

APPENDIX 1

Data protection information for shareholders and shareholder representatives of LEG Immobilien SE

On 25 May 2018, Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data, on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation, "GDPR") and new German data protection regulations entered into force. Among other things, the GDPR provides for information obligations in connection with the collection of personal data (transparency of data processing).

We take data protection for our shareholders very seriously and would like to use the following information to inform you about the processing of your personal data by LEG Immobilien SE (the "Company") and the rights to which you are entitled under data protection law.

1. Who is responsible for data processing?

LEG Immobilien SE
Flughafenstraße 99
40474 Düsseldorf
Phone 02 11/45 68-0
Fax 02 11/45 68-261
E-mail info@leg-wohnen.de

The central point of contact for data protection matters is the LEG Group's Data Protection Management, Flughafenstraße 99, 40474 Düsseldorf, e-mail privacy@leg-wohnen.de.

The contact person for personal data protection matters and for the supervisory authorities is the LEG Group's Data Protection Officer, Flughafenstraße 99, 40474 Düsseldorf, Germany, telephone +49 (0)211/74 07 40-77, e-mail datenschutz@leg-wohnen.de.

2. What categories of data are processed?

In connection with the handling of general meetings, the Company processes personal data (in particular name, address and other contact data of the shareholder, number of shares, type of share ownership, access data for the access-protected AGM portal, if applicable name and address of the shareholder representative authorised by the respective shareholder) on the basis of the applicable data protection provisions. In addition to personal data of the shareholders stored in the Company's share register, the Company processes data provided by the shareholders in the context of the registration for the Annual General Meeting or transmitted to the Company by the custodian banks for the shareholders on this occasion (in particular powers of attorney, instructions, votes by postal ballot or objections to the minutes of the Annual General Meeting).

When you visit our AGM portal on the Internet, we collect data about accesses to our AGM portal. The following data and device information are logged in the web server log files:

- o Retrieved or requested data;

- o Date and time of retrieval;
- o Message whether the retrieval was successful;
- o Type of web browser and operating system used;
- o Referrer URL (the previously visited page);
- o IP address;
- o Shareholder number and session ID;
- o and login.

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

3. For what purposes and on what legal basis is your data processed? From whom does the company receive which data?

We process your personal data in compliance with the GDPR, the German Federal Data Protection Act (BDSG), the German Stock Corporation Act (AktG) and all other relevant legal provisions.

The shares of the Company are registered shares. Sec. of the German Stock Corporation Act (AktG) stipulates that registered shares must be entered in the company's share register, stating the name, date of birth, address of the shareholder and the number of shares or share number. The shareholder is generally obliged to inform the company of this information. As a rule, the credit institutions involved in the acquisition or custody of your registered shares in the Company will forward the information relevant for the maintenance of the share register (in addition, e.g. also nationality, gender and submitting bank) to the share register on your behalf. This is done via Clearstream Banking AG, Frankfurt, which, as central securities depository, carries out the technical processing of securities transactions and the safekeeping of shares for the credit institutions. If your shares are sold, we are also informed of this via Clearstream Banking AG, Frankfurt.

The Company uses your personal data for the purposes provided for in the German Stock Corporation Act. These are, in particular, the maintenance of the share register, communication with the custodian banks and shareholders as well as various processes in connection with the holding of general meetings (e.g. transmission of access data and information for the general meeting, identification of shareholders for the processing of enquiries, registration for the general meeting, documentation of the right to participate and preparation of the list of participants, if applicable).

Sec. 67 para. 6 sentence 4 AktG stipulates that the data entered in the share register may only be used for advertising the company if the shareholder does not object. Shareholders must be informed of their right to object in an appropriate manner (sec. 67 para. 6 sentence 5 AktG). The company fulfils this obligation, among other things, by means of the objection instruction contained in this information in section 8. In the event that the data entered in the share register is used for advertising the company, the processing is based on Art. 6 para. 1 lit. f) GDPR.

In addition, we may use your data for purposes compatible with these purposes (in particular to



compile statistics, e.g. for the presentation of shareholder development, number of transactions, or overviews of the largest shareholders). In addition, we also process your personal data to comply with other legal obligations, e.g. regulatory requirements as well as stock corporation, commercial and tax law retention obligations.

The legal basis for the processing of your personal data by the Company is the German Stock Corporation Act (Aktiengesetz) in conjunction with Art. 6 para. 1 lit. c) GDPR. In this respect, the GDPR expressly provides that processing of personal data is also justified on the basis of specific legal obligations (outside the GDPR).

