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Data protection information for general meetings of Nagarro SE

Annual General Meeting on 31 August 2021

In the following, we inform you about the processing of your personal data pursuant to Art. 13, 14 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 31 August 2021** 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 data controller?

The Company, as the responsible body within the meaning of Art. 4 No. 7 DSGVO, processes personal data of the shareholders and any shareholder representatives as well as other participants in order to prepare and conduct the Annual General Meeting. You can reach the company under the following contact details:

Nagarro SE
- Board of Directors -
Einsteinstr. 172
81677 Munich
Phone: +49 89 998421 - 0
Fax: +49 89 998421 - 11
E-mail: info@Nagarroinfo@Nagarro.com

Questions about this privacy statement or Nagarro's privacy practices generally can 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 DSGVO, the German Federal Data Protection Act (BDSG), the German Stock Corporation Act (AktG) and all other relevant legal provisions.

1. Categories of data processed

Our shares are registered shares. Pursuant to § 67 of the German Stock Corporation Act (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 conduct of the Annual General Meeting. In connection with the conduct of a general meeting, we process the following personal

data: First name, last name, place of residence or address, e-mail 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 authorised shareholder representatives ("**registration information**") as well as guests and representatives of the press if applicable.

In addition, the Company processes data voluntarily provided by shareholders, such as the content of any information provided by you, including the content of any 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**

We usually receive your personal data directly from you, in particular when you register in person for the (virtual) Annual General Meeting, submit questions, attend or participate in the (virtual) Annual General Meeting or exercise your shareholder rights, as well as in the case of granting a power of attorney and issuing instructions.

Even if you have not provided your personal data such as registration details yourself in the course of registering for the Annual General Meeting, we may obtain these 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) AGM as a proxy, we will receive registration information and other details about you from the shareholder you represent, if applicable.

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

1. **Purposes of the processing**

- **Conducting the Annual General Meeting:** Personal data is processed for the purposes provided for in the German Stock Corporation Act. This primarily includes various processes in connection with the conduct of general meetings (e.g. registration for the general meeting, documentation of the right to participate and preparation of the list of participants). The processing also takes place - to the extent legally permissible - for communication with

shareholders. In particular, the processing of personal data in connection with general meetings is carried out for the purpose of processing the registration and participation of the shareholders in the general meeting (e.g. verification of the right to participate) and to enable the shareholders to exercise their rights in the context of the general meeting (including the granting and revocation of powers of attorney and instructions).

- **Virtual Annual General Meeting:** On 31 August 2021, the Company will hold an Annual General Meeting as a virtual Annual General Meeting without the physical presence of the shareholders or their proxies. In the event of a virtual Annual General Meeting, shareholders and shareholder representatives can participate in the Annual General Meeting via video and audio transmission through our online InvestorPortal. 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 way 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 general meeting-related rights, in particular voting rights (including the exercise of voting rights by postal vote or by authorising the proxy appointed by the Company).

When you register to participate in the virtual AGM on the InvestorPortal, we process your registration information and usage data to verify your eligibility to participate in the virtual AGM and to enable you to participate in it, and to provide the live stream.

If you make use of your right to ask questions pursuant to § 1 para. 2 sentence 1 no. 3 of the Act on Measures in Company, Cooperative, Association, Foundation and Condominium Law to Combat the Effects of the COVID 19 Pandemic ("**C19-AuswBekG**") and submit questions electronically via the InvestorPortal in advance of the virtual Annual General Meeting, we will store your Further Shareholder Information including the question content voluntarily provided by you together with your name. The Company will, at its discretion, answer the questions by mentioning your name at the virtual general meeting or publish the questions together with the answers in advance on the Company's website.

If you declare an objection or make, change or revoke other declarations during the virtual 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 as well as stock corporation, commercial and tax law retention obligations, to the extent 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 within the framework of the legal 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 Art. 6 para. 1 sentence 1 lit. c) and Art. 6 para. 1 lit. f), if applicable in conjunction with Art. 6 para. 4 DSGVO as the legal basis. Para. 4 DSGVO as the legal basis. The realisation 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 Art. 6 para. 1 lit. f) DSGVO.

We base data processing in connection with the conduct of the virtual Annual General Meeting, including the exercise of your rights, on Art. 6 para. 1 lit. c) DSGVO in conjunction with Art. 118 et seq. § 118 et seq. AktG and in conjunction with. § 1 C19-AuswBekG or on Art. 6 para. 1 lit. f). DSGVO. In this respect, the GDPR expressly provides that the processing of personal data may also be justified on the basis of specific legal obligations (outside the GDPR).

Data processing in connection with the authorisation of proxies appointed by the Company for the Annual General Meeting is based on our legal obligation within the meaning of Art. 6 para. 1 sentence 1 lit. c) of the German Data Protection Regulation (DSGVO) to record the granting of proxies by the Company in a verifiable manner and to keep it protected from access for three years (Art. 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 Art. 6 para. 1 sentence 1 lit. f) DSGVO.

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 in accordance with Art. 6 (1) sentence 1 lit. f) DSGVO.

In particular, the processing of personal data when using the InvestorPortal is carried out in our legitimate interest to enable 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 **section VI** below.

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

- **External service providers and consultants:** The company commissions various service providers on the occasion of the Annual General Meeting, e.g. Annual General Meeting service providers for the implementation of the Annual General Meeting including the operation of the Investor Portal for the virtual Annual General Meeting, service providers for the printing and dispatch of shareholder notifications, *etc.*) and consultants. These service providers only receive personal data from the company that is required for the execution of the commissioned service. The service providers used are covered by order processing agreements and process the data exclusively according to the instructions of the company.
- **Other shareholders and main meeting participants:** If you participate in the Annual General Meeting, we are obliged under section 129 (1) sentence 2 AktG to enter your name, place of residence, number of shares and type of ownership in the list of participants. This data can be viewed by AGM participants or other shareholders during the meeting and by shareholders for up to two years afterwards (§ 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 a participant in the general meeting.
- **Publication of certain information:** If a shareholder requests that items be placed on the agenda (section 122 (2) of the AktG), the company will publish these items, stating the name of the shareholder if the requirements under the provisions of the German Stock Corporation Act are met. Likewise, the company will publish counter motions and election proposals of shareholders on the internet, stating the name of the shareholder, if the requirements under the provisions of the Stock Corporation Act are met (§§ 126 para. 1, 127 Stock Corporation Act).
- **Authorities and other recipients:** 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).

- **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 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 (according to 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 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 should be 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 our company (statutory limitation periods of up to thirty years).

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

You have the following rights under applicable data protection law:

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** their personal data pursuant to Art. 15 GDPR, **rectification** (Art. 16 GDPR), **erasure** (Art. 17 GDPR) as well as **restriction of the processing of** their personal data (Art. 18 GDPR) and **transfer of** certain personal data to them or to a third party designated by them (right to data portability) pursuant to Art. 20 GDPR.

Right of objection

Pursuant to Art. 21 (1) DSGVO, 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 can exercise your above rights by contacting us or our data protection officer, for example, using the contact details provided in **section I**.

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. above in order** to seek clarification with the Company directly. 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

Phone: +49 (0) 981 180093-0

Fax: +49 (0) 981 180093-800

E-mail: E-mail: poststelle@lda.bayern.de

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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 comply with this existing notification obligation accordingly.

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