

PRIVACY POLICY (EU)

Last Updated January 2021

INTRODUCTION

1. Purpose of this Privacy Policy

- 1.1. This is a Privacy Policy of Cromwell European Holdings Limited, any of its direct and indirect subsidiaries or the funds and the mandates under their management, as applicable (the "Privacy Policy").
- 1.2. We, the controller ("we", "us", as detailed in each Processing-Specific Section), are committed to protecting the privacy and security of your personal data.
- 1.3. We will comply with the following data protection principles when gathering and using personal data:
 - we will process personal data lawfully, fairly and in a transparent manner;
 - we will collect personal data for specified, explicit and legitimate purposes only, and will not process it in a way that is incompatible with those legitimate purposes;
 - we will only process the personal data that is adequate, relevant and necessary for the relevant purposes;
 - we will keep accurate and up to date personal data and take reasonable steps to ensure that inaccurate personal data is deleted or corrected without delay;
 - we will keep personal data in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the information is processed; and
 - we will take appropriate technical and organisational measures to ensure that personal data is kept secure and protected against unauthorised or unlawful processing, and against accidental loss, destruction or damage.
- 1.4. This Privacy Policy describes how we collect and use personal data concerning various categories of individuals (within each category, the "Relevant Individuals" or "you"), and sets out the personal data we receive from you and how we process it in accordance with applicable data protection legislation, including Regulation (EU) 2016/679 – The General Data Protection Regulation (the "GDPR"). When we engage in marketing activities with you, the provision of the Cromwell Privacy Policy (available [here](#)) will apply.
- 1.5. It applies to all Relevant Individuals located in the European Union (the "EU") or to whom GDPR would otherwise apply.
- 1.6. This Privacy Policy is divided into (i) a General Section, which addresses all aspects which are common to all categories of Relevant Individuals and all processing undertaken by us and (ii) Processing-Specific Sections, which address the specific details to each category, and namely:
 - 1.6.1. Current and Prospective Investors at Appendix 1;
 - 1.6.2. Tenants at Appendix 2; and
 - 1.6.3. Suppliers and Contractors at Appendix 3.
- 1.7. We reserve the right to update this Privacy Policy at any time and we will provide you with a new privacy policy if we make any substantial updates.

GENERAL SECTION

2. Your Personal Data

- 2.1 It is necessary for us to process certain personal data concerning you. Except as specifically indicated in the Processing-Specific Sections, personal data we hold and process will only be used within Cromwell European Holdings Limited, any of its direct and indirect subsidiaries or the funds and the mandates under their management.

3. How your information will be used

- 3.1 The information we hold and process in connection with this Privacy Policy will only be used for specific purposes, as detailed in the relevant Processing-Specific Section (each, within the relevant Processing-Specific Section, "Services"). If required, we will request your prior consent, which you will remain free to give and withdraw at any time.
- 3.2 If in the future we intend to process your personal data for a purpose other than that for which it was collected we will provide you with information on that purpose and any other relevant information.

4. How is your personal data collected?

- 4.1 "Personal data" relates to information that can be used to directly or indirectly identify you. Personal data also includes anonymous information that is linked to information that can be used to directly or indirectly identify you. Personal data does not include information that has been irreversibly anonymised or aggregated so that it can no longer enable us, whether in combination with other information or otherwise, to identify you.
- 4.2 For the purposes of the Services provided to Relevant Individuals covered by this Privacy Policy, we will collect the personal data either from you or from other sources, as detailed in the relevant Processing-Specific Section.
- 4.3 Unless specified in the relevant Processing-Specific Section, we do not collect any special categories of personal data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data).
- 4.4 If required, for the sole purpose of compliance with our legal undertakings pertaining to Know Your Client (KYC), Anti-Money Laundering (AML) and Combating of Financing of Terrorism (CFT), we may process personal data which may be connected to your criminal convictions and offences.

