

Data protection information for shareholders of Zalando SE

Protecting your personal data and processing it in compliance with the law is a matter of high priority for us. For this reason, we would like to inform you herewith about the collection, processing and use of your personal data by Zalando SE and your rights under the data protection provisions set out in the General Data Protection Regulation (**GDPR**) and the German Federal Data Protection Act (*Bundesdatenschutzgesetz* - **BDSG**).

1. Who is responsible for data processing?

The entity responsible for processing your personal data is:

Zalando SE
Valeska-Gert-Straße 5
10243 Berlin
Germany
Phone: + 49 (0)30 2000 88 400
Fax: +49 (0)30 275 94 693
Email: info@zalando.de

Should you have any questions on this data protection information, you can contact the responsible Data Protection Officer of Zalando SE by post or by email at the following address:

Zalando SE
Valeska-Gert-Straße 5
10243 Berlin
Germany
Fax: +49 (0)30 2759 46 93
Email: datenschutz@zalando.de

2. What personal data do we process and where do we get it from?

We process your following personal data:

- Personal data (e.g. first and surname, title (if applicable), surname at birth (if applicable), date of birth, gender, nationality, profession/sector, address, including a history of address changes and other contact details (e.g. your shipping address));
- Shareholder data and information on your shareholding (number of shares, class of shares, type of ownership of shares and number of admission card, investment date, settlement bank);
- Name and address of your proxy, if applicable;
- Login data for the online shareholder service of Zalando SE.

To the extent that the personal data are not indicated by you or by your proxy in the context of the registration process for the general meeting, the personal data of the shareholders or the proxy will be communicated to the company by the custodian bank or by a third party involved in the registration process.

3. For what purposes and on what legal basis will your data be processed?

We process your personal data in compliance with the provisions of the GDPR, the BDSG, the German Stock Corporation Act (*Aktiengesetz - AktG*) as well as any other relevant legal provisions.

For the participation of the shareholders in the general meeting and for the exercise of their rights their personal data must mandatorily be processed. Your personal data will be used only for the purposes set forth in the German Stock Corporation Act. These purposes include the communication with shareholders and various processes in connection with the handling of general meetings. Personal data is processed in relation to general meetings for the purpose of managing shareholders' registration for and attendance of the general meeting (e.g. checking the right of attendance, preparing the list of participants) and allowing shareholders to exercise their rights in connection with the general meeting (including the granting and revocation of proxies). The legal basis for processing your personal data in this context is the German Stock Corporation Act in conjunction with Art. 6(1) lit. c) GDPR.

In addition, we process data transferred to us by you or other parties subject to notification obligations (notifying persons) as part of voting rights notifications under the German Securities Trading Act (*Wertpapierhandelsgesetz*). The relevant statutory provisions and Art. 6(1) lit. c) GDPR serve again as the legal basis for processing data in these cases.

In addition, your personal data may also be processed for meeting further legal obligations such as regulatory requirements as well as retention obligations under stock corporation law, commercial law and tax law. We are required, for example, to record the power of attorney granted to the proxy holders appointed by us for the general meeting so that it can be verified and to keep and protect it against third-party access for a period of three years. The relevant legal basis in these cases is again Art. 6(1) lit. c) GDPR.

We are furthermore entitled to process your data for safeguarding our legitimate interests or the legitimate interests of a third party in accordance with Art. 6(1) lit. f) GDPR. This is the case, for example, when we prepare analyses and statistics (e.g. for describing the shareholder structure and development or the trading volumes or presenting a survey of our major shareholders) or when we have to exclude, in case of any capital increases, individual shareholders or groups of shareholders, due to their nationality or place of residence, from the provision of information on subscription offers to avoid a breach of law in specific countries. Furthermore, we have a legitimate interest when we wish to prevent or disclose illegal activities, fraud or similar threats in order to protect ourselves against any damage. Before processing your data on the basis of our legitimate interests, we will check on a case-by-case basis by way of a balancing of interests whether our interests outweigh your interests. You can obtain further details about such a balancing of interests from our Data Protection Officer at the address specified under no. 1 above.

