

Information on data protection

Compliance with the provisions of data protection law is very important to Vitesco Technologies Group Aktiengesellschaft (hereinafter "we" or "us"). In the following, we would like to inform you about the processing of your personal data and your rights under data protection law.

The controller

The controller of the processing of personal data is Vitesco Technologies Group Aktiengesellschaft. You can contact Vitesco Technologies Group Aktiengesellschaft under the following address:

Vitesco Technologies Group Aktiengesellschaft
Siemensstraße 12
93055 Regensburg
Telephone: +49 941-2031-0
Email: contact@vitesco.com

You may address your questions or comments on the processing of personal data to the data protection officer of Vitesco Technologies Group Aktiengesellschaft at:

Vitesco Technologies Group Aktiengesellschaft
Konzerndatenschutz
Siemensstraße 12
93055 Regensburg
Email: dataprotection@vitesco.com

Purposes and legal bases of the data processing

We process your personal data (e.g., first and last name, address, email address, share-related data such as the number of shares held, type of shares held, type of ownership of shares, and data related to the General Meeting such as the shareholder number, admission ticket number, the individual access number for the InvestorPortal, absentee votes, instructions, authorizations to proxyholders or authorizations to third parties) and the personal data of your authorized representatives, if any, in accordance with the EU General Data Protection Regulation (GDPR), the German Federal Data Protection Act (BDSG), the German Stock Corporation Act (AktG) and all other applicable legal provisions.

Processing in connection with registered shares

The shares of Vitesco Technologies Group Aktiengesellschaft are no-par value registered shares. In the case of such registered shares, the statutory provision of Sec. 67(1) sentence 1 AktG stipulates that they must be entered in the Company's share register, stating the shareholder's name, his/her date of birth, the shareholder's address and email address, and the number of shares held or the identification number of such shares. Pursuant to Sec. 67(1) sentence 4 AktG, the shareholder is obliged to provide this information to the Company. Insofar as the shareholder does not himself/herself provide his/her personal data, we will generally obtain this data and the personal data of the shareholder's authorized representatives, if any, from the shareholder's depository bank.

Vitesco Technologies Group Aktiengesellschaft may, as a rule, process this personal data pursuant to Sec. 67e AktG for the purposes of identification, the communication with the shareholders, the exercise of the shareholders' rights, the maintenance of the share register and the cooperation with the shareholders. The legal basis for the data processing is point (c) of Article 6(1) sentence 1 GDPR in conjunction with Secs. 67(1) and 67e(1) AktG.

Preparation, conduct and follow-up of the virtual Annual General Meeting

We process personal data of shareholders and of their authorized representatives, if any, to the extent that this is necessary for the preparation, conduct and follow-up of the virtual Annual General Meeting. This includes in particular the following personal data:

- first and last name;
- title;
- address;
- data in connection with the shareholding (number of shares, class of shares, type of ownership of shares);
- data in connection with the Annual General Meeting, for instance information on the admission ticket, shareholder number, information about motions, questions or election proposals;
- additional contact details, for instance email addresses, or shipping addresses (if any);
- data regarding the content of communication, e.g., in questions addressed to us or in the case of an objection to the notarized minutes;
- authorization granted to proxyholders; and
- individual access number for the InvestorPortal.

We process the data for the proper preparation, conduct and follow-up of the virtual Annual General Meeting and to comply with our obligations under stock corporation, regulatory, securities, commercial or tax laws, for instance mailing the invitations to the Annual General Meeting, broadcasting the virtual Annual General Meeting in the InvestorPortal and preserving the proofs that proxy or the authorization to cast a vote by absentee voting has actually been granted. This also includes that all shareholders and, if applicable, their authorized representatives attending the Annual General Meeting are included in the list of participants that is to be maintained by law; in case that a vote is cast by absentee voting, however, the name of the shareholder is not disclosed in the list of participants. In addition, this includes the exercise of the right to speak, the right to ask questions and the right to file motions during the Annual General Meeting and the right to have objections and questions recorded in the notarized minutes.

