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As the data controller within the meaning of Art. 4 No. 7 of the German Data Protection Regulation ("DSGVO"), init SE processes personal data (surname and first name, address, e-mail address, number of shares, class of shares, type of ownership of the shares and number of the voting card; if applicable, surname, first name and address of the shareholder representative appointed by the respective shareholder) on the basis of the data protection provisions applicable in Germany in order to enable shareholders and shareholder representatives to exercise their rights within the framework of the Shareholders' Meeting. init SE is represented by the members of its Managing Board.

Insofar as this personal data has not been provided by the shareholders within the scope of the registration for the shareholders' meeting, the bank holding their securities account shall transmit their personal data to init SE. The personal data of shareholders and shareholder representatives shall be processed exclusively for the purpose of handling their participation in the Shareholders' Meeting and only to the extent necessary to achieve this purpose. The legal basis for the processing is Art. 6 para. 1 lit. (c) DSGVO. init SE shall store this personal data for a period of ten years beginning with the end of the year in which the Shareholders' Meeting took place.

The service providers of init SE, which are commissioned for the purpose of organising the shareholders' meeting, shall only receive personal data from init SE that is required for the execution of the commissioned service and shall process the data exclusively in accordance with the instructions of init SE.

The personal data shall be stored for the duration of the statutory retention periods and then deleted immediately. Automated decision-making including profiling in accordance with Art. 22 DSGVO does not take place on the part of init SE at any time.

With regard to the transmission of personal data to third parties in the context of an announcement of shareholder requests for additions to the agenda as well as counter motions and election proposals by shareholders, please refer to the explanations under the item Shareholders' Rights of the Conditions of Participation.

If you, as a shareholder, make use of the possibility to submit questions in advance of the virtual Shareholders' Meeting and your questions are answered there, this will generally be done by mentioning your name. This can be noted by other participants of the virtual shareholders' meeting. This data processing is necessary to protect our legitimate interest in making the virtual Shareholders' Meeting as similar as possible to a physical meeting and the legitimate interest of the other participants in the Shareholders' Meeting in knowing the name of a questioner. The legal basis for this processing is Art. 6 para. 1

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lit. f) DSGVO. You may object to your name being mentioned for reasons arising from your particular situation.

If you visit our Shareholders' Meeting portal on the internet, we would like to draw your attention to the data protection information for shareholders and shareholder representatives stored there (only in German).

With regard to the processing of personal data, shareholders and shareholder representatives may request init SE to provide them with information on their personal data in accordance with Article 15 of the GDPR, to correct their personal data in accordance with Article 16 of the GDPR, to delete their personal data in accordance with Article 17 of the GDPR, to restrict the processing of their personal data in accordance with Article 18 of the GDPR and to transfer certain personal data to them or to a third party designated by them (right to data portability) in accordance with Article 20 of the GDPR. Shareholders and shareholder representatives may assert these rights free of charge against init SE via one of the following contact options:

init innovation in traffic systems SE  
Investor Relations  
Käppelestraße 4 - 10  
76131 Karlsruhe  
E-Mail: [ir@initse.com](mailto:ir@initse.com)

You can reach our data protection officer at:

Mr. Georg Biel  
Data Protection Officer  
E-Mail: [georg@biel-it.de](mailto:georg@biel-it.de)  
Biel-IT UG

In addition, pursuant to Art. 77 DSGVO, shareholders and shareholder representatives have a right of appeal to the data protection supervisory authority of either the (federal) state in which they are domiciled or have their permanent place of residence or the state of Baden-Württemberg in which init SE has its registered office.