In individual cases, the Company may also process your data to protect the legitimate interests of the Company or a third party pursuant to Art. 6 (1) f) GDPR. Among other things, a legitimate interest of the Company exists if, for example, in the case of capital increases, we have to exclude individual shareholders or groups of shareholders from the information on subscription offers due to their nationality or place of residence in order not to violate legal provisions of certain countries. For the right to object to the processing of data to protect legitimate interests, see section 8 below.

In connection with the conduct of general meetings, the Company processes personal data as described above on the basis of the applicable data protection provisions.

The processing of personal data in connection with general meetings is carried out for the purpose of processing the registration and participation of shareholders in the general meeting (e.g. verification of the right to participate) and to enable shareholders to exercise their rights in the context of the general meeting (including registration as well as granting and revocation of proxies).

When authorising the proxies appointed by the Company for the Annual General Meeting, the declaration of proxy must be recorded by the Company in a verifiable manner and kept for three years in a manner protected against access (sec. 134 para. 3 sentence 5 AktG).

We have a legitimate interest in ensuring the orderly conduct of the Annual General Meeting. If, in accordance with the specifications in the notice of the Annual General Meeting, you submit countermotions to the proposed resolutions prior to the Annual General Meeting or declare objections to resolutions of the Annual General Meeting at the Annual General Meeting, we therefore process the name and address of the shareholder and the shareholder number as well as your e-mail address - if provided - for the purpose of processing them. If you authorise a third party to attend the Annual General Meeting, we also process the name and address of the authorised representative. The legal basis for the processing in these cases is also the respective statutory provisions in conjunction with Art. 6 para. 1 lit. c) GDPR.



Should we wish to process your personal data for a purpose not previously mentioned, we will inform you of this beforehand within the framework of the legal provisions.

4. Will your data be transferred to a third country?

In order to comply with the above purposes, it may be necessary for your personal data to be transferred outside the European Economic Area (EEA) for one of the above purposes. If we transfer personal data to service providers or group companies outside the EEA, the transfer will only take place if the third country has been confirmed by the EU Commission as having an adequate level of data protection or if other appropriate data protection guarantees (e.g. binding internal company data protection regulations or EU standard contractual clauses) are in place.

5. To which categories of recipients do we pass on your data, if any?

External service providers:

For the administration and technical management of the share register as well as for the conduct of the general meetings, we partly use external service providers with whom we have concluded contracts for processing on behalf pursuant to Art. 28 GDPR (e.g. share registrar, IT service provider, AGM service provider, service provider for the printing and dispatch of shareholder notices and legal advisor). Commissioned service providers only receive personal data from the Company that is necessary for the performance of the commissioned service and process this data exclusively in accordance with the instructions of the Company.

Other recipients and joint data protection controllers:

If you participate in the Annual General Meeting, we are obliged under sec. 129 para. 1 sentence 2 AktG to enter your name, place of residence and the number of shares represented in the list of participants. This data may be inspected by other shareholders and participants in the Annual General Meeting during the meeting and by shareholders for up to two years thereafter (sec. 129 para. 4 AktG). In addition, personal data may be made publicly available in the context of an announcement of shareholder requests for additions to the agenda as well as counter motions and election proposals by shareholders.

If a shareholder requests that items be added to the agenda (sec. 122 para. 2 AktG), the company will announce these items if the relevant requirements are met, stating the name of the shareholder in accordance with the provisions of stock corporation law. Likewise, the company will publish counter motions and election proposals from shareholders on the internet, stating the name of the shareholder, if the relevant requirements are met in accordance with the provisions of stock corporation law (sec. 126 para. 1, 127 AktG). In addition, we may be obliged to transmit your personal data to further recipients, such as authorities for the fulfilment of statutory notification obligations (e.g. in the case of voting rights notifications).

LEG Management GmbH, Flughafenstr. 99, 40474 Düsseldorf, Germany, provides services to LEG Immobilien SE in connection with the implementation and handling of the Annual General Meeting,



in particular with regard to the fulfilment of legal requirements under the German Stock Corporation Act (AktG). To the extent that personal data is transferred to LEG Management GmbH in this context, the companies are jointly responsible for data protection within the meaning of Art. 26 GDPR. Data subjects may assert their rights against each of the data controllers.

6. How long will your data be stored?

As a matter of principle, we anonymise or delete your personal data as soon as and insofar as it is no longer required for the purposes stated herein, unless legal obligations to provide proof and/or to retain data (in accordance with the German Stock Corporation Act, the German Commercial Code, the German Fiscal Code or other legal provisions) oblige us to continue to store it. For data collected in connection with general meetings, the storage period is regularly up to three years.

