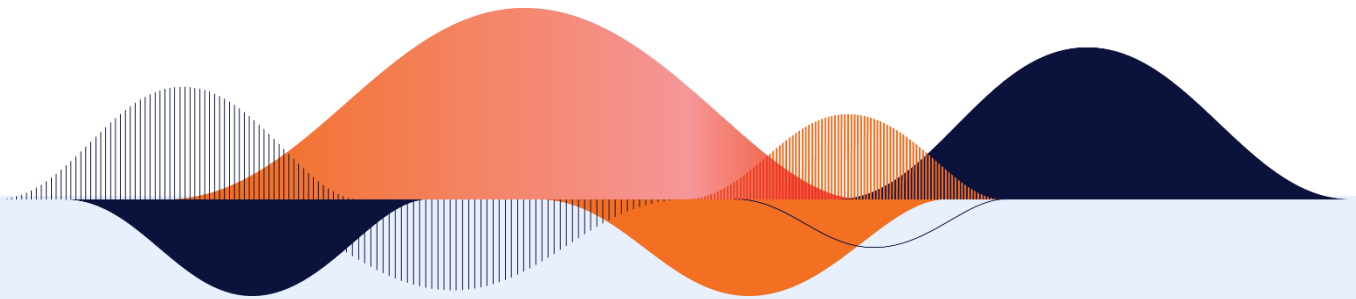


# Privacy Policy



## 1. Introduction

Savills IM undertakes to protect your personal privacy and our processing of your personal information is governed by this Privacy Policy. “Savills Investment Management”, “Savills IM”, “our” and “we” each mean all of the companies in the Savills IM group including but not limited to Savills Investment Management LLP and its respective subsidiaries) which collect and use your information in the manner set out in this Privacy Notice.

Any reference to “you” or “your” refers to anyone whose personal information we process.

References to “you”, “your” or “you’re” refer to all our personal data processed by us. Our processing of your personal information will be governed by this Privacy Policy. Savills IM is personally responsible for the personal data collected and processed by you. We will process your personal information subject to confidentiality and in accordance with applicable data protection laws and your personal information will only be shared with other parties in accordance with this Privacy Policy.

This Privacy Policy explains:

1. What constitutes personal data
2. How we collect your personal information
3. The categories of personal data we collect
4. How we process your personal information
5. The legal basis for processing your personal data
6. How we share your personal information
7. How long we retain your personal information
8. How we keep your personal information secure
9. Transfers of your personal data outside the EU / EEA
10. Your rights in relation to your personal data
11. How complaints can be made and how we can be contacted

If there are any changes in the way your personal information is processed, this Privacy Policy will be updated.

## 2. What is personal data?

Personal data consists of all information that tells us something about you. This may include, for example, names, contact details, date of birth, bank account information or information about your needs or circumstances that enable us to identify you.

Certain personal data are classified as “special” data under data protection legislation. These include information on health, racial or ethnic origin, religious conviction or political opinion and sexual orientation.

Such information is more sensitive and requires further actions / reasons for collecting, storing or using such information.

There are also additional restrictions on the conditions under which we may collect and process criminal records. References to personal data contained in this Privacy Policy will include personal data and, where applicable, specific categories of personal data.

## 3. What personal data do we collect?

We will collect your full name and contact details (such as phone number, email address and postal address)

from you when you hire us. In addition, if we provide our services to you or on your behalf, and if we are required by law, we will collect information pertaining to you, which will include at least one form of photo identification (such as passport, driving license or other ID document) and a form of documentation that shows where you live.

We will also verify whether you have relatives or associates working for Savills IM so that we can consider potential conflicts of interest and, as far as they exist, how these should be treated in accordance with our obligations under laws and ordinances. Depending on the services we provide to you (or on your behalf) we may also collect additional personal information as described below.

### Investment

When you hire Savills IM as an individual investor, we will collect the information needed to identify you to meet the requirements to counter money laundering and terrorist financing. If the investor is a legal person such as a company or foundation, we may need to collect personal information about representatives and other principals / stakeholders of the legal entity.

### Other

If you subscribe to share information about research, news or other market updates from us, we will collect, in addition to the above, details about the industry in which you work and what kind of content you would like to share.

## **4. How we use your personal information**

### **What legal basis do we have for managing data?**

According to applicable data protection laws, we only have the right to use your personal information in cases where we have legal basis for the treatment.

Our processing of your personal data is based on the following legal bases;

- Your employment contract or to fulfil labour law obligations
- Information required to fulfil an agreement we have made with you
- Complying with our legal obligations

When processing is necessary for purposes related to Savills IM, or third party legitimate interests, provided that your interests or fundamental rights and freedoms do not contemplate these interests, including:

- Treatment necessary to promote our business, brands and products, and to measure the scope and effectiveness of our campaigns. This will include sending market information to you from time to time after hiring us to provide services or after receiving services from us that may be similar and of interest to you or if you explicitly indicated that you would like to receive such information. You may at any time decline the receipt of the information.
- Treatment necessary to increase our knowledge in the real estate market – which will include market analysis and research so that we can better understand the trends in the market and provide better knowledge along with more tailor made and relevant services to our customers in the future.
- Processing that is necessary to effectively manage the administrative and technical aspects of our business – which will include: to verify the accuracy of the information we store about you and create a better understanding of you as a customer; processing for administrative efficiency purposes, such as investigating the cases in which we use externally specialized skills to manage certain administrative tasks; processing related to network and information security, i.e. in order for us to take action that protects your personal data from loss, damage, theft and unauthorized access or to fulfil your request related to your rights as described below.

