

## GENERAL PRIVACY POLICY

At Atrium European Real Estate Limited (“**Atrium**”) we take the protection of your personal data serious, and will use our best efforts to ensure that it is processed in accordance with the requirements set out in the General Data Protection Regulation (EU) 2016/679 (“**GDPR**”)

This Atrium privacy policy explains what personal data we collect from you, how we process it, and what rights you have. It covers personal data of individuals with whom we engage in the course of our business interactions.

Atrium European Real Estate Limited. (registered at St. Helier, Jersey, JE4 0QH Channel Islands) is the data controller responsible for the processing of personal data described in this privacy policy.

This privacy notice informs you about how we look after your personal information and tells you about your rights with regards to privacy and the protection of the law. [*Please use the following table contents to click to the specific area of interest*].

- I. Important Information;
- II. Data Protection Principles;
- III. Personal Data that we retain about you, its purpose and the legal basis for processing;
  - a. Visitors to this website ([www.aere.com](http://www.aere.com));
  - b. Visitors to our offices;
  - c. Our business contacts;
  - d. Suppliers and professional advisors;
  - e. Parties we do business with ((potential) clients, counterparties or visitors);
  - f. Atrium’s investors;
- IV. Data Sharing;
- V. Data Security;
- VI. Data Retention;
- VII. Your Rights in relation to Your Personal Information;

### 1. Important Information;

Atrium respects your privacy and is committed to protecting your personal information. In accordance with the General Data Protection Regulation (GDPR) Our privacy notice details how we collect and use your personal information both during and after our relationship ends. This policy applies to Atrium’s business contacts, suppliers and professional advisors, investors and their associated individuals and generally all parties with whom Atrium has business dealings (including, but not limited to (potential) clients, counterparties,

customers and tenants). [www.aere.com](http://www.aere.com) is not intended for minors and we do not knowingly collect data related to minors. The Atrium Group is made up of different legal entities established under the laws of various jurisdictions (details can be found in the latest Financial Statements of Atrium European Real Estate Limited at <https://www.aere.com/financialresults.aspx>).

This privacy notice is issued by Atrium European Real Estate Limited on behalf of the Atrium Group so when we mention "Atrium", "we", "us" or "our" in this notice, we are referring to the relevant legal entity in the Group responsible for the processing of your personal data. Atrium European Real Estate Limited is responsible for this website. For the purposes of the GDPR, and for European Union ("EU") subjects to whom GDPR applies the Atrium company that you have dealings with is the controller of your personal information. This tells you that we are responsible for deciding how we hold, use and process personal information about you. Under the GDPR we are required to notify you of the information that is contained in this privacy notice.

The office of the Group Head of Legal & Compliance in conjunction with the Data Protection Officer is responsible for overseeing all questions in relation to this Privacy Notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the Group Head of Legal & Compliance or your local Data Protection Officer by e-mail using the e-mails below. You have the right to make a complaint at any time to the data protection authority in your country. We would, however, appreciate the chance to deal with your concerns before you approach the data protection authority, so please contact us in the first instance.

This notice applies to Atrium's business contacts, customers, suppliers and professional advisors, parties with whom Atrium conducts business (including (potential) clients, customers or counterparties) and investors and any associated individuals. This notice is not a part of any contract of services.

It is very important that this notice is read with any other privacy notice that may be provided to you by Atrium on specific occasions when we are collecting or processing personal information about you, so that you remain aware of how and why we are using such information. Atrium reserves the right to update this privacy notice at any time. Atrium may also notify you in other ways from time to time about the processing of your personal information.

## 2. Data Protection Principles

We will comply with applicable data protection legislation. This legislation dictates that the personal information we hold must be:

1. used lawfully, fairly and in a transparent way;

2. collected only for valid purposes that we have explained to you and not used in any way that is incompatible with those purposes;
  3. relevant for the purposes that we have informed you about and limited only to those purposes;
  4. accurate and to the extent appropriate, kept up to date;
  5. kept only as long as necessary for the purposes we have told you about or as is legally required; and,
  6. processed and kept securely.
3. Personal Information we hold about you, purposes and lawful basis for processing

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are more sensitive types of personal data which require a higher level of protection, known as 'special categories' of personal data under the GDPR. We do not collect "special categories" of personal data. Nor do we collect any information about criminal convictions and offences unless revealed by due diligence conducted to comply with a legal obligation or given to us in connection with our role, or potential role, as investor in connection with a transaction, in order to comply with a legal obligation.

