

**Non-Binding Convenience Translation
– for information purposes only –**

This English translation is provided for convenience purposes only.
In case of discrepancies between the German and the English version,
the German version shall prevail as the decisive version.

Data protection information for Annual General Meetings of Nagarro SE

Annual General Meeting on June 29, 2022

In the following, we inform you about the processing of your personal data pursuant to Article 13, 14 of the EU General Data Protection Regulation ("**GDPR**") in connection with the holding of Annual General Meetings of Nagarro SE ("**Company**", "**we**"). The Annual General Meeting on June 29, 2022 will be held as a virtual General Meeting without the physical presence of shareholders and their proxies. The privacy information is also available on the Company's website at <https://www.nagarro.com/de/investor-relations/agm> from the date of convening.

I. Who is the entity responsible for data processing?

As the controller within the meaning of Article 4 no. 7 GDPR, the Company processes personal data of shareholders and any shareholder representatives as well as other participants for the purpose of preparing and holding the Annual General Meeting. You can reach the Company at the following contact details:

Nagarro SE
- Management Board -
Einsteinstrasse 172
81677 Munich
Germany
Phone: +49 89 998421 - 0
Fax: +49 89 998421 - 11
Email: info@Nagarro.com

Questions about this privacy information or Nagarro's privacy practices generally may be directed to the email address above or alternatively to datenschutz@nagarro.com.

II. Which of your data do we process and from which sources do these data originate?

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

1. Categories of data processed

Our shares are registered shares. Pursuant to Section 67 AktG, these must be entered in the Company's share register, stating the name, date of birth and address of the shareholder as well as the number of shares or the share number. We also receive shareholder data in particular in connection with the holding of the Annual General Meeting. In connection with the holding of an Annual General Meeting, we process the following personal data: First name, last name, place of residence or address, email address if applicable, the respective shareholding (e.g. number of shares), class of shares, type of ownership of the shares, share register number and number of the admission ticket in the case of an attendance General Meeting; if applicable, name and address of authorized shareholder representatives ("**Registration Information**") and, if applicable, guests and representatives of the press.

In addition, the Company processes data that shareholders provide voluntarily, such as the content of any information they may have provided, including the content of motions, questions and objections ("**Further Shareholder Information**").

When you visit and use our online portal for holding a virtual General Meeting ("**InvestorPortal**"), we also collect and process data on access to and use of the InvestorPortal, e.g. access data to the InvestorPortal (login confirmation number and Internet access code) as well as server log files (name of the files you retrieved, date and time of retrieval, message whether the retrieval was successful, type of web browser used, referrer URL (the previously visited website), IP address, as well as timestamp of your login and logout in the InvestorPortal), which your web browser transmits to us ("**Usage Data**").

2. Data sources

As a rule, we receive your personal data directly from you, in particular when you register in person for the (virtual) General Meeting, submit questions, attend or participate in the (virtual) General Meeting, or exercise your shareholder rights, as well as in the event that you issue a proxy or instructions. Even if you have not provided your personal data such as registration data yourself as part of your registration for the Annual General Meeting, we may obtain this data from the share register and, under certain circumstances, from custodian banks or other third parties involved in the registration process. If you attend or participate in the (virtual) Annual General Meeting as a proxy, we may receive Registration Information and other details about you from the shareholder you represent.

III. For what purposes and on what legal basis do we process your data?

1. Processing purposes

- **Conducting the Annual General Meeting:** Personal data is processed for the purposes stipulated in the German Stock Corporation Act. This primarily includes various processes in connection with the holding of Annual General Meetings (e.g. registration for the Annual General Meeting, documentation of the right to participate and

preparation of the list of participants). Processing also takes place - to the extent legally permissible - for communication with shareholders. In particular, personal data is processed in connection with Annual General Meetings for the purpose of processing the registration and participation of shareholders in the Annual General Meeting (e.g. checking the right to participate) and enabling shareholders to exercise their rights in the context of the Annual General Meeting (including granting and revoking powers of attorney and instructions).

