

Data privacy information
for shareholders and their proxies
regarding the Annual General Meeting 2025
of
Nemetschek SE
Munich

WKN: 645290
ISIN: DE0006452907

Nemetschek SE processes personal data of shareholders and their proxies in connection with the annual general meeting.

Below you will find information on the person responsible for data processing and the data protection officer (I.). You will also find information below on the processing of personal data (II.) and the rights of data subjects in relation to processing (III.).

I. Person responsible for data processing and data protection officer

1. Person responsible for data processing

NEMETSCHEK SE
Konrad-Zuse-Platz 1
81829 Munich
Phone: +49 89 540459-0
E-mail:

The company is represented by the members of its Management Board, Yves Padrines, Louise Öfverström and Usman Shuja.

2. Data Protection Officer

intersoft consulting services AG
Mrs. Jana Budde
Bernhard-Wicki-Strasse 7
80636 Munich
Phone: +49 89 544 446 48
E-mail: datenschutz@nemetschek.com

II. Processing of personal data

1. Personal data and its sources

Nemetschek SE processes the following personal data of shareholders and their proxies in connection with the annual general meeting in order to enable them to exercise their shareholder rights in relation to the annual general meeting:

- Surname and first name, address, e-mail address,
- Number of shares, class of shares, type of ownership of the shares,
- Unique identifier assigned to the shareholder by the last intermediary, number of the shareholder's securities account,
- Number of the admission ticket,
- voting at the Annual General Meeting,
- the content of the questions raised by the shareholder and the content of their answers as well as speeches and any objections raised to resolutions of the Annual General Meeting, as well as the content of any requests for additions, motions and election proposals; and
- if applicable, the surname, first name and address of the person authorized by the respective shareholder, the granting of power of attorney including any instructions given to him and his unique identifier issued by the last intermediary.

Insofar as this personal data was not provided by the shareholders when registering for the annual general meeting or is collected during the annual general meeting, the bank holding their securities account or the respective last intermediary within the meaning of Section 67c (3) of the German Stock Corporation Act ("AktG") will transmit their personal data to Nemetschek SE.

2. Purpose of processing and legal basis

Nemetschek SE processes the personal data of shareholders and their proxies to the extent necessary to process the exercise of shareholders' rights in connection with the annual general meeting. The legal basis for this processing is Art. 6 para. 1 subpara. 1 lit. c) General Data Protection Regulation ("GDPR") (fulfillment of legal obligations) in conjunction with § 67e para. 1 AktG.

Nemetschek SE also stores personal data of shareholders and their proxies to the extent necessary to fulfill statutory retention obligations. The legal basis for this processing is Art. 6 para. 1 subpara. 1 lit. c) GDPR (fulfillment of legal obligations) in connection with the respective retention obligations, in particular under capital market, stock corporation, commercial and tax law.

In addition, Nemetschek SE may continue to store personal data of shareholders and their proxies if this is necessary for the assertion, exercise or defense of legal claims. The legal basis for this processing is Art. 6 para. 1 subpara. 1 lit. f) GDPR (balancing of interests). The legitimate interest of Nemetschek SE is the assertion, exercise or defense of legal claims.

3. Duration of the storage of personal data

Nemetschek SE stores this personal data for the aforementioned purposes only for as long as is necessary for these purposes.

For the aforementioned purposes, the storage period is generally up to three years after the end of the Annual General Meeting.

If a shareholder is no longer a shareholder of the company, Nemetschek SE will only store their personal data for a maximum of twelve months on the basis of § 67e (2) sentence 1 AktG, subject to other statutory provisions.

In accordance with § 67e para. 2 sentence 2 AktG, data will only be stored for longer, subject to other legal regulations, as long as this is necessary for any legal proceedings for the assertion, exercise or defense of legal claims. In this case, Nemetschek SE stores the data until the end of the respective legal proceedings.

4. Recipients of personal data

For the above-mentioned purposes, the following service provider processes the above-mentioned data on behalf of Nemetschek SE (as a so-called processor):

BADER & HUBL GmbH
Friedrich-List-Strasse 4a
70565 Stuttgart

The service provider receives from Nemetschek SE only such personal data as is necessary for the execution of the commissioned service and processes the data exclusively in accordance with the instructions of Nemetschek SE.