Please click on the relevant section to see the categories of personal information about you that we collect, store, and use, and the purposes of processing.

The legal basis for collecting, using and storing personal information about the categories of individuals below is that such processing is necessary for our legitimate interests in running and promoting our business.

- a. [Visitors to Atrium's website](#);

When you visit our website the server will record your IP address together with the date, time and duration of your visit. An IP address is an assigned number, similar to a telephone number, which allows your computer to communicate over the Internet. In addition to your IP address the following technical information will also be collected: browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, information about your visit including the full Uniform Resource Locators (URL), clickstream to, through and from the website (including date and time), pages viewed, download errors, page interaction information (such as scrolling

clicks) and methods used to browse away from the website. You are not required to provide any personal information to access public areas of our website.

b. [Visitors to Atrium's offices;](#)

When you visit our offices or assets in Europe, we collect the following personal information about you for the following purposes:

1. images (but not sound or facial recognition) of you in public areas from CCTV footage in line with our legitimate interests (security of the building);
2. contact information by completion of the visitor guest list in line with our legitimate interests (security of the building);
3. if applicable, health information by completion of the first aid accident book in order to comply with legal obligations (health and safety); and
4. names and dietary preferences for catering purposes in meetings in line with our legitimate interests (respecting visitors' needs).

c. [Our business contacts](#)

If you have had contact with Atrium, for example through emailing us or meeting a representative of Atrium, Atrium collects, uses and stores limited amounts of personal information relating to you, such as your name, job title, employer organisation and contact details. Atrium also uses publicly available information about you or information you have provided us with to add to Atrium's contact database. Atrium will collect and store this personal information for the purposes of:

1. maintaining a record of contacts;
2. providing periodic business updates as described below;
3. organising meetings between you and your Atrium contacts; and
4. sending you periodic updates about Atrium's business, activities and opportunities, in particular, by email; you can opt out of receiving updates at any by asking your Atrium business contact to remove you from updates.

We will share the personal information we hold about business contacts with:

- a) companies which process personal information on Atrium's behalf;
- b) professional advisors, such as accountants, lawyers or other consultants;
- c) other companies in the Atrium Group, including those outside the European Union;
- d) Atrium's auditors; and
- e) applicable regulators and other governmental agencies anywhere in the world.

d. Our suppliers and professional advisers

If you are an individual associated with a supplier to Atrium, or with one of our professional advisers, Atrium will collect, use and store limited amounts of personal information relating to you, including but not limited to your name, job title, qualifications, employer or parent organisation and contact details. Atrium will collect, use and store this personal information for the purposes of administering and maintaining records of services or advice we have received, and commissioning further services. The personal information Atrium holds about individuals associated with our suppliers and professional advisers will be shared with:

- a) companies which process personal information on Atrium's behalf;
- b) professional advisers, such as accountants, lawyers or other consultants;
- c) other companies in the Atrium Group, including those outside the European Union;
- d) Atrium's auditors; and
- e) applicable regulators and other governmental agencies anywhere in the world.

e. Parties with whom we conduct business (including (potential) clients, counterparties);

If you are involved in a transaction or potential transaction that Atrium is a party to, Atrium collects, uses and stores personal information relating to you. To the extent appropriate, this includes your business and personal contact details, interest/marketing preferences, professional opinions and judgements, visual images and photographs required for business purposes, log-in details for user accounts in our systems, information relating to your financial status and dealings, nationality information (including copies of identity documents, such as a passport, if permitted by law in appropriate jurisdictions), references provided by third parties, and results of other due diligence investigations carried out.

We collect, process and store this personal information for the purposes of:

- i. conducting "know-your customer" and other due diligence pursuant to applicable anti-money laundering and anti-corruption laws and regulations and Atrium's related policies and procedures;
- ii. assessing your suitability as our counterparty or client, including by verifying your identity;
- iii. advising on potential transactions and transactions;
- iv. administering any transaction that we enter into;
- v. providing a range of financial services;
- vi. statistical analysis and market research;
- vii. maintaining records of investments;