- **Virtual holding of the Annual General Meeting:** On June 29, 2022, the Company will hold this year's Annual General Meeting as a virtual Annual General Meeting without the physical presence of shareholders or their proxies. In the event of a virtual Annual General Meeting being held, shareholders and shareholder representatives will be able to follow the Annual General Meeting by video and audio transmission via our InvestorPortal, which is available online. We process your personal data to prepare, conduct and manage the virtual General Meeting, in particular to communicate with the shareholders, to enable voting, in particular by means of electronic communication via the InvestorPortal, to ensure proper resolution and to prepare the minutes of the virtual General Meeting, and to enable you to exercise your rights relating to the General Meeting, in particular your voting rights (including the exercise of voting rights by absentee ballot or by authorizing the proxy appointed by the Company).

If you register to participate in the virtual Annual General Meeting on the InvestorPortal, we process your Registration Information and Usage Data to verify your eligibility to participate in the virtual Annual General Meeting and to enable you to participate in it, and to make the live stream available.

If you exercise your right to ask questions pursuant to Section 1 para. 2 sentence 1 of the Act on Measures in Corporate, Cooperative, Association, Foundation and Condominium Law to Combat the Effects of the COVID-19 Pandemic as currently amended ("**COVID-19 Act**") and submit questions electronically via the InvestorPortal in advance of the virtual General Meeting, we will store your Further Shareholder Information, including the question content voluntarily provided by you, together with your name. The Company will answer the questions at its discretion, mentioning your name, as part of the virtual Annual General Meeting, or publish the questions together with the answers to them in advance on the Company's website.

If you declare an objection or make, amend or revoke other declarations during the virtual Annual General Meeting, the Company will store this objection or these declarations together with your name. We will only publish your name if you have expressly requested this or if we are legally obliged to do so (e.g. in the case of objections, the name of the objecting shareholder must be included in the notarial record that can later be retrieved from the commercial register).

- **Other processing purposes:** Outside the (virtual) Annual General Meeting, we may process your personal data for purposes that are compatible with the aforementioned purposes (in particular for the compilation of statistics, e.g. for the presentation of

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

Finally, we may process your personal data if and to the extent necessary to exercise and defend our rights, e.g. to defend against shareholder lawsuits and claims.

If we process your personal data for a purpose not mentioned above, we will inform you of this beforehand in accordance with the statutory provisions.

2. Legal bases of the processing

We base the processing of your personal data for the purpose of holding the Annual General Meeting on the German Stock Corporation Act (AktG) in conjunction with Article 6 para. 1 sentence 1 lit. c) and Article 6 para. 1 lit. f), where applicable in conjunction with para. 4, GDPR as the legal basis. The realization of the aforementioned purposes, in particular the preparation, orderly conduct and follow-up of the Annual General Meeting, also constitutes a legitimate interest in the processing of your personal data within the meaning of Article 6 para. 1 lit. f) GDPR.

We base data processing in connection with the conduct of the virtual General Meeting, including the exercise of your rights, on Article 6 para. 1 c) GDPR in conjunction with Section 118 et seqq. AktG and in conjunction with Section 1 of the COVID-19 Act or on Article 6 para. 1 f) GDPR. In this respect, the GDPR expressly provides that processing of personal data may also be justified on the basis of specific legal obligations (outside the GDPR).

Data processing in connection with the authorization of proxies appointed by the Company for the Annual General Meeting is based on our legal obligation within the meaning of Article 6 para. 1 sentence 1 lit. c) GDPR to record the granting of authorization by the Company in a verifiable manner and to keep it protected from access for three years (Section 134 para. 3 sentence 5 AktG).

The legal basis for other data processing is the protection of the legitimate interests of the Company or a third party as set out below in accordance with Article 6 para. 1 sentence 1 lit. f) GDPR.

3. Legitimate interests pursued by the Company

In individual cases, the Company may also process your data to protect the legitimate interests of the Company or a third party pursuant to Article 6 para. 1 sentence 1 lit. f) GDPR.

In particular, the processing of personal data when using the InvestorPortal is carried out in our legitimate interest in enabling our shareholders and shareholder representatives to exercise their shareholder rights in a user-friendly manner. The data processing also serves to ensure a smooth process, to guarantee the security of the virtual Annual General Meeting

including the InvestorPortal, as well as to eliminate malfunctions and to detect and prevent misuse.

For the right to object to the processing of data for legitimate interests, see below **Section VI**.

