

Convenience translation: The German version shall prevail.

Information on the processing of personal data for shareholders, shareholder representatives and other participants in the Annual General Meeting of Vossloh AG

Protecting your data and your privacy is very important to Vossloh AG. In this privacy statement, we detail which of your personal data we process in your role as our shareholder, as the legal or authorized representative of a shareholder, or as any other participant involved in the preparation, conduct and follow-up of our virtual Annual General Meeting, as well as your rights pursuant to Regulation (EU) 2016/679 (EU General Data Protection Regulation - 'GDPR') and the German Federal Data Protection Act (*Bundesdatenschutzgesetz*, 'BDSG') regarding the processing of your data.

We are holding the 2022 Annual General Meeting as a virtual event without physical presence of the shareholders, using telecommunications and providing electronic access to the Annual General Meeting. Shareholders, their proxies and other interested parties will thus not be able to physically attend the Annual General Meeting. However, they can follow the entire Annual General Meeting via a video and audio broadcast on the internet (via the InvestorPortal, through which the electronic broadcast will be made available). The InvestorPortal is operated by our service provider Computershare Deutschland GmbH & Co. KG, Elsenheimerstrasse 61, 80687 Munich, Germany, solely on our behalf and in accordance with our instructions. It is accessible via the Company's website at www.hauptversammlung.vossloh.com.

1. Who is responsible for data processing?

The party responsible for data processing is:

Vossloh AG
Vosslohstrasse 4
58791 Werdohl
Germany
Phone: +49 2392 52 - 0
Email: hauptversammlung@vossloh.com

Our Data Protection Officer can be contacted at:

Vossloh AG
Data Protection Officer for Vossloh AG
Vosslohstrasse 4
58791 Werdohl
Germany
Email: datenschutzbeauftragter@vossloh.com

2. Which personal data are processed?

In order to hold our virtual Annual General Meeting, we process the following personal data of our shareholders:

- Name, title
- Address and additional contact details
- Number of shares, type of shares, custodian bank
- Individual login credentials for the InvestorPortal
- Other data that is provided in the context of the registration for the Annual General Meeting (e.g. email address or phone number)

We also process the name and address of any authorized representative of the shareholder.

Insofar as we make contact with any other interested persons (guests), such as press representatives, in order to enable them to access the virtual Annual General Meeting via a separate access channel to the InvestorPortal, we process their names, and, as the case may be their respective function, as well as the contact information required for the specific form of communication (e.g. email address or postal address).

In case shareholders, their authorized representatives or other persons contact us, we additionally process any personal data that is required for responding to their inquiry, e.g. the email address or phone number.

If you visit our InvestorPortal on the internet, we save your consent to our conditions for use and collect data on visits to our InvestorPortal. The following data and device information is logged in the web server log files:

- data that are requested and/or received;
- date and time data are received;
- information on whether data were successfully received;
- type of web browser used;
- referrer URL (i.e. the previously visited web page);
- IP address;
- voting card number and session ID; and
- login.

Your browser automatically transmits this data to us when you visit our InvestorPortal.

We also make use of so-called web storage functions. These involve the storage of data on your device in your browser's local cache. After you log in, we collect data on your authentication token (i.e. your 'virtual admission ticket') and session data using the session storage technique. This ensures that you are recognized as a user if, during an active session, you visit a different page in the InvestorPortal, return to our website, or have to reload the web page. We use the local storage technique to save the time stamp of your login; this makes it possible for you to be automatically logged out as a security measure after 30 minutes of inactivity. These data are automatically deleted when your browser is closed. In your browser menu, you will find information on how you can use technical means to deny authorization for the placement of web storage objects, as well as information regarding how you can set your browser such that you will be notified if a new web storage object is placed on your device. Please note that some functions of our website may not work in the event that web storage objects are deactivated.