- In some more limited cases, we may also rely on the following legal bases:
- When we need to protect your fundamental interests (or someone else's interests), and/or
- When it is called for in the public interest or for the exercise of authority.
- Under the following limited circumstances, we may process special categories of personal data and criminal records:
- When applicable legislation requires or allows us to process such categories of personal data.
- How we process your personal information
- For specific information about how your personal information will be used in the framework of the services that you use, please choose one of the options below:

## Investment

In the event that you hire us to provide portfolio management, we may share your personal information with external lenders to the extent that it is necessary for us to fulfil our obligations to you, to arrange financing for you and for to carefully manage and advise you in your real estate investments.

In case you hire Savills IM, we will collect and store your personal data in order to maintain a register of investment holdings to comply with relevant laws and regulations.

## Other processing of your personal data:

If we sell parts of our business and / or integrate with another organization, your personal information may be disclosed to our advisors and to prospective buyers or joint venture partners and their advisors. If this happens, the new owners will be the business and may only have permission to use your personal information in the same or similar manner as set forth in this Privacy Policy.

We will share personal data with the legislators, state or governmental organizations, law enforcement agencies, as well as the courts, tribunals and arbitration tribunals that will, from time to time, be required to fulfil our obligations arising from laws and regulations;

When we use external service providers who process personal information on our behalf in order to provide us with services. This includes providers of IT systems and IT consultants as well as external reference or screening organizations for the purpose of detecting and preventing crimes.

If there is a need for us to fulfil our obligations to you, we may share your personal information with any or all of the people working in the Savills Group.

We will store your personal information in our CRM systems and use them to provide marketing related services provided by Savills IM and similar to the services you hired us to provide and which we believe may be useful to you from time to time. You may at any time decline the receipt of the information.

## **Other recipients of personal data**

We may transfer your personal information to other Savills IM companies, which may include, but not limited to, transfers of personal data to Savills IM Group's parent company Savills Investment Management LLP in the United Kingdom. Any possible transfer of personal data outside the EU / EEA will be subject to the safeguards provided by this Privacy Policy.

## **What happens if you do not provide us with the information we request?**

We need some information to fulfil our legal obligations. For example, we may need identity documents from you to fulfil our anti-fraud and money laundering obligations. If you do not provide the necessary information to fulfil these purposes, we will not be able to fulfil our agreement with you and may be prevented from providing services to you or to continue providing certain services to you. If such a situation arises, you will be notified of this when we collect information from you.

## **5. How we keep your information safe**

The security of personal data is very important for us and we have taken measures designed to prevent unauthorized access to your personal information, including but not limited to:

- Our client files are stored on our secure CRM system. Access to CRM systems is limited to those in the business that for legitimate business purposes need access to your information.
- Physical copies are stored in locked cabinets.

All personal data is stored in data centres, which have systems and on-site protection to protect against unauthorized access, as well as other external factors that could harm your personal data. There are strict eligibility requirements in place and the access is limited to those persons whose access is strictly necessary.

We ensure that access to personal data for Savills IM employees and employees or other persons working within the Savills IM Group is limited on a demand basis. Education is provided to Savills IM employees and workers who need access to personal data.

## **6. How long do we store your personal information?**

The time during which we store your personal information will vary depending on the type of service you have requested. The storage period may be longer than the time during which we provide you

services if it is by law or regulation that we have a duty to store personal data for a long time or in cases where we may need to store the information due to legal claims.

## **7. Transfers of personal data outside the EU / EEA**

We may transfer, store or process your personal data in locations outside the United Kingdom and the European Economic Area (EEA). In cases where the countries where your personal data have been transferred does not have the corresponding privacy data provided under laws of the United Kingdom, we will ensure that appropriate safeguards are in place.

### **We will take one of the following safeguards:**

- Transfer the information to a non-EEA country with data protection laws that provide the same protection as in the EEA. Read more on the European Commission website.
- Agrees with the recipient of the information that they must protect it accordingly, as in the EEA. Read more on the European Commission website.
- Transfer the information to organizations that are certified under the EU / US Privacy Shield. This is a framework that provides for security levels for personal data transmitted between US and EU countries. The framework ensures that the safety levels correspond to those used in the EEA. You can read more about data protection on the European Commission website.

## **8. Your rights in relation to your personal data**

You have a number of rights in relation to your personal information, which includes the right to:

- Be informed about how we use your personal information
- Access your personal information as we process
- Request that your personal information be corrected if you feel incorrect, incomplete or incorrect.
- Request that we delete your personal information in the following circumstances:
  - If Savills IM continues to process personal data