5. Legal basis for processing

- 5.1 We will only use your personal data when the law allows us to. In connection with the Services, we will rely on:
- 5.1.1 our legitimate interests (or those of a third party), where your fundamental rights do not override those interests;
 - 5.1.2 the performance of a contract;
 - 5.1.3 compliance with the law; or
 - 5.1.4 where required by law, your consent.

For more information, you may consult the At A Glance table detailed in the relevant Category-Specific Section relating to you.

- 5.2 Please note that we may process your personal data using more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us using the details set out in the “How To Contact Us” section below if you need details about the specific legal ground we are relying on to process your personal data on any given occasion.
- 5.3 We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by applicable data protection legislation.

6 How we may share your information

- 6.1 We will only share your personal data with third parties as indicated in each relevant Processing-Specific Section. All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal data in line with our policies.
- 6.2 Unless as specified in each relevant Processing-Specific Section, we do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.
- 6.3 If we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- 6.4 We may also need to share your personal data if we are under a duty to disclose such personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety of our customers, or others.

7 Retention of personal data

- 7.1 We retain data for as long as is reasonable for the original purpose for which it was collected and for furthering our legitimate interests.
- 7.2 To determine the appropriate retention period for personal data, we consider:
- 7.2.1 the amount, nature, and sensitivity of the personal data;
 - 7.2.2 the potential risk of harm from unauthorised use or disclosure of your personal data;
 - 7.2.3 the purposes for which we process your personal data and whether we can achieve those purposes through other means; and
 - 7.2.4 the applicable legal requirements.
- 7.3 For further information as to any specific retention periods that might apply to the personal data we hold about you, please contact us using the details set out in the “Contact Us” section.

8 International Data Transfers

- 8.1 The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (“EEA”). Where such a transfer occurs, we have provided appropriate safeguards including the application of approved Standard Contractual Clauses to our legal relationship with any third-party processors, and have taken all steps reasonably necessary to ensure that your data is treated securely and your rights in relation to your personal data are protected.

9 Your Rights

9.1 The GDPR, and other applicable data protection legislation gives you certain specific rights relating to your personal data which are set out below:

- (a) **Access** – you have the right to access your personal data and certain information about how and why we are processing it;
- (b) **Rectification** – you have the right to have any inaccurate or incomplete personal data rectified without undue delay;
- (c) **Erasure** – sometimes called the ‘right to be forgotten’, in certain circumstances, you have the right to have your personal data erased without undue delay;
- (d) **Restriction** - in certain circumstances, you have the right to have the processing of your personal data by Cromwell restricted;
- (e) **Data portability** - where the processing is carried out under the legal basis of your consent or the necessity to perform a contract with you, and is carried out by automated means, you have the right to receive the personal data concerning you that you have provided to us, in a structured, commonly-used and machine-readable format and the right to transmit those data to another controller without hindrance; and
- (f) **Objection** - in certain circumstances, you have the right to object to the processing of your personal data carried out by us or on our behalf.

9.2 Please note that not all these rights are absolute, and they do not apply in all circumstances. However, you are always welcome to contact us with any request relating to processing of your personal data and, even if we are not obliged by law to comply with your request, we will do everything reasonable to accommodate your wishes.

9.3 It is also important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your working relationship with us.

10 Information Security

10.1 We have implemented appropriate technical and organisational measures to ensure a level of security appropriate to the risk presented by the processing we carry out to protect the confidentiality, integrity and availability of your personal data and to protect against unauthorised or unlawful processing and accidental loss, destruction or damage. These measures include:

- **Physical safeguards**, such as locked doors and file cabinets and controlled access to our facilities.
- **Technological safeguards**, such as use of anti-virus and endpoint protection software, encryption, and monitoring of our systems and data centres to ensure compliance with our security policies.
- **Organisational safeguards**, through training and awareness programs on security and privacy, to ensure employees understand the importance and means by which they must protect personal data, as well as through privacy policies and policy standards that govern how we treat personal data.