The legal basis for the processing in these cases is, as a rule, point (c) of Article 6(1) sentence 1 GDPR in conjunction with Secs. 67, 67e and Secs. 118 et seqq. AktG or other requirements under stock corporation, regulatory, securities, commercial or tax law provided that the processing is necessary to comply with a legal obligation to which we are subject. This applies in particular in connection with the processing of registrations for the Annual General Meeting pursuant to Sec. 123(2) AktG in conjunction with § 18 of Vitesco Technologies Group Aktiengesellschaft's Articles of Association as well as the obligation to prepare and make available the list of participants pursuant to Sec. 129 AktG and enabling the exercise of shareholders' rights (motions pursuant to Sec. 126(1) AktG, election proposals pursuant to Sec. 127(1) AktG, voting right pursuant to Sec. 134 AktG, right to information pursuant to Sec. 131 AktG).

In all other respects, we base the data processing on our legitimate interests according to point (f) of Article 6(1) sentence 1 GDPR to the extent that the data processing is expedient for preparing the Annual General Meeting and ensuring that the Meeting runs smoothly. In this respect, there is no statutory or contractual obligation stipulating that personal data must be provided.

Using the InvestorPortal

When you visit our InvestorPortal, we process the following personal data for technical reasons:

- name of the retrieved file;
- date and time of the retrieval;
- notification whether the retrieval was successful;
- browser type and version;
- referrer URL (the previously visited site), if any; and
- IP address.

We process this personal data on the basis of point (c) of Article 6(1) sentence 1 GDPR in order to provide us with the technical conditions to have the website properly displayed on your device and thus enabling us to hold the virtual Annual General Meeting. To the extent that the processing of this personal data is not necessary for organizing and conducting the General Meeting, we process this personal data on the basis of our legitimate interests (point (f) of Article 6(1) sentence 1 GDPR). The data will in each case be erased after 28 days at the latest.

Otherwise, we use your personal data in our InvestorPortal, in principle, only for the purpose for which the data was made available to us, for instance, in order to enable you to access the General Meeting services, for an individual registration or electronic registration, for the documentation of the fact that you will be represented by a proxyholder under an authorization and for the documentation of any instructions that you may have issued, for the casting of votes by absentee voting (where offered), for communication in the context of contact and service requests in connection with the General Meeting or in order to provide you with access to specific information.

We also use technically necessary cookies in our password-protected InvestorPortal in order to ensure the functionality of the website. Cookies are small text files that store information on the user behavior when visiting a website and that are stored on the user's computer and held available for further visits to the website. In the password-protected InvestorPortal relating to the General Meeting, only X-XSRF-TOKEN and AspNetCore.Antiforgery.8-SwGiRsH58 as technically necessary cookies are used. All data included in the cookies will be encrypted and coded. You may also delete the cookies via your browser settings. However, please note that, if you do this, you may not be able to use the full functionality of the InvestorPortal. The legal basis for this is Sec. 25(2) no. 2 of the German Telecommunications and Telemedia Data Protection Act (*Telekommunikation-Telemedien-Datenschutz-Gesetz*).

Contacting us

If you communicate with us via email or another channel, we process your personal data (contact details like first and last name, address, email address as well as content data of the communication) pursuant to point (b) of Article 6(1) sentence 1 GDPR to the extent that the data processing is necessary for performing a contract with you, pursuant to point (c) of Article 6(1) sentence 1 GDPR to the extent that this is necessary for organizing and conducting the virtual Annual General Meeting, and in all other cases on the basis of our legitimate interests pursuant to point (f) of Article 6(1) sentence 1 GDPR. Our legitimate interests in these cases are the proper conduct of the Annual General Meeting and the processing of enquiries.

Recipient(s) of your data

For the organization of the Annual General Meeting (e. g., for printing and sending of the invitation documents or for conducting the virtual Annual General Meeting), we commission, to some extent, third-party service providers that will be granted access to your personal data in the context of the tasks assigned to them. The service providers commissioned by us for these purposes will process the personal data of the shareholders and, as the case may be, the authorized representatives exclusively as instructed by us and based on corresponding agreements, and only to the extent this is necessary for the performance of the services commissioned. All our employees and the employees of the commissioned service providers who have access to and/or process the personal data of the shareholders or, as the case may be, their authorized representatives are obliged to treat this data as confidential.