Finally, we also process information regarding motions, questions, objections, appointment proposals and other requests that are submitted by shareholders or their authorized representatives in relation to the Annual General Meeting, as well as information regarding their voting behavior. Should you avail yourself of the possibility of submitting a video message, we will also process your video image, your voice, and your statement.

3. For what purposes and on what legal basis are data processed?

We process your personal data in compliance with the provisions of the GDPR, the BDSG, the Telecommunication and Telemedia Data Protection Law (*Telekommunikations-Telemedien-Datenschutz-Gesetz*, 'TTDSG'), the German Stock Corporation Act (*Aktiengesetz*, 'AktG'), and other relevant legal provisions.

You may use the InvestorPortal, among other things, to follow the audio and video broadcast of the virtual Annual General Meeting, exercise voting rights, grant powers of attorney, submit questions, or raise objections for the record. In order to utilize the InvestorPortal, you must login using the login data (voting card number and verification code) you receive along

with your voting card, as well as the password you generate yourself. The user interface of the InvestorPortal will then display a range of buttons and menus by means of which you can exercise your various rights. The use of the InvestorPortal is subject to the conditions for use found therein. As a guest, you can only use a separate access channel to the InvestorPortal to follow the audio and video broadcast of the virtual Annual General Meeting.

a) Operation of the InvestorPortal

The processing of the aforementioned login details and device information in web server log files and the use of web storage elements are technical requirements for the provision of the InvestorPortal and for recognizing misuse, rectifying faults, and ensuring the smooth operation of the virtual Annual General Meeting. Section 25(2) No. 2 of the TTDSG is thus the legal basis for the storage of information in the web storage elements. With a view to all other data processing required for the operation of the InvestorPortal, we have a legitimate interest in providing you with the InvestorPortal as a service that facilitates the user-friendly exercise of shareholder rights by shareholders and their proxies and to allow you to join the virtual Annual General Meeting. For shareholders, the legal basis for this processing is provided by Art. 6(1) lit. c) of the GDPR in conjunction with Section 67e(1) of the AktG, while for their authorized representatives and guests, the legal basis is provided by Art. 6(1) lit. f) of the GDPR.

b) Identity verification

When you login to the InvestorPortal, we process your login information (voting card number, verification code, and password) to verify your authorization to participate in or carry out preparatory steps for the virtual Annual General Meeting as a shareholder or shareholder representative.

The processing is performed to satisfy our obligations under the German Stock Corporation Act according to Sections 118 et seqq. of the AktG. The legal basis for this processing is provided by Art. 6(1) lit. c) of the GDPR in conjunction with Section 67e(1) of the AktG.

Should you login as a guest, we process your login information to ensure that only our invited guests can join the Annual General Meeting. To this end, we have a legitimate interest in controlling access to our virtual Annual General Meeting. The legal basis for this processing is provided by Art. 6(1) lit. f) of the GDPR.

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

We process your personal data in order to prepare, conduct and follow up on the Annual General Meeting, in particular to process the registration and participation of shareholders and shareholder representatives for the virtual Annual General Meeting (e.g. verification of eligibility to participate, compilation of the list of attendees, sending the voting cards) and to enable shareholders and shareholder representatives to exercise their rights in connection with the virtual Annual General Meeting (including the granting and revocation of powers of attorney and voting instructions).

In particular, we also process your voting behavior, insofar as you or your representative exercise your voting rights during the virtual Annual General Meeting or via electronic absentee voting by using the voting function in the InvestorPortal, to ensure orderly adoption of resolutions and proper counting of votes. Furthermore, we process information pertaining to your objections (which can be made electronically) to resolutions of the Annual General Meeting, insofar as you submit such an objection during the Annual General Meeting through the corresponding function of the InvestorPortal. In addition, we process your personal data in order to be able to satisfy our obligations to shareholders and their authorized representatives (e.g. sending an electronic confirmation of votes exercised through electronic absentee voting).