11 Contact Us

11.1 If you would like further information on anything in this Privacy Policy, for all questions or concerns you have about your personal data, or if you would like to exercise any of your rights as a data subject, please contact GDPR Central Representative named at the top of this Privacy Policy at: 1st Floor, Unit 16, Manor Court Business Park, Scarborough, YO11 3TU or EUprivacy@cromwellpropertygroup.co.uk.

12 **Making A Complaint**

- 12.1 If you think we have not complied with the requirements of the GDPR as it applies to your personal data, please contact us using the contact information above.
- 12.2 You also have a right to lodge a complaint with any data protection supervisory authority in the EU. You can find details of all of the EU supervisory authorities here: https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm
- 12.3 The UK's supervisory authority is the ICO The Information Commissioner's Office (ICO) in the UK: casework@ico.org.uk or 0303 123 1113 / +44 1625 545 700; www.ico.org.uk.¹

¹ Please note these details are subject to change outside our control, so please check online for up-to-date contact information.

APPENDIX 1

PROCESSING-SPECIFIC SECTION

CURRENT AND PROSPECTIVE INVESTORS

1. Important Contact Information

Controller Name:	Cromwell European Holdings Limited and its direct and indirect subsidiaries as controllers and represented for the purpose of this Privacy Policy by Cromwell European Management Services Limited (including its affiliated entities and group companies)
Controller Address:	For the purpose of this Privacy Policy: 1 st Floor, Unit 16, Manor Court Business Park, Scarborough, YO11 3TU
GDPR Central Representative:	EUprivacy@cromwellpropertygroup.co.uk

2. Services Addressed by this Section

The information we hold and process in connection with you will be used for the management of actual or contemplated investment services we may provide to you in relation to property investment funds ("Services").

3. Personal Data We Will Collect and Process

For the purposes of the Services, we collect the following personal data:

- Name;
- Address;
- Email address;
- Contact details;
- Passport/ID details;
- Passport/ID copy;
- KYC/AML documentation; and
- Correspondence received by/from you.

4. How your information will be used

Your personal data will be used for the following purposes (and with your consent where required):

- Evaluation of investment opportunities;
- Relationship/ Contract Management (including communications regarding queries, complaints or feedback or carrying out any obligations arising from a contract);
- Conducting internal research to improve the way we interact and communicate with you;

- Legal proceedings (defending or initiating);
- Complying with a court order;
- Taking any action required to by law or to manage contractual risks (including KYC/AML/CFT); and
- Managing a data subject request under GDPR made by you.

5. How we may share your information

- 5.1. Personal data may also be shared with third party service providers, who will process it on behalf of the controller for the purposes set out in this processing-specific section. Such third parties include, but are not limited to, professional advisors, IT service providers, brokers, notaries, auditors and administrative providers.
- 5.2. All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal data in line with our policies.
- 5.3. We do not allow our third parties with whom we have shared your personal data to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. Your Data Protection at a Glance

Purpose	Lawful basis	Relevant Personal Information
Evaluation of investment opportunities	Cromwell's Legitimate interest: allowing Cromwell to evaluate a potential contractual relationship with you or your employer	<ul style="list-style-type: none"> - Name - Address - Email address - Contact details - KYC/AML documentation - Correspondence received by/from you
Relationship/ Contract Management (including communications regarding queries, complaints or feedback or carrying out any obligations arising from a contract)	Cromwell's Legitimate interest: allowing Cromwell to perform the contract to which it is a party with your employer or allowing Cromwell to manage customer relationship	<ul style="list-style-type: none"> - Name - Address - Email address - Contact details - KYC/AML documentation - Correspondence received by/from you
Conducting internal research to improve the way we interact and communicate with you	Cromwell's Legitimate interest: allowing Cromwell to improve client relationship	<ul style="list-style-type: none"> - Name - Address - Email address - Contact details - Correspondence received by you

