

REDEVCO CUSTOMER PRIVACY POLICY – MAY 2018

PRIVACY STATEMENT RELATING TO REDEVCO'S CUSTOMER DATA PROCESSING

Redevco BV and its affiliates (hereafter: '**Redevco**', '**we**', '**us**', '**our**') collect and process data relating to its business relations, including tenants, suppliers, external investors, (potential) buyers and sellers and other contacts (hereafter each class of persons is together referred to as: '**I**', '**me**', '**you**'). Redevco is responsible for the processing of your data as described below and therefore is the data controller. Redevco respects your privacy. For this reason and based on current legislation (GDPR), Redevco has implemented a high standard of data protection, which complies with applicable law. With this privacy statement, Redevco aims to inform you about the processing of your personal data. Redevco urges you to read this statement and familiarise yourself with its content. This privacy statement may change from time to time and we advise you to regularly check our website to find the most recent version of the applicable privacy statement.

1. Which categories of personal data does Redevco collect and/or process about me?

Redevco processes personal data of its tenants, suppliers, external investors, (potential) buyers and sellers and other contacts, as describe below (hereafter together referred to as: '**Customer data**'). If you fall under one of these categories of persons, please find below more information on Redevco's processing of such data.

Redevco may have received the data mentioned below from sources other than directly from you, i.e. by obtaining information from a compliance tool (such as Compliance Catalyst), the local Chamber of Commerce or in connection with the performance of other legal checks to prevent corruption, identity theft, financial fraud, money laundering and/or terrorist financing (KYC).

I am a tenant or potential tenant...

Redevco collects and processes data relating to persons working at the legal entities who rent properties from or through business relations of Redevco. Redevco may process the following categories of data about you:

- Personal information, including name, gender, date of birth and place of birth;
- Contact information, including address, postal code, place of residence, telephone number and email address;
- Business information/legal entities/job titles, signatures;
- Bank account(s) of the Tenant;
- Background information (PEP and sanction information);
- Data provided by you directly;
- Data whose processing is required pursuant to, or necessary with a view to the application of legislation.

I am a supplier or potential supplier...

Redevco may process your personal data if you represent a company that delivers services to Redevco. Redevco may collect and/or process the following categories of data about you:

- Personal information, including name, gender, date of birth and place of birth;

- Contact information, including address, postal code, place of residence, telephone number and email address;
- Data with respect to the reputation of (the representatives of) the company e.g. fraud, money laundering etc.;
- Business information/legal entities/job titles, signatures;
- Background information (PEP and sanction information);
- Bank account(s) of the company;
- Data provided by you directly;
- Data whose processing is required pursuant to, or necessary with a view to the application of legislation.

I am a buyer or seller (or a potential buyer or seller) ...

Redevco collects and processes data relating to persons who work at legal entities that (potentially) buy or sell any properties from, with or via Redevco. Redevco may process the following data categories from this class of persons:

- Personal information, including name, gender, date of birth, place of birth and photo;
- Contact information, including address, postal code, place of residence, telephone number and email address;
- Business information/legal entities/job titles, signatures;
- Background information (PEP and sanction information);
- Bank account(s) of the legal entities;
- Data provided by you directly;
- Data whose processing is required pursuant to, or necessary with a view to the application of legislation.

I am an external investor (or potential external investor) ...

Redevco may process your data if you act as of on behalf of external investor in relation to Redevco. Redevco may process the following data categories:

- Personal information, including name, gender, date of birth, place of birth;
- Contact information, including address, postal code, place of residence, telephone number and email address;
- Bank account(s) of the external investor;
- Business information/legal entities/job titles, signatures;
- Background information (PEP and sanction information);
- Data provided by you directly;
- Contracts;
- Data whose processing is required pursuant to, or necessary with a view to the application of legislation.

I am a job applicant...

Redevco collects and processes data relating to persons who applied to work at Redevco (applicants). Redevco may process the following categories of data from applicants:

- Personal information, including name, gender, date of birth, place of birth and photo;
- Contact information, including address, postal code, place of residence, telephone number and email address;
- Data regarding (to be) followed educational programs, courses or internships;
- Data regarding the position applied for;
- Data regarding the nature and content of the current position, as well as regarding the ending thereof;
- Data regarding the nature and content of previous positions, as well as regarding the ending thereof;
- Data whose processing is required pursuant to, or necessary with a view to the application of legislation;
- Other (relevant) data provided by the applicant.

Redevco may have received your data from other sources besides directly from you, i.e. via recruiters or head hunters.

I am a person not mentioned in any category above...

Redevco may process your data if you act as contact with Redevco (e.g. for CRM or PR applications). Redevco may process the following data categories:

- Personal information, including name, gender, date of birth, place of birth;
- Contact information, including address, postal code, place of residence, telephone number and email address;
- Business information/ job titles.

Please note that the data as described below may not be all data Redevco collect or processes about you. To find out more information about Redevco’s HR data processing, please consult the related privacy statement.

