelligence

In order to answer the questions of our shareholders and their authorized representatives, we also use an application featuring artificial intelligence. The spoken contributions of the shareholders and their authorized representatives are recorded by the AI application of one of our service providers (ACS Solution AG) and transcribed into text (**transcribed data**). The AI application can filter out the questions of the shareholders and their authorized representatives and display them accordingly in an Q&A tool. The transcribed data may contain personal data of the shareholders and their authorized representatives if these are included in the spoken contributions (e.g., name and other personal data transmitted in the course of the spoken contribution). The transcribed data will only be used to provide the service described here and not to train the AI application.

The use of this AI application serves to efficiently support compliance with our requirements under stock corporation law, such as fulfilling the right to information under stock corporation law. The legal basis is the protection of overriding legitimate interests in accordance with Art. 6 (1) lit. f) GDPR.

No automated decision-making takes place in connection with the use of the AI application for the purposes described here. All answers are reviewed by our



staff before use.

4. With which recipients do we share your data?

For managing our general meeting, we make use of external service providers, e.g., service providers for the organization of the general meeting, for printing and sending invitations to the general meeting and notifications to shareholders as well as for conducting the general meeting. However, the service providers commissioned by us receive only such personal data that is required for the provision of the service requested and they process the data exclusively on behalf and on our instructions. 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.

In connection with conducting the general meeting, your personal data may, under certain circumstances, be disclosed to other duly registered shareholders or their authorized representatives (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 AGM Portal, stating your name, or by other contributions that you make in the preparation for or during the virtual general meeting via the communication channels described in the invitation to the general meeting).

Finally, we may be required to disclose your personal data to further recipients, for example, when publishing voting rights notifications in accordance with the provisions of the German Securities Trading Act, or to authorities in order to comply with statutory notification requirements (e.g., to tax authorities or prosecuting authorities).

Your data is generally processed in the European Union. In case individuals from countries outside of the European Union or the European Economic Area (**Third Countries**) hold shares of the Company, we will also provide information to these shareholders (e.g., invitation to the virtual general meeting). Insofar as personal data is included in these communications (e.g., requests to the virtual general meeting with disclosure of names), the personal data is transferred in Third Countries. The GDPR is not directly applicable in Third Countries. In Third Countries that have not been subject to an adequacy decision by the European Commission, the level of data protection for your personal data might be lower.



However, a transfer of data is necessary to inform all shareholders equally, since shareholders of Third Countries are not excluded from our obligation to provide adequate information to data subjects. With this data transfer, we comply with our contractual obligations. The legal basis for this processing is Art. 49 (1) lit. b) GDPR.

5. How long do we store your data?

We will delete or anonymize your personal data in the AGM Portal once it is no longer needed for the aforementioned purposes and to the extent that we are no longer required to continue storing such data in compliance with statutory obligations of documentation or retention (e.g., under the German Stock Corporation Act, the German Commercial Code, the German Fiscal Code or other legal provisions).

In addition, we also retain personal data if required in relation to claims asserted by or against our Company or for safeguarding our aforementioned legitimate interests.

If you have specific questions concerning the storage period, please contact our Data Protection Officer.

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

If the legal requirements are met, shareholders and their authorized representatives as data subjects have – with regard to their personal data – the right:

- to obtain information on data processing and a copy of the processed data (right of access, Art. 15 GDPR),
- demand the rectification of inaccurate data or the completion of incomplete data (right to rectification, Art. 16 GDPR),
- demand the erasure of personal data without undue delay (right to erasure, Art. 17 GDPR),
- to demand the restriction of processing (right to restriction of processing, Art. 18 GDPR),
- as well as to receive personal data concerning them, which they have provided to a controller in a structured, commonly used and machine-readable format, and also to transmit these data to another



controller without hindrance from the controller to which the personal data have been provided (right to data portability, Art. 20 GDPR).

Right to object to the processing of data for purposes of legitimate interests

Where we process your data for the purposes of the legitimate interests pursued by Zalando SE or a third party, you have the right to object to this processing on grounds relating to your particular situation. In this case, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or if the processing serves the purpose of establishing, exercising or defending legal claims.

You can assert the aforementioned rights by contacting our Data Protection Officer at the address specified under no. 1 above. Please note that there may be statutory exceptions (e.g., continuing retention obligations) that may limit the exercise of your rights.

Irrespective thereof, you also have the right to lodge a complaint with a competent data protection supervisory authority (Art. 77 GDPR). The contact data of all competent supervisory authorities can be found via the following link: https://www.bfdi.bund.de/DE/Infothek/Anschriften_Links/anschriften_links-node.html

7. Do you have any questions regarding the handling of your data?

If you have any questions regarding the processing of your personal data, you can contact our Data Protection Officer using the contact details listed at no. 1 above to clarify the facts directly with us.

The information in this document was updated in April 2025

In case of any relevant changes, we will provide an update of this information on our website

<https://corporate.zalando.com/en/investor-relations/events/annual-general-meeting/annual-general-meeting-2025>.