Legal proceedings (defending or initiating)	Cromwell's Legitimate interest: allowing Cromwell to enforce or defend its rights	<ul style="list-style-type: none"> - Name - Address - Email address - Contact details - KYC/AML documentation - Correspondence received by you
Complying with a court order	Necessary for compliance with legal obligations	<ul style="list-style-type: none"> - Name - Address - Email address - Contact details - KYC/AML documentation - Correspondence received by you
Taking any action required to by law or to manage contractual risks (including KYC/AML/CFT)	Necessary for compliance with legal obligations	<ul style="list-style-type: none"> - Name - Address - Email address - Contact details - KYC/AML documentation - Correspondence received by you
Managing a data subject request under GDPR made by you	Necessary for compliance with legal obligations	<ul style="list-style-type: none"> - Name - Email address - Contact details - Passport/ID details - Passport/ID copy

APPENDIX 2 PROCESSING-SPECIFIC SECTION TENANTS

1. Important Contact Information

Controller Name:	The entity with whom you or your employer have entered into the lease contract with.
Controller Address:	The address of the landlord as stated in the lease contract.
GDPR Central Representative:	EUprivacy@cromwellpropertygroup.co.uk

2. Services Addressed by this Section

The information we hold and process will be used for concluding and managing the lease agreement with you as an individual tenants or with the corporate tenant whom you work for (“Services”).

3. Personal Data We Will Collect and Process

For the purposes of the Services, we collect the following personal data:

- Name;
- Email address;
- Telephone number;
- Office address;
- Business function;
- Financial and business information;
- Contact details;
- Signature;
- Passport/ID details;
- Passport/ID copy;
- Bank account details;
- Photographs;
- CCTV images; and
- Other publicly available data for compliance screening.

4. How your information will be used

Your personal data will be used for the following purposes (and with your consent where required):

- Lease agreement offer;
- Lease agreement evaluation;

- Execution of lease;
- Lease management;
- Valuation and technical surveys;
- Divestment of asset(s);
- Tenant satisfaction surveys;
- Legal proceedings (defending or initiating);
- Complying with a court order;
- Taking any action required to by law or to manage contractual risks (including KYC/AML/CFT);
- Providing security in the buildings we own;
- Managing a data subject request under GDPR made by you; and
- Taking any actions required in connection with incidents which may occur in buildings that we own.

5. How we may share your information

- 5.1. Personal data may also be shared with third party service providers, who will process it on behalf of the controller for the purposes set out in this processing-specific section. Such third parties including but are not limited to service providers (e.g. to conduct tenant satisfaction surveys), professional advisors, IT service providers, property management companies or their agents, facility management companies or their agents, local authorities, auditors, valuers, letting agents, sales brokers, building surveyors, technical advisors, utility providers, insurance providers, potential investors or any trustees of the property owning entity.
- 5.2. The controller listed in this Privacy Notice and other entities in the group of the controller and the third-party service providers listed above are required to take appropriate security measures to protect your personal data in line with our policies.
- 5.3. The controller indicated in this Privacy Notice does not allow third parties with whom it has shared your personal data to use your personal data for their own purposes. They are only permitted to process your personal data for specified purposes and in accordance with the controller's instructions.

6. Your Data Protection at a Glance

Purpose	Lawful basis	Relevant Personal Information
Lease agreement offer	Controller's legitimate interest to offer a service	<ul style="list-style-type: none"> - Name - Email address - Telephone number - Business function - Office address
Lease agreement evaluation	Controller's legitimate interest to evaluate the suitability or relevancy of an agreement.	<ul style="list-style-type: none"> - Financial and business information - Contact details - Bank account details - Other publicly available data for compliance screening