Otherwise, Nemetschek SE will only make the personal data available to shareholders and their proxies as well as third parties in connection with the shareholders' meeting within the framework of the statutory provisions. In particular, Nemetschek SE enters shareholders and their proxies, if they are to be represented at the shareholders' meeting by a voting proxy appointed by the company, disclosing their name, stating their name, place of residence, number of shares and type of ownership in the list of participants of the shareholders' meeting to be drawn up in accordance with Section 129 (1) Sentence 2 AktG. All shareholders and their proxies can view this data during the Annual General Meeting and shareholders can also view it for up to two years afterwards in accordance with Section 129 para. 4 sentence 2 AktG. Please refer to the explanations in sections II.2.e) and II.2.f) of the invitation to the Annual General Meeting of the company on May 20, 2025 for the transmission of personal data to third parties in the context of the announcement of shareholder requests for additions to the agenda as well as counter motions and election proposals by shareholders.

If shareholders and/or their proxies make use of their right to information in accordance with Section 131 para. 1 AktG or speak in any other way, this can be done by stating the name and, if applicable, the place of residence or registered office of the shareholder and/or proxy making the request. Requests for information and other requests to speak can only be acknowledged by other participants in the Annual General Meeting. In the case of shareholder requests for additions to the agenda and in the case of counter motions and election proposals from shareholders, these may be put to the vote at the Annual General Meeting.

5. No transfer of personal data to third countries

Nemetschek SE does not transfer the personal data processed in the context of the annual general meeting to countries outside the European Union or the European Economic Area (so-called third countries).

6. No obligation to provide the data

Shareholders and their proxies are not obliged to provide Nemetschek SE with the above-mentioned data in connection with the Annual General Meeting. The provision is neither legally nor contractually required. The data is also not required for the conclusion of a contract. However, the provision of personal data is mandatory for the exercise of shareholder rights in relation to the Annual General Meeting.

If shareholders and their authorized representatives do not provide the data, Nemetschek SE cannot enable the exercise of shareholder rights in relation to the annual general meeting.

7. No automated decision-making including profiling

Nemetschek SE does not carry out automated decision-making, including profiling, on the basis of personal data in accordance with Art. 22 (1) and (4) GDPR.

III. Rights of data subjects in relation to processing

With regard to the processing of their personal data, shareholders and their authorized representatives have the following rights as data subjects:

- Right to information (Art. 15 GDPR)
- Right to rectification (Art. 16 GDPR)
- Right to erasure ("right to be forgotten") (Art. 17 GDPR)
- Right to restriction of processing (Art. 18 GDPR)
- Right to data portability (Art. 20 GDPR)
- Right to object (Art. 21 GDPR)
- Right to withdraw consent (Art. 7 (3) GDPR)

Special reference is made to the following right to object pursuant to Art. 21 (1) GDPR:

Right to object on grounds relating to the particular situation of the data subject (Art. 21 (1) GDPR)

Shareholders and their authorized representatives have the right as data subjects pursuant to Art. 21 (1) GDPR to object at any time, on grounds relating to their particular situation, to the processing of personal data concerning them which is based on Art. 6 (1) (f) GDPR (see Section II.2.).

In the event of an objection, Nemetschek SE will no longer process the personal data unless Nemetschek SE can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the shareholders and their proxies as data subjects, or for the establishment, exercise or defense of legal claims.

To exercise their rights, data subjects can contact Nemetschek SE or its data protection officer using the contact information provided above. In addition, shareholders and their authorized representatives as data subjects have the right to lodge a complaint with a data protection supervisory authority (Art. 77 GDPR). In particular, data subjects may lodge this right of appeal with the supervisory authority of the (federal) state in which they reside or have their permanent residence, or with the data protection supervisory authority for the non-public sector of the federal state of Bavaria (Bavarian State Office for Data Protection Supervision, BayLDA), in which Nemetschek SE has its registered office.

Further information on the General Data Protection Regulation and the rights of data subjects with regard to the processing of their personal data can be found in the [information brochure of the Federal Commissioner for Data Protection and Freedom of Information \(BfDI\)](#), which is available online.