The legal basis for this processing is provided by Art. 6(1) lit. c) of the GDPR in conjunction with Section 67e(1) of the AktG and our obligations under the German Stock Corporation Act according to Sections 118 et seqq. of the AktG and in conjunction with Section 1(2) of the Act Concerning Measures Under the Law of Companies, Cooperative Societies, Associations, Foundations and Commonhold Property to Combat the Effects of the COVID-19 Pandemic (*Gesetz über Massnahmen im Gesellschafts-, Genossenschafts-, Vereins-, Stiftungs- und Wohnungseigentumsrecht zur Bekämpfung der Auswirkungen der COVID-19-Pandemie*, 'German COVID-19 Act'), where applicable.

The processing of your personal data is necessary to ensure the proper conduct of the Annual General Meeting. If you do not provide us with the required personal data, we may not be able to offer you the opportunity to make use of the InvestorPortal and/or to join the Annual General Meeting electronically.

Where applicable, we will process the name, position, and contact information of guests required for the specific form of communication (e.g. email address or postal address) to send out an invitation to the virtual Annual General Meeting and provide access to the video and audio broadcast of the virtual Annual General Meeting via a separate access channel to the InvestorPortal. The legal basis for this processing is provided by Art. 6(1) lit. f) of the GDPR. It is in our legitimate interest that the widest possible group of interested parties are informed of the virtual Annual General Meeting and, insofar as you are a representative of the media, that the conditions are in place for independent public reporting.

In conjunction with the preparation, conduct and follow-up of our virtual Annual General Meeting, we may also transfer your data to our legal advisors, tax consultants, or auditors, because we have a legitimate interest in ensuring that we hold the virtual Annual General Meeting in accordance with the applicable legal regulations and that we obtain external advice in this matter. The legal basis for this processing is provided by Art. 6(1) lit. f) of the GDPR.

d) Exercising the right to ask questions

Insofar as you exercise your right as a shareholder to submit questions through our InvestorPortal in advance of the virtual Annual General Meeting, we will also process your questions to determine whether and how these questions should be answered during the virtual Annual General Meeting. Insofar as your questions are dealt with during the virtual Annual General Meeting, your name will generally be stated in conjunction with your questions. Your name may be noted by other persons who have joined the virtual Annual General Meeting electronically. This data processing is necessary in order to safeguard our legitimate interest in ensuring that the virtual Annual General Meeting can be as similar to a physical Annual General Meeting as possible, and to serve the legitimate interests of other participants in the Annual General Meeting in learning the name of the questioner. The legal basis for this processing is provided by Art. 6(1) lit. f) of the GDPR.

e) Video messages

Insofar as you avail yourself of the opportunity to submit a video message through our InvestorPortal in advance of the virtual Annual General Meeting, we will process your personal data contained therein to determine whether your submission is in compliance with our approval criteria, and to make your video message available in the InvestorPortal, including your name. All duly registered shareholders and their proxies can take note of your video message in the InvestorPortal. This data processing is necessary in order to safeguard our legitimate interests in enabling our shareholders or their proxies to participate and make statements in a manner that most closely approximates an in-person physical event, and therefore to create an environment for the virtual Annual General Meeting that is as close as possible to that of a physical Annual General Meeting. The legal basis for this processing is provided by Art. 6(1) lit. f) of the GDPR.

f) Processing in the context of voting rights notifications

Furthermore, we process the data regarding voting rights notifications under the German Securities Trading Act (*Wertpapierhandelsgesetz*, 'WpHG') submitted to us by you or other parties required to disclose such information. The legal basis for this processing is provided by the respective statutory regulations and by Art. 6(1) lit. c) of the GDPR.

g) Processing to comply with other statutory obligations

In addition, your personal data may also be processed for the purpose of satisfying additional statutory obligations, such as regulatory requirements and retention obligations under stock corporation law, commercial law or tax law. For example, we are obligated to keep a verifiable, access-protected record of the declaration of power of attorney for three (3) years when you authorize a voting proxy appointed for the Annual General Meeting by the Company. The relevant legal basis for this processing is provided by Art. 6(1) lit. c) of the GDPR in these cases as well.

h) Cookies

Technically essential cookies are placed in the InvestorPortal to ensure a secure connection between the InvestorPortal and Q-Live (submission of questions and objections) for each session.

