

# WESTWING

## DATA PROTECTION INFORMATION FOR SHAREHOLDERS AND PROXIES OF THE ANNUAL GENERAL MEETING OF WESTWING GROUP SE

Westwing Group SE (“**WESTWING**” or “**we**”) will hold the Annual General Meeting in 2022 as a virtual Annual General Meeting, without the physical presence of the shareholders and/or their proxies. In connection with the preparation, implementation and follow-up of this virtual Annual General Meeting, personal data of the shareholders and/or their proxies will be processed in accordance with Regulation (EU) 2016/679 (General Data Protection Regulation; “**GDPR**”) and the German Federal Data Protection Act (in German: BDSG).

### I. CONTROLLER

The controller of this data processing is WESTWING Group SE, Moosacher Straße 88, 80809 Munich, Germany, e-mail: [datenschutz@westwing.de](mailto:datenschutz@westwing.de).

### II. DATA PROTECTION OFFICER

The external data protection officer is Mr. Christian Volkmer, Projekt 29 GmbH & Co. KG, Ostengasse 14, 93047 Regensburg, e-mail: [anfragen@projekt29.de](mailto:anfragen@projekt29.de).

### III. PROCESSING OF PERSONAL DATA

Shareholders and their proxies can follow the entire virtual Annual General Meeting of WESTWING by video and audio transmission via an access-protected electronic system (“**AGM portal**”). For this virtual participation and the exercise of voting rights at the Annual General Meeting, shareholders and/or their proxies must register and provide proof of their entitlement to participate in the Annual General Meeting and exercise their voting rights.

We process the following personal data of the shareholders and, if applicable, (in part) of their proxies in connection with the registration and participation in the Annual General Meeting as well as the provision of the relevant proof of entitlement: personal data provided to WESTWING, such as first name, surname, title (e.g. Mr., Mrs.), title (e.g. Dr.), type of person (natural person or legal entity), address (consisting of country, city, postal code, street, house number), possibly different shipping address (with the same components as the residential address), e-mail address, depository bank, number of shares, class of shares and type of ownership of the share, if applicable. (with the same components as the residential address), e-mail address if applicable, custodian bank, number of shares, class of shares and type of share ownership, access data for the AGM portal and other data provided for registration for the virtual AGM or automatically processed in the course of participation (such as cell phone number, data retrieved or requested, date and time of retrieval, notification of the success of a retrieval, information on the web browsers used, URL data, IP address, access and session data).

In this context, the personal data of shareholders and/or their proxies also includes information on their voting behavior, on the granting or revocation of powers of attorney and instructions, on the declaration of objections to resolutions of the Annual General Meeting, and on motions, questions, election proposals and other requests submitted by shareholders and/or their proxies in relation to the virtual Annual General Meeting (“**personal data**”).

We and our service providers receive personal data from shareholders and/or their proxies personally, in some cases also automatically from their web browsers when using the AGM portal, or from their custodian banks. We receive personal data of the proxies from the shareholder who issued the proxy

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as well as directly from the proxies insofar as their behavior in the virtual shareholders' meeting is concerned. Shareholders and/or proxies are not legally or contractually obliged to provide their personal data; however, the provision of their personal data is required for participation in the Annual General Meeting and the exercise of their rights in the context of the Annual General Meeting.

## IV. COOKIES

We use cookies on our website. Cookies are small text files that are transferred from an Internet server to your browser and stored on its hard drive. Depending on your choice of cookies, the next time you visit the website with the same terminal device, the information stored in the cookies will be sent to our website or to another website to which the cookie belongs. This helps us to optimally design and display our website according to the preferences of the users. Under the "Cookie settings" button, website users can determine at any time which cookies they wish to allow. The cookies that are absolutely necessary enable basic functions and are required for the website to function properly.

## V. PURPOSES AND LEGAL BASIS OF THE PROCESSING

We process personal data exclusively to enable shareholders and/or proxies to participate in the Annual General Meeting and exercise their rights as shareholders in the context of the Annual General Meeting. The legal basis for the processing of the personal data is in this respect Art. 6 para. 1 sentence 1 lit. c GDPR in conjunction with. §§ Sections 118 et seq. German Stock Corporation Act (in German: AktG) and other provisions of the German Stock Corporation Act as well as Section 1 (2) of the Act on Measures in Corporate, Cooperative, Association, Foundation and Condominium Law to Combat the Effects of the COVID 19 Pandemic (Covid 19 Act). Furthermore, data processing also takes place in connection with notifications of voting rights in accordance with the German Securities Trading Act (in German: WpHG), for the fulfillment of other legal obligations, e.g. stock corporation, commercial or tax law retention obligations (cf. Art. 6 para. 1 sentence 1 lit. c GDPR in conjunction with the respective legal regulations).