If we intend to process your personal data for any purpose other than those mentioned above, we will inform you of any such intention in advance in compliance with the statutory provisions and obtain your consent, if required.

4. With which recipients do we share you data?

For managing our general meetings, we make use of external service providers, e.g. service providers for the organization of general meetings, for printing and sending invitations to general meetings and notifications to shareholders as well as for conducting general meetings (primarily checking attendance, technical infrastructure for voting and documentation of the general meeting). However, the service providers commissioned by us receive only such personal data that is required for the provision of the service requested and they process the data exclusively in accordance with our instructions.

Other shareholders and persons attending the general meeting can inspect your data contained in the list of participants during the meeting and, if applicable, during a period of up to two years thereafter.

If a shareholder requests any items to be added to the agenda, we will announce such items by indicating the name of the shareholder, provided that the requirements under German stock corporation law are met. We will also publish shareholders' counter-motions and election proposals on the company's website by indicating the name of the shareholder in accordance with German stock corporation law, provided the requirements are met.

We furthermore make use of external service providers for conducting the analyses mentioned under no. 3 above.

Finally, we may be required to transfer your personal data to further recipients, e.g. when publishing voting rights notifications in accordance with the provisions of the German Securities Trading Act, or to authorities in order to comply with statutory notification requirements (e.g. to tax authorities or prosecuting authorities).

Your data is processed solely in the European Union.

5. How long do we store your data?

We will erase or anonymize your personal data once it is no longer needed for the aforementioned purposes and to the extent that we are no longer required to continue storing such data in compliance with statutory obligations of documentation or retention (e.g. under the German Stock Corporation Act, the German Commercial Code, the German Fiscal Code or other legal provisions).

In addition, we also retain data if required in relation to claims asserted by or against our company or for safeguarding our aforementioned legitimate interests.

If you have specific questions concerning the storage period, please contact our Data Protection Officer.

6. How do we protect your data?

We maintain appropriate technical and organizational security measures to protect

your personal data against any accidental, unlawful or unauthorized destruction, loss, alteration, disclosure or use.

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

Within the scope of the applicable data protection laws, you have a right of access to information concerning the personal data stored with regard to your person, including information such as the origin and categories of the data, the purposes of processing, the recipients (or categories of recipients) and the relevant period of retention. In addition, you may claim rectification and, in certain circumstances, erasure of your personal data. Furthermore, you may be entitled to restrict the processing of your personal data (e.g. if the processing of your data is unlawful) and to request the surrender of the data provided by you in a structured, commonly used and machine-readable format (and, where applicable, to request the transfer of such data to another controller).

Right to object to the processing of data for safeguarding legitimate interests

If and to the extent we process your data for safeguarding legitimate interests of Zalando SE or a third party, you have the right to object to any such processing if there are grounds arising from your particular situation that are opposed to such data processing. In such case, we will cease the processing unless we can provide evidence of compelling legitimate grounds for the processing that outweigh your interests, rights and freedoms or if the processing serves the purpose of asserting, exercising or defending legal claims.

You can assert the aforementioned rights by contacting our Data Protection Officer at the address specified under no. 1 above. Please note that there may be statutory exceptions (e.g. continuing retention obligations) that may limit the exercise of your rights.

8. Do you have any complaints about the handling of your data?

If you have any complaint regarding the processing of your personal data, you can contact our Data Protection Officer using the contact details listed at no. 1 above to clarify the facts directly with us.

Irrespective thereof, you also have the right to lodge a complaint with a competent data protection supervisory authority.

The competent supervisory authority can be found via the following link: https://www.bfdi.bund.de/DE/Infothek/Anschriften_Links/anschriften_links-node.html

The information in this document was updated in: April 2019

In case of any relevant changes, we will provide an update of this information on our website <https://corporate.zalando.com/en/investor-relations/annual-general-meeting-2019>. Furthermore, we will review on a case-by-case basis whether a change of this

information will give rise to any obligation to provide another form of notification and will comply with any such notification obligation accordingly.