Cookies required for technical reasons are also used in the media gallery section (access to video messages). Cookies are small text files that are placed on your desktop computer, laptop or mobile device by a website that you visit. These allow us, for example, to recognize whether your device has ever been connected to our media gallery before. The cookies used generally do not contain any personal data. You can set your browser such that you will be informed whenever cookies are saved and only permit cookies on a case-by-case basis, restrict the acceptance of cookies to specific cases, or generally prohibit them, as well as activate the automatic deletion of cookies whenever the browser is closed. If you decide to disable cookies, you may not be able to make use of all functions of the InvestorPortal and the media gallery respectively, or functions may only be available to a limited extent.

The necessary session cookies that we place are only used for the purposes of making the InvestorPortal and the media gallery available. They are required for InvestorPortal and the media gallery functions and are deleted when you close your browser.

Article 25(2) No. 2 TTDSG is the legal basis for the placement of these essential cookies, accessing the data stored therein. Further processing of the data collected by means of essential cookies is based preponderant legitimate interest in accordance with Art. 6(1) sentence 1 lit. f) GDPR.

To the extent that we use cookies for the provision of the InvestorPortal that are not essential to the operation of the InvestorPortal, such as function cookies or performance cookies, we will only do so if you have given us your consent. In this case, we will inform you, before the cookies are placed, about our cookies and the data processing that is related to these and request your consent.

4. Where do we obtain your data?

We (or service providers we have commissioned) obtain shareholders' personal data either from the shareholders themselves or from the shareholders' depositary institutes, whom they have entrusted with the safekeeping of our shares.

If you are an authorized representative of a shareholder, we will receive your personal data from the shareholder who has given you power of attorney, and directly from you insofar as your actions in the virtual Annual General Meeting is concerned.

Insofar as you, without being a shareholder, contact us as an otherwise interested person, avail yourself of information we offer, or we provide you with information related to the virtual Annual General Meeting, we will receive the data either directly from you, from internal or external sources in context with our business activities, or in some cases from public sources, e.g. if we contact you as a representative of the media or of the authorities.

5. Who receives your data and where do we transfer it?

Your data are processed with in Vossloh AG by those employees who are involved in the organization of the Annual General Meeting.

The InvestorPortal is operated by our service provider Computershare solely on our behalf and in accordance with our instructions. The media gallery within the InvestorPortal, to which the video messages are uploaded and where they can be viewed, is also operated solely on our behalf and in accordance with our instructions by a specialist service provider.

Any companies commissioned by the Company for the purposes of preparing, conducting, or following up on the virtual Annual General Meeting will only be given such personal data by the Company that is necessary for carrying out the commissioned services, and will process this data solely on the Company's behalf and in accordance with the Company's instructions. All our own employees and all employees of external service providers who have access to personal data and/or process said personal data are obligated to treat these data confidentially.

We may also transfer your data to our legal advisors, tax consultants and/or auditors in conjunction with the preparation, conduct and follow-up of our virtual Annual General Meeting.

Insofar as a shareholder demands that items be placed on the agenda, the Company will publish these items of business including the name of the shareholder if the requirements pursuant to the provisions of the German Stock Corporation Act are met. In the same way, the Company will make shareholder motions or appointment proposals available on the Company's website along with the name of the shareholder if the requirements pursuant to the provisions of the German Stock Corporation Act are met.

Insofar as you avail yourself of the opportunity as a shareholder to submit questions, and your questions are dealt with during the Annual General Meeting, this will always be done in conjunction with your name. Your name may be noted by other persons who have joined the virtual Annual General Meeting electronically.