In individual cases, we also process the personal data to protect our legitimate interests pursuant to Art. 6 (1) sentence 1 lit. f GDPR. This is particularly the case if processing of the personal data is necessary for compliance with non-European legal requirements (e.g. in the case of capital increases) or for the organization of the Annual General Meeting, as well as participation of shareholders and/or their proxies (e.g. for statistical purposes or to respond to inquiries). In addition, other shareholders of WESTWING and shareholder representatives may view the data recorded on the relevant, participating person in the list of participants, as the names of participants are published on our website at <https://ir.westwing.com/hv> when a request is made to add items to the agenda or counter motions, election proposals, questions or comments relating to the agenda are submitted. This data processing is necessary to align the course of the virtual shareholders' meeting with that of a physical shareholders' meeting and to inform the other participants in the virtual shareholders' meeting of the identity of a questioner.

Under certain circumstances, the processing of certain personal data may also be based on the consent of the data subject pursuant to Art. 6 (1) p. 1 lit. a GDPR.

## VI. RECIPIENTS OF PERSONAL DATA

The AGM portal is operated exclusively on our behalf and in accordance with our instructions by our service provider, Link Market Services GmbH, Landshuter Allee 10, 80637 Munich, and can be accessed at the Internet address <https://ir.westwing.com/hv> in the Investor Relations section under the heading Annual General Meeting 2022.

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WESTWING will also disclose the personal data to service providers for the purposes described above. The service providers belong to the following categories: IT services, taxes, logistics, printing services.

Furthermore, the personal data may be transferred to other recipients insofar as this is necessary for the fulfillment of legal obligations, e.g. to authorities, or insofar as a relevant consent to the data transfer has been given by the data subject.

## VII. DATA PROCESSING IN THIRD COUNTRIES

In principle, we only process personal data in the European Union. Personal data is only processed outside the European Union if a so-called “adequacy decision” of the European Commission exists for the country in question, or if suitable guarantees exist (cf. Art. 45f. GDPR).

## VIII. DELETION OF PERSONAL DATA

We store personal data for as long as this is necessary for the purposes described above and to comply with legal, in particular commercial, stock corporation and tax law retention periods.

## IX. RIGHTS OF THE DATA SUBJECTS

In accordance with the statutory provisions on data protection, the shareholders and/or proxies concerned have the right with regard to their personal data at any time:

- request information about the data we process and a copy of this data (right of access);
- to request the correction of inaccurate data and, taking into account the purposes of the processing, the completion of incomplete data (right to rectification);
- to request the deletion of the data if there are legitimate grounds for doing so (right to erasure);
- to request the restriction of the processing of the data, provided that the legal requirements are met (right to restriction of processing);
- if the legal requirements are met, to receive the data provided in a structured, common and machine-readable format and to transfer this data to another controller or, insofar as this is technically feasible, to have it transferred by WESTWING (right to data portability);
- not to be subject to a decision based solely on automated processing, unless the legal requirements for this are met. Automated decision-making is currently not carried out by WESTWING.

**Insofar as the processing of personal data is based on our legitimate interest pursuant to Art. 6 (1) p. 1 lit. f GDPR, data subjects have the right to object to the processing of their personal data for reasons arising from their particular situation by sending an email to: [datenschutz@westwing.de](mailto:datenschutz@westwing.de). We will then no longer process the personal data for these purposes, unless our legitimate interest in the individual case prevails.**

**Insofar as the processing of personal data should have taken place on the basis of consent pursuant to Art. 6 para. 1 p. 1 lit. a GDPR, the data subjects have the right to revoke their consent at any time with effect for the future by sending an e-mail to [datenschutz@westwing.de](mailto:datenschutz@westwing.de).**

The data subjects also have the right to lodge a complaint with the competent data protection authority. For the assertion of these rights as well as other inquiries and ambiguities regarding the processing of personal data, the data subjects have the option of contacting us by e-mail at: [datenschutz@westwing.de](mailto:datenschutz@westwing.de).