- viii. billing and invoicing purposes;
- ix. complying with our regulatory and legal obligations, including assessing and managing risk;
- x. identifying and preventing fraud and other unlawful activity;
- xi. safeguarding Atrium's legal rights and interests;
- xii. seeking and receiving advice from our professional advisors, including accountants, lawyers and other consultants;
- xiii. organising and holding meetings and events; and
- xiv. sending you periodic updates about Atrium's business, activities and opportunities, in particular, by email; you can opt out of receiving updates at any time by asking your Atrium contact to remove you from such updates. The personal information we collect, use and store about individuals associated with our clients, counterparties and potential clients and counterparties with whom we conduct business may be shared with:
  - a) companies which process personal information on a Client's behalf;
  - b) credit rating agencies;
  - c) financial intermediaries;
  - d) professional advisors, such as accountants, lawyers or other consultants;
  - e) other persons who have an interest or involvement in, or who are considering an interest or involvement in, a transaction in which Atrium is a (potential) party, including co-investors, other providers of finance and investors in Atrium;
  - f) other companies in the Atrium group in the United States;
  - g) Atrium's auditors; and
  - h) applicable regulators and other governmental agencies anywhere in the world.

As discussed above, our legal basis for collecting, using and storing personal information about you is that such processing is necessary for our legitimate interests in running our business. If we are involved in a potential transaction that you consider becoming a party to, it will also be necessary for us to process your personal information in connection with the relevant contract and to comply with our regulatory and legal obligations.

f. [Our investors;](#)

We collect, use and store personal information about our investors for the purposes of:

- i. complying with our regulatory and legal obligations;
- ii. communicating with our investors (including the mailing, in physical or electronic format, of Annual Reports, AGM or EGM notices or proxy cards, or communications in relation to other corporate actions);

- iii. facilitating the payment of dividends; and
- iv. sending you periodic updates about Atrium's business, activities and opportunities, in particular, by email; you can opt out of receiving updates at any time by asking your Atrium contact to remove you from such updates.

We share the personal information we hold about our investors with:

1. companies which process personal information on Atrium's behalf;
2. professional advisors, such as accountants, lawyers, proxy advisers or other consultants;
3. other companies in the Atrium group in the United States;
4. Atrium's auditors; and
5. applicable regulators and other governmental agencies anywhere in the world.

As discussed above, our legal basis for collecting and storing personal information about our investors is that such processing is necessary for our legitimate interests in running and operating our business, and ensuring effective communications with our investors.

#### [Lawful basis for using your personal information](#)

Atrium will only use your personal data when the law allows it. Most commonly, Atrium will use your personal data in the following circumstances (each a lawful basis):

1. where Atrium needs to perform the contract it is about to enter into or has entered into with you;
2. where it is necessary for Atrium's legitimate interests (as further explained above) and your interests and fundamental rights do not override those interests; or
3. where Atrium needs to comply with a legal or regulatory obligation.

Generally, Atrium does not rely on consent as a legal basis for processing your personal data.

#### [If you fail to provide personal information?](#)

If you do not provide certain information when requested, Atrium may not be able to perform the contract it has entered into with you (such a particular transaction), or Atrium may be prevented from complying with its legal obligations (such as to perform client due diligence).

## Change of purpose

Atrium will only use your personal information for the purposes for which it collected it, unless Atrium reasonably considers that it needs to be used for another reason and that reason is compatible with the original purpose. If Atrium needs to use your personal information for an unrelated purpose, Atrium will notify you and we will explain the legal basis which allows us to do so. Please note that Atrium may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 4. Data Sharing

Atrium shares your personal information with third parties only as necessary, including third-party service providers and other entities in the Atrium Group. Atrium requires third parties to respect the security of your personal information and to treat it in accordance with the law. Atrium can – occasionally – transfer your personal information outside the European Economic Area and when it does, you can expect a similar degree of protection in respect of your personal information.

### Why do we share your personal information with third parties?

Atrium will share your personal information with third parties where required by law, where it is necessary to administer Atrium's relationship with you or where Atrium has another legitimate interest in doing so. "Third parties" includes third-party service providers (including contractors) and other entities within the Atrium group worldwide. When do we share your personal information with other entities in the Atrium group?

We will share your personal information with other companies in the Atrium Group for internal administrative, compliance or legal purposes.