The data stored in the share register must regularly be retained by us for ten years after the sale of the shares for reasons of commercial and tax law. Beyond this, we only retain personal data in individual cases if this is necessary in connection with claims asserted against our company (statutory limitation periods of up to thirty years).

7. Cookies

When using the AGM portal, only technically necessary cookies are used. These cookies enable the use of the website and are absolutely necessary for the use of its functions. This means, for example, the storage of log-in data or the language selection through so-called session cookies (which are deleted when the browser is closed).

Cookies used

Cookie	Description	Storage period	Classification
PHPSessionID	Standard session identification for PHP	Deletion with closing the browser	Necessary
cookieaccepted	Cookie to store consent to the cookie bar function and thus hide it in the view.	10 days	Necessary

You can refuse the storage of cookies by websites and applications on your end devices or adjust your browser settings. The deactivation of technically necessary cookies will result in restrictions in the use of the website.

Browser settings

They can refuse the storage of cookies by websites and applications on their end devices or adjust their browser settings. In the latter case, users will receive a warning before cookies are stored. Users can also adjust their settings so that their browser either rejects all cookies or only third-party cookies. Users can also delete cookies that have been stored previously. It should be noted that the settings must be adjusted separately for each browser and on each device used. In the event that users do not wish to use cookies, we would like to point out that, to our regret, we cannot guarantee that our pages will function properly without the use of cookies. Without the use of cookies, some functions of the websites and applications may not be available or certain pages may not be displayed. Users can click on one of the following links to go directly to the manual of the browser used or, if necessary, to the help function of the browser used.

- o [Google Chrome](#)
- o [Mozilla Firefox](#)
- o [Apple Safari](#)
- o [Internet Explorer](#)
- o [Microsoft Edge](#)

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

You can request information about the data stored about you, correction of your personal data, deletion of your personal data and restriction of the processing of your personal data free of charge



at the address of the data protection officer mentioned in section 1. You also have the right to data portability. A request for deletion may be precluded by the Company's legal obligations to retain data.

a. **Art. 15 GDPR: The data subject's right to information**

You have the right to obtain information from us about what data we process about you.

b. **Art. 16 GDPR: Right to rectification**

If the data concerning you is incorrect or incomplete, you may request that incorrect information be corrected or that incomplete information be completed.

c. **Art. 17 GDPR: Right to deletion**

Under the conditions of Art. 17 GDPR, you can request the deletion of your personal data. Your right to erasure depends, among other things, on whether the data concerning you is still needed by us to fulfil our legal or contractual tasks.

d. **Art. 18 GDPR: Right to restriction of processing**

Under the conditions of Art. 18 of the GDPR, you may request the restriction of the processing of personal data concerning you.

e. **Art. 21 GDPR: Right to object**

You have the right to object to the processing of your data in order to protect the legitimate interests of the Company or a third party by contacting the LEG Group's Data Protection Officer, Flughafenstraße 99, 40474 Düsseldorf, tel. +49 (0)211/74 07 40-77, e-mail datenschutz@leg-wohnen.de.

If grounds arise from your particular situation that conflict with this data processing, we will stop this processing if we cannot demonstrate that there are compelling legitimate grounds for the processing that override the interests, rights and freedoms of the data subjects, or that the processing is for the establishment, exercise or defence of legal claims.

f. **Art. 7 para. 3 GDPR: Right to revoke consent**

You have the right to revoke consent given for the processing of your personal data at any time. The revocation of consent does not affect the lawfulness of the processing carried out on the basis of the consent until the revocation.

Do you have any complaints regarding the handling of your data?

If you have a complaint regarding the processing of your personal data, you may contact the Company's Data Protection Officer using the contact details provided at the beginning of this document in order to seek clarification with the Company directly. Independently of this, you have the right to lodge a complaint with a competent data protection supervisory authority. The data protection supervisory authority responsible for the Company is:

Landesbeauftragte für Datenschutz und Informationsfreiheit Nordrhein-Westfalen, Postfach 20 04 44, 40102 Düsseldorf, telephone +49.211.384240, e-mail poststelle@ldi.nrw.de.

Status of the information in this document: April 2023.

In the event of relevant changes, we will update this information and make it available on our website.

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In addition, we will check whether there is an obligation to provide other notification in individual cases in the event of any changes to this data protection information and, if applicable, comply with this existing notification obligation accordingly.