



## 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 2026 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 Computershare Deutschland GmbH & Co. KG, 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-2026>.

### 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: [datenschutz@zalando.de](mailto:datenschutz@zalando.de)

You can contact the Data Protection Officer of Zalando SE by regular mail or by email at the following address, marked 'For the attention of the Data Protection Officer':

Zalando SE

Valeska-Gert-Strasse 5

10243 Berlin

Germany

Email: [datenschutz@zalando.de](mailto: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 your authorized representative's vote;
- Name and address of your authorized representative, if applicable;
- Data related to your statements in text form;
- 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 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 access 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 data 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 Sections 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 data 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 in conjunction with 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, i.e. our legitimate interest in complying with securities regulations in non-European countries.

### **Further processing purposes**

We may further 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 and of trading volumes, or to create an overview of our major shareholders). Furthermore, we have a legitimate interest to prevent or detect illegal activities, fraud or similar threats in order to protect ourselves against any damage. If necessary in individual cases, 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 as described below.

<b>Cookie name</b>	<b>Company</b>	<b>Purpose</b>	<b>Duration</b>
Computershare	Netscaler 14.1	Technically necessary cookie to ensure a stable connection between the AGM Portal and the server	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 technically 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 technically necessary cookies is based on Section 25 (2) No. 2 TDDDGD as legal basis.

If, in providing the AGM Portal, we wish to use cookies that are not technically 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. The legal basis for data processing in this case is Art. 6 (1) lit. a) GDPR.

### **Use of artificial intelligence**

In order to answer the questions of our shareholders and their authorized representatives, we use, inter alia, 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 (Computershare Deutschland GmbH & Co. KG) 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 legal obligations under stock corporation law, such as fulfilling the right to information under stock corporation law. The legal basis for data processing is the protection of our 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 spoken contributions are reviewed by our staff.

### **Note on Eye-Able**

Eye-Able® Assist is a software developed by Web Inclusion GmbH to provide barrier-free access to information on the internet for everyone. Eye-Able® Assist is used in the AGM Portal. The files required to use Eye-Able® Assist, such as JavaScript, stylesheets and images, are loaded locally from the website of the AGM Portal. When functions are activated, Eye-Able® Assist uses the browser's local storage to save settings. All settings are stored locally only and are not transmitted further. Further information on Eye-Able® can be found at: <https://eye-able.com/privacy-policy-eye-able>

## **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 upon 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 that state 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., submissions for the virtual general meeting with disclosure of names), the personal data is transferred to 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 in Third Countries are not excluded from our obligation to provide legally required information to shareholders. 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 legitimate interests as described above.

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 in an individual cases, 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),
- to demand the rectification of inaccurate data or the completion of incomplete data (right to rectification, Art. 16 GDPR),
- to 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 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).

As far as we process personal data for the legitimate interests pursued by Zalando SE or a third party, you are not legally obliged to provide us with your data, and you can access the general meeting without providing your personal data.

### **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.

If we process your data based on your consent, you can withdraw your consent at any time. This does not affect the lawfulness of the processing based on your consent before the withdrawal.

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 competent supervisory authorities can be found via the following link: [https://www.bfdi.bund.de/DE/Infothek/Anschriften\\_Links/anschriften\\_links-node.html](https://www.bfdi.bund.de/DE/Infothek/Anschriften_Links/anschriften_links-node.html)

## **7. Do you have any questions regarding the processing 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 March 2026.

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-2026>.

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