### Which third-party service providers use your personal information?

The following activities are carried out by the following categories of third-party service providers in the following locations:

1. Telephone and video conferencing, including outside the European Union;
2. Recording telephone calls and emails for compliance purposes;

3. Contact database management;
4. Hosting and/or participating in data rooms by various providers, potentially including in the United States and India;
5. Marketing communications, including by Atrium Group outside of the European Union; and
6. Communication, including in the United States and India;

[How secure is your personal information with third-party service providers and other entities in our group?](#)

All of Atrium's third-party service providers and other companies in the Atrium Group are required to take appropriate security measures to protect your personal information in line with the GDPR. Except where needed for their own direct relationship with you, Atrium does not allow its third-party service providers to use your personal data for their own purposes. Atrium only permits them to process your personal data for specified purposes and in accordance with our instructions.

Atrium may share your personal information with other third parties, for example in the context of the possible sale or restructuring of its business. If needed to comply with law and regulations, Atrium will also need to share your personal information with a regulator, governmental agency or otherwise.

[Transferring your personal information outside Europe](#)

We share your personal data within the Atrium Group. This will involve transferring your data outside the European Economic Area (EEA). Some of Atrium's our third-party service providers are based outside the EEA so their processing of your personal data will involve a transfer of data outside the EEA. Whenever Atrium transfers your personal data out of the EEA, Atrium ensures a similar degree of protection is afforded to it by implementing at least one of the following safeguards:

- a) The transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries.
- b) The use of specific contracts approved by the European Commission which give personal information the same protection it has in the European Union. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.
- c) Where Atrium uses third-party service providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide

similar protection to personal data shared between the Europe and the US. For further details, see European Commission: EU-US Privacy Shield.

Please contact Atrium if you would like further information on the specific mechanism used by Atrium when transferring your personal data out of the European Union.

## 5. [Data Security](#)

Atrium has put in place appropriate measures to protect the security of your personal information. Third parties will only process your personal information where they have agreed to treat the personal information confidentially and to keep it secure. Atrium has put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, Atrium limits access to your personal information to those employees, agents, contractors and other third parties who have a business need to access it. They will only process your personal information on Atrium's instructions and they are subject to a duty of confidentiality. Atrium has put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

## 6. [Data Retention](#)

How long will you use my information for? Atrium will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, Atrium considers the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which Atrium processes your personal data and whether Atrium can achieve those purposes through other means, and the applicable legal requirements. In some circumstances Atrium may anonymise your personal information so that it can no longer be associated with you, in which case Atrium may use such information without further notice to you. Once you are no longer a business contact, supplier, professional advisor, counterparty with whom Atrium conducts business (including client) or an investor of Atrium we will retain and securely destroy your personal information in accordance with our data retention policy.

## YOUR RIGHTS IN RELATION TO YOUR PERSONAL INFORMATION

[Your duty to inform us of changes](#)

It is important that the personal information Atrium holds about you is accurate and current. Please keep Atrium informed if your personal information changes during your relationship with Atrium.

#### [Your rights in connection with your personal information](#)

Under certain circumstances, under the GDPR you have the right to:

- ✓ Request access to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information Atrium holds about you and to check that Atrium is lawfully processing it.
- ✓ Request correction of the personal information that Atrium holds about you. This enables you to have any incomplete or inaccurate information Atrium holds about you corrected.
- ✓ Request erasure of your personal information. This enables you to ask Atrium to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- ✓ Object to processing of your personal information where Atrium is relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where Atrium is processing your personal information for direct marketing purposes.
- ✓ Request the restriction of processing of your personal information. This enables you to ask Atrium to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- ✓ Request the transfer of your personal information to another party.
- ✓ In the limited circumstances where you may have provided your consent to the processing of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. Once Atrium has received notification that you have withdrawn your consent, Atrium will no longer process your information for the purpose or purposes you originally agreed to, unless Atrium has another legitimate basis for doing so in law.

#### [How can I exercise any of my rights?](#)

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, request that Atrium transfers a copy of your personal information to another party, or withdraw consent, please contact us at [dpo@aere.com](mailto:dpo@aere.com).

[Is there any fee that I would need to pay?](#)

No fee usually required. You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, Atrium may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, Atrium may refuse to comply with the request in such circumstances.

[What Atrium may need from you](#)

If you want to exercise any of those rights, Atrium may request specific information from you to help Atrium confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

[Your right to withdraw consent](#)

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact Atrium. Once Atrium has received notification that you have withdrawn your consent, Atrium will no longer process your information for the purpose or purposes you originally agreed to, unless Atrium has another legitimate basis for doing so in law.