Furthermore, we may be obligated to transmit your personal data to further recipients such as, for instance, public authorities in order to comply with statutory reporting obligations or to other shareholders or, as the case may be, their authorized representatives/participants of the General Meeting. This applies, in particular, under the following legal requirements:

- disclosure of the list of participants pursuant to Sec. 129(4) AktG to the participants and shareholders' right of inspection;
- announcement of motions to have items added to the agenda submitted by a minority pursuant to Sec. 124(1) AktG to participants of the General Meeting and shareholders; and
- communication of countermotions and election proposals pursuant to Secs. 126, 127 AktG to intermediaries, shareholders' associations and shareholders.

In addition, personal data of shareholders and their authorized representatives exercising their right to vote or other rights at the Annual General Meeting may be disclosed to attendees of the Annual General Meeting based on our legitimate interests. To the extent necessary, we may also transmit data to notaries and lawyers commissioned by us, who are subject to a duty of confidentiality under professional law (*Berufsrecht*), for purposes of conducting the Annual General Meeting or safeguarding our legitimate interests.

The legal basis for such a disclosure is given in point (c) of Article 6(1) sentence 1 GDPR in conjunction with other statutory provisions, including, but not limited to, Secs. 67e, 118 et seqq., and 130a AktG, or constituted by our legitimate interests to the extent that a disclosure of the personal data is not legally required (point (f) of Article 6(1) sentence 1 GDPR).

Your personal data will not be transferred to recipients in countries outside the European Union or the European Economic Area.

Data sources

As a rule, we collect your personal data directly from you. If you hold registered shares, we may also have collected data from the share register. In addition, data may also be provided by the depository bank acting on behalf of the shareholder in question.

In the case that voting rights are exercised by proxy, we have collected your name and address from the shareholder you represent in each case.

Attendance is not possible if the personal data required for holding the Annual General Meeting is not provided.

Storage period

Your personal data will be erased or anonymized if it is no longer required for the above mentioned purposes of the processing, the personal data is no longer required for any administrative or court proceedings, if any, and no other statutory obligations to furnish evidence or record retention requirements (e. g., under the AktG, the German Commercial Code (*Handelsgesetzbuch*) or the German Tax Code (*Abgabenordnung*)) apply or any other reasons justifying the storage exist.

Data collected in connection with the Annual General Meeting will be stored, as a rule, for up to three years. The list of participants must be kept for at least two years (Sec. 129(4) AktG). We must generally retain the data stored in the share register for ten years after the shares were sold (in particular Secs. 239(1), 257 HGB). Beyond that, we only retain your personal data on a case-by-case basis to the extent that this is necessary in connection with possible claims asserted against us. The relevant statutory limitation period is generally three years, but in some cases may be up to thirty years.

Information about your rights

Subject to the statutory requirements, the shareholders and, as the case may be, their authorized representatives have the right to access information about their processed personal data (Article 15 GDPR) and to require rectification (Article 16 GDPR) or erasure (Article 17 GDPR) of their personal data, the restriction of processing (Article 18 GDPR) or the transmission of their data

(Article 20 GDPR); whether or not these statutory requirements have been met is a matter that has to be determined on a case-by-case basis.

To the extent that we process the data based on our legitimate interests (point (f) of Article 6(1) sentence 1 GDPR), you have the right to object to the processing (Article 21 GDPR). We will then no longer process the personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims.

You can assert the aforementioned rights free of charge by using the contact details provided above.

Right to lodge a complaint

In addition, you have the right to lodge a complaint with a competent data protection supervisory authority, in particular in the Member State of your habitual residence, place of work or place of alleged infringement, if you consider that the processing of your personal data infringes applicable data protection law (Article 77 GDPR). The authority competent for us is the Bavarian State Office for Data Protection Supervision (*Bayerisches Landesamt für Datenschutzaufsicht, BayLDA*), Promenade 18, 91522 Ansbach.

Regensburg, March 2024

**Vitesco Technologies Group Aktiengesellschaft
The Executive Board**