Execution of a lease	Concluding the lease	<ul style="list-style-type: none"> - Name - Email address - Telephone number - Office address - Business function - Passport/ID details - Passport/ID copy - Bank account details - Signature
Lease Management	<p>Where you are the individual tenant:</p> <p>Necessity for the performance and management of the agreement or any ancillary purpose.</p>	<ul style="list-style-type: none"> - Name - Email address - Telephone number - Office address - Business function - Passport/ID details - Passport/ID copy - Bank account details
Lease Management	<p>Where you are an employee or an individual contractor of a corporate tenant:</p> <p>Legitimate interest to perform and manage the lease or service agreement with data subject's employer</p>	<ul style="list-style-type: none"> - Name - Business email address - Business telephone number - Office address - Business function - Passport/ID details - Passport/ID copy
Valuations and technical surveys	Controller's legitimate interest to have the building properly managed, surveyed or valued.	<ul style="list-style-type: none"> - Name - Email address - Telephone number - Office address - Business function
Divestment of asset(s)	Controller's legitimate interest to divest of the asset (via data room)	<ul style="list-style-type: none"> - Name - Email address - Telephone number - Office address - Business function - Passport/ID details - Passport/ID copy - Bank account details (for individual tenants)
Tenant satisfaction surveys	Controller's legitimate interest to keep its customers satisfied and to continuously improve the quality of services	<ul style="list-style-type: none"> - Name - Email address - Telephone number - Office address - Business function

Legal proceedings (defending or initiating)	Allowing the controller to enforce or defend its rights	<ul style="list-style-type: none"> - Name - Email address - Telephone number - Office address - Business function - Bank details
Complying with a court order	Necessary for compliance with legal obligations	Any data that is processed by the controller and required by law
Taking any action required to by law or to manage contractual risks (including KYC/AML/CFT)	Necessary for compliance with legal obligations	<ul style="list-style-type: none"> - Name - Email address - Telephone number - Office address - Business function - Passport/ID details - Passport/ID copy - Bank account details - Other publicly available data for compliance screening
Providing security in the buildings we own	Legitimate interest of the controller to manage the properties	<ul style="list-style-type: none"> - Name - Email address - Contact details - Passport/ID details - Passport/ID copy - Photograph (where required) - CCTV images
Managing a data subject request under GDPR made by you	Necessary for compliance with legal obligations	<ul style="list-style-type: none"> - Name - Email address - Contact details - Passport/ID details - Passport/ID copy
Taking any actions required in connection with incidents which may occur in buildings that we own	Necessary for compliance with legal obligations or legitimate interest to maintain the building	<ul style="list-style-type: none"> - Name - Email address - Contact details - Passport/ID details - Passport/ID copy

APPENDIX 3

PROCESSING-SPECIFIC SECTION

SUPPLIERS AND CONTRACTORS

1. Important Contact Information

Controller Name:	The entity with whom you or your employer have entered into the relevant contract with.
Controller Address:	The address of the counterparty as stated in the relevant contract.
GDPR Central Representative:	EUprivacy@cromwellpropertygroup.co.uk

2. Services Addressed by this Section

The information we hold and process will be used for the management of the service agreement with you as an individual contractors and the corporate supplier whom you work for ("Services").

3. Personal Data We Will Collect and Process

For the purposes of the Services, we collect the following personal data:

- Name,
- Email address;
- Telephone number;
- Office address;
- Financial and business information;
- Contact details;
- Business function;
- Passport/ID details;
- Passport/ID copy;
- Bank account details;
- Photographs;
- CCTV images; and
- Other publicly available data for compliance screening.

4. How your information will be used

As the case may be, with your consent where required by law, we will use it in connection with:

- Service agreement offer;
- Service agreement evaluation;

- Execution of a service agreement;
- Contract management;
- Divestment of asset(s);
- Legal proceedings (defending or initiating);
- Complying with a court order;
- Taking any action required to by law or to manage contractual risks (including KYC/AML/CFT);
- Providing security in the buildings we manage;
- Managing a data subject request under GDPR made by you; and
- Taking any actions required in connection with incidents which may occur in buildings that we manage or own .