Insofar as you avail yourself of the opportunity to submit video messages, and your video message is published in the InvestorPortal in conjunction with your name, it will be possible for all duly registered shareholders and their authorized representatives to take note of your video message.

In accordance with Section 129(1) sentence 2 of the AktG, if you allow your voting rights to be exercised in the virtual Annual General Meeting by voting proxies appointed by the Company, we are obligated to enter you into the list of participants with your name, place of residence, number of shares, and type of shares. These data may be viewed by shareholders on request for up to two (2) years after the Annual General Meeting (Section 129(4) of the AktG).

Finally, we may also be obligated to transmit your personal data to other recipients, for instance when publishing voting rights notifications pursuant to the provisions of the German Securities Trading Act, or to the authorities in order to satisfy statutory disclosure requirements (e.g. to financial or law enforcement authorities).

Your data are generally processed in European Union (EU) or European Economic Area (EEA) member countries. To the extent that shareholders come from countries outside the EU or EEA (third countries), we will provide information to these shareholders as well (e.g. invitations to Annual General Meetings). Should such communication contain personal data (e.g. motions relating to the Annual General Meeting including the name of the submitter), this information will also be transmitted to the third country. The rules of the GDPR do not directly apply in third countries. Unless the EU Commission has adopted an adequacy decision, this may mean that the level of protection of your personal data in these third countries is lower than in the EU. However, transmission of the data is necessary to ensure that all shareholders are equally informed; we cannot exempt shareholders in third countries from our obligation to inform all shareholders. The transmission of data to third countries is thus part one of our contractual duties. The legal basis for this processing is provided by Art. 49(1) lit. b) of the GDPR.

6. How long will we retain your personal data?

We will delete or anonymize your personal data as soon as they are no longer required for the aforementioned purposes, unless statutory documentation or retention obligations (e.g. pursuant to the German Stock Corporation Act, German Commercial Code (*Handelsgesetzbuch*), German Fiscal Code (*Abgabenordnung*) or other legal provisions) mandate that we continue to store these data. In addition, we also store your data if this is required in conjunction with claims that are asserted against or by our Company, or to safeguard our legitimate interests as specified above. Please contact our Data Protection Officer if you have any specific questions regarding the duration of storage.

7. What rights do you have regarding your personal data?

Provided the legal requirements are met, as a data subject you have the right to

- obtain information on the data processing and a copy of the processed data (right of access pursuant to Article 15 of the GDPR),
- rectification of incorrect data and supplementation of incomplete data (right to rectification pursuant to Article 16 of the GDPR),
- immediate deletion of personal data (right to erasure ('right to be forgotten') pursuant to Article 17 of the GDPR),

- demand restriction of data processing (right to restriction of processing pursuant to Article 18 of the GDPR),
- as well as the right to receive the personal data you have provided to a responsible party in a structured, commonly used, and machine-readable format, and furthermore to transmit these data without hindrance from the responsible party to a different responsible party (right to data portability pursuant to Article 20 of the GDPR).

Insofar as we process your data for the purposes of safeguarding the legitimate interests of Vossloh AG or of a third party, you have the right, on grounds relating to your particular situation, to object to the processing of your personal data at any time (right to object pursuant to Article 21 of the GDPR). The data processing will then be terminated unless we are able to demonstrate compelling legitimate grounds that override your interests, rights and freedoms, or insofar as the processing serves the purposes of the establishment, exercise or defense of legal claims.

For complaints related to the processing of their personal data, data subjects can contact the Company's Data Protection Officer specified in Item 1.

Independent of this, every data subject has the right pursuant to Article 77 of the GDPR to submit a complaint to a competent data protection authority.

The competent data protection authority for our Company is:

The Federal State Commissioner for Data Protection
and Freedom of Information of North Rhine-Westphalia
P.O. Box 20 04 44
40102 Düsseldorf
Germany
Phone: +49 211 38424 - 0
Fax: +49 211 38424 - 999
Email: poststelle@ldi.nrw.de