2. For what purpose does Redevco process my Customer data?

Redevco collects and processes Customer data described above for multiple purposes, which can be subdivided as follows:

No.	Purpose	One of the following legal bases
1	Rent and lease management	<ul style="list-style-type: none"> ▪ Legitimate interest of Redevco: i.e. to conduct core business activities ▪ Necessary to fulfil a legal requirement;

		<ul style="list-style-type: none"> ▪ Necessary for the performance of a contract / pre-contractual arrangements.
2	Maintenance and (re)development management	<ul style="list-style-type: none"> ▪ Legitimate interest of Redevco: i.e. to conduct core business activities; ▪ Necessary to fulfil a legal requirement; ▪ Necessary for the performance of a contract / pre-contractual arrangements.
3	Fund set up and liquidation	<ul style="list-style-type: none"> ▪ Legitimate interest of Redevco: i.e. to conduct core business activities; ▪ Necessary to fulfil a legal requirement; ▪ Necessary for the performance of a contract / pre-contractual arrangements.
4	Acquisition and divestment management	<ul style="list-style-type: none"> ▪ Legitimate interest of Redevco: i.e. to conduct core business activities; ▪ Necessary to fulfil a legal requirement; ▪ Necessary for the performance of a contract / pre-contractual arrangements.
5	Financial and management reporting	<ul style="list-style-type: none"> ▪ Legitimate interest of Redevco: i.e. to conduct core business activities; ▪ Necessary to fulfil a legal requirement; ▪ Necessary for the performance of a contract / pre-contractual arrangements.
6	Corporate Responsibility Reporting	<ul style="list-style-type: none"> ▪ Legitimate interest of Redevco: i.e. to conduct core business activities; ▪ Necessary to fulfil a legal requirement; ▪ Necessary for the performance of a contract / pre-contractual arrangements.
7	Interfacing (data export between systems)	<ul style="list-style-type: none"> ▪ Legitimate interest of Redevco: i.e. to facilitate regular business activities; ▪ Necessary to fulfil a legal requirement; ▪ Necessary for the performance of a contract / pre-contractual arrangements.
8	PR and Corporate communications	<ul style="list-style-type: none"> ▪ Legitimate interest of Redevco: i.e. to facilitate regular business activities; ▪ Necessary to fulfil a legal requirement;

		<ul style="list-style-type: none"> Necessary for the performance of a contract / pre-contractual arrangements.
9	The management and administration of job applicants	<ul style="list-style-type: none"> Legitimate interest of Redevco: i.e. to conduct regular business activities, such as being informed of, evaluating and improving the performance of Redevco and/or persons working for or on behalf of Redevco.
10	Valuations	<ul style="list-style-type: none"> Legitimate interest of Redevco: i.e. to facilitate regular business activities; Necessary to fulfil a legal requirement; Necessary for the performance of a contract / pre-contractual arrangements.
11	Treasury	<ul style="list-style-type: none"> Legitimate interest of Redevco: i.e. to facilitate regular business activities; Necessary to fulfil a legal requirement; Necessary for the performance of a contract / pre-contractual arrangements.
12	Tax	<ul style="list-style-type: none"> Legitimate interest of Redevco: i.e. to conduct regular business activities Necessary to fulfil a legal requirement
13	Purchasing	<ul style="list-style-type: none"> Legitimate interest of Redevco: i.e. to conduct core business activities; Necessary to fulfil a legal requirement; Necessary for the performance of a contract / pre-contractual arrangements.

Please be aware that the processing of the data categories for the purposes, as mentioned above, are based on one of the legal bases mentioned (depending upon the specific data category and sub purpose at stake), and not all legal bases simultaneously.

3. Who may receive my data?

Redevco works together with its trusted partners to enable the collection and processing of Customer data. Please find below a schedule with the (types of) partners we work with:

Type of recipient
Provider of an accountancy programme

Provider of an e-mail service
Provider of financial administration
Provider of administration software
CRM provider
Provider of data sharing tool
Provider of KYC-system
Provider of valuation tool to assess deal proposals and perform property valuations
Provider of real estate planning tool

4. Does Redevco protect my Customer data based on a high standard of data protection in the event it is transferred outside the EU?

Redevco processes and stores Customer data in the EU and/or Switzerland. However, there are situations in which data may be transferred to another country. For example: if your data is stored in an IT-system hosted by a trusted third party and this third party is situated in another country such as the United States, your data may be transferred to such country to enable Redevco’s trusted partners to provide us/you with their (helpdesk) services. In the event Redevco needs to transfer your data outside the EU and/or Switzerland, Redevco will take the appropriate measures to ensure your data is still protected set to the high standards as required under EU law.

Currently, your data may be transferred to the following countries:

Country outside the EU	Safety guarantees for your privacy
Switzerland	Adequacy decision of the European Commission, see here (Article 1).
United States	US-E.U. Privacy Shield / Binding Corporate Rules / EU Model Contractual Clauses

You may access our safety guarantees by sending your request by e-mail or post to:

grc@redevco.com

Redevco B.V.

attn. Compliance Officer

Wibautstraat 224

1097 DN Amsterdam

5. How long will my Customer data be stored?

Customer data will be stored as long as necessary for the purpose for which the data is collected and processed. To determine the data retention period at stake, Redevco uses the following criteria:

- Redevco complies with legal requirements imposed on Redevco under applicable law to record and store data for a certain minimum period, e.g. financial data for tax purposes.
- Redevco takes data retention periods, as suggested by local regulators, into account. This means – unless the law requires such data to be stored for a longer period – that customer data will be stored in most cases no longer than two years after the end of the transaction.

6. Which rights do I have regarding my Customer data Redevco processes?

You have the right to request Redevco to have access to your data. In certain circumstances, you have a right to rectify or delete your data, to block the data processing (e.g. if the data processing is no longer necessary for Redevco's purposes), to object to the data processing (e.g. with regards to direct marketing and if you no longer wish to receive any direct marketing information from Redevco) and to invoke your right to data portability (e.g. if our data processing is based on your consent). You can invoke your rights by contacting Redevco's Compliance Officer: grc@redevco.com

If you feel we have not appropriately dealt with your complaint, you may also submit a complaint at a local data protection authority.

7. Who can I contact about my data?

If you have a question or would like to submit a complaint with regards to the collection and processing of your data by Redevco, you can contact Redevco's Compliance Officer: grc@redevco.com