5. How we may share your information

5.1 Personal data may also be shared with third party service providers, who will process it on behalf of Cromwell for the purposes set out in this processing-specific section. Such third parties include, but are not limited to professional advisors, IT service providers, property management companies or their agents, facility management companies or their agents, auditors or valuers, sales brokers, building surveyors, technical advisors, insurance providers, potential investors, any trustees of the property-owning entity or tenants of the building we manage.

5.2 The controller and other entities in the group of the controller and the third-party service providers listed in this Privacy Notice are required to take appropriate security measures to protect your personal data in line with our policies.

5.3 The controller indicated in this Privacy Notice does not allow the third parties with whom it has shared your personal data to use your personal data for their own purposes. They are only permitted to process your personal data for specified purposes and in accordance with the Controller's instructions.

6. Your Data Protection at a Glance

Purpose	Lawful basis	Relevant Personal Information
Service agreement offer	Controller's legitimate interest to offer a service	<ul style="list-style-type: none"> - Name - Email address - Telephone number - Business function - Office address
Service agreement evaluation	Controller's legitimate interest to evaluate the suitability or relevancy of an agreement	<ul style="list-style-type: none"> - Contact details - Bank account details, - Other publicly available data for compliance screening - Financial and business information
Execution of a service agreement	Concluding the service agreement	<ul style="list-style-type: none"> - Name - Email address - Telephone number - Office address

	and contract performance	<ul style="list-style-type: none"> - Business function - Passport/ID details - Passport/ID copy - Bank account details
Contract Management	<p>Where you are the individual service supplier:</p> <p>Necessity for the performance and management of the agreement or any ancillary purpose</p>	<ul style="list-style-type: none"> - Name - Email address - Telephone number - Office address - Business function - Passport/ID details - Passport/ID copy - Bank account details
Contract management	<p>Where you are an employee or an individual contractor of a corporate service supplier:</p> <p>Legitimate interest to perform and manage the lease or service agreement with data subject's employer</p>	<ul style="list-style-type: none"> - Name - Email address - Telephone number - Office address - Business function - Passport/ID details - Passport/ID copy
Divestment of asset(s)	<p>Controller's legitimate interest to divest of the asset(s) (via data room)</p>	<ul style="list-style-type: none"> - Name - Email address - Telephone number - Office address - Business function - Passport/ID details - Passport/ID copy - Bank account details (for individual tenants)
Legal proceedings (defending or initiating)	<p>Allowing the controller to enforce or defend its rights</p>	<ul style="list-style-type: none"> - Name - Email address - Telephone number - Office address - Business function - Bank account details
Complying with a court order	<p>Necessary for compliance with legal obligations</p>	<p>Any data that is processed by the controller and required by law</p>

<p>Taking any action required to by law or to manage contractual risks (including KYC/AML/CFT)</p>	<p>Necessary for compliance with legal obligation</p>	<ul style="list-style-type: none"> - Name - Email address - Telephone number - Office address - Business function - Passport/ID details - Passport/ID copy - Bank account details - Other publicly available data for compliance screening
<p>Providing security in the buildings we manage or own</p>	<p>Legitimate interest of the controller to manage the properties</p>	<ul style="list-style-type: none"> - Name - Email address - Contact details - Passport/ID details - Passport/ID copy - Photographs (where required) - CCTV images
<p>Managing a data subject request under GDPR made by you</p>	<p>Necessary for compliance with legal obligations</p>	<ul style="list-style-type: none"> - Name - Email address - Contact details - Passport/ID details - Passport/ID copy
<p>Taking any actions required in connection with incidents which may occur in buildings that we manage or own</p>	<p>Necessary for compliance with legal obligations or legitimate interest to maintain the building</p>	<ul style="list-style-type: none"> - Name - Email address - Contact details - Passport/ID details - Passport/ID copy