IV. To which categories of recipients do we disclose your data?

- **External service providers and consultants:** On the occasion of the Annual General Meeting, the Company engages various service providers, e.g. Annual General Meeting service providers for conducting the Annual General Meeting including the operation of the InvestorPortal for the virtual Annual General Meeting, service providers for printing and mailing shareholder notifications, etc.) and consultants. These only receive personal data from the Company that is required for the performance of the commissioned service. The service providers used are bound by order processing agreements and process the data exclusively in accordance with the Company's instructions.
- **Other shareholders and shareholders attending the Annual General Meeting:** If you attend the Annual General Meeting, we are obliged under Section 129 para. 1 sentence 2 AktG to enter your name, place of residence, number of shares and type of ownership in the register of participants. This data can be viewed by participants in the Annual General Meeting or other shareholders during the meeting and by shareholders for up to two years afterwards (Section 129 para. 4 AktG). In the case of a virtual General Meeting, this personal data will not be included in the list of participants as you are not legally considered to be a participant in the General Meeting.
- **Publication of certain information:** If a shareholder requests that items be placed on the agenda (Section 122 para. 2 AktG), the Company will publish these items, stating the name of the shareholder if the requirements under stock corporation law are met. Similarly, the Company will publish counter motions and election proposals from shareholders on the Internet, stating the name of the shareholder, if the requirements under the provisions of stock corporation law are met (Sections 126 para. 1, 127 AktG).
- **Authorities and other recipients:** In addition, we may be obliged to disclose your personal data to further recipients, such as authorities for the fulfillment of statutory notification obligations (e.g. in the case of voting rights notifications).
- **International data transfers:** There are currently no plans for data transfers to third countries outside the EU/EEA where an adequate level of data protection does not apply from the perspective of EU data protection law.

V. How long will your data be stored?

As a matter of principle, we anonymize 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 (under the German Stock Corporation Act, the German Commercial Code, the German Fiscal Code or other legal provisions) oblige us to continue storing it. For data collected in connection with Annual General Meetings, including server log files, the storage period is regularly up to three years (subject to special legal requirements).

Insofar as retention obligations under commercial and tax law are applicable, the data must regularly be retained for another ten years. Beyond this, we only retain personal data in individual cases if this is necessary in connection with claims asserted against us (statutory limitation periods of up to thirty years).

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

Under applicable data protection law, you have the following rights:

With regard to the processing of personal data, shareholders and shareholder representatives as well as guests and press representatives may request from the Company **access** to on their personal data pursuant to Article 15 GDPR, **rectification** (Article 16 GDPR), **erasure** (Article 17 GDPR) as well as **restriction of processing** of their personal data (Article 18 GDPR) and **transfer** of certain personal data to them or to a third party designated by them (right to data portability) pursuant to Article 20 GDPR.

Right to object

Pursuant to Article 21 para. 1 GDPR, you also have the right to **object** to the processing of your data for the protection of the legitimate interests of the Company or a third party:

If we process your data to protect the legitimate interests of the company or a third party, you may object to this processing if grounds arise from your particular situation that conflict with this data processing. We will then stop this processing if we cannot demonstrate that there are compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subjects, or the processing serves the purpose of asserting, exercising or defending legal claims.

You may exercise your foregoing rights by contacting us or our data protection officer, for example, at the contact information provided in **Section I.** contact details mentioned above.

If you have any complaints regarding the processing of your personal data, you may contact the Company or its data protection officer using the contact details provided in **Section I.** in order to obtain immediate clarification with the Company. Independently of this, you may contact a data protection supervisory authority. The data protection supervisory authority responsible for the Company is:

Bavarian State Office for Data Protection Supervision
PO Box 1349
91504 Ansbach, Germany
Phone: +49 (0) 981 180093-0
Fax: +49 (0) 981 180093-800
Email: Email: poststelle@lda.bayern.de

Status: May 2022

In the event of relevant changes, we will update this privacy information with effect for the future and make it available on our website. We therefore recommend that you read this data protection information again at regular intervals. 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.

This data protection information relates to data protection issues in connection with the position as a shareholder. Data protection information relating to the use of our website can be found at <https://www.nagarro.com/de/privacy-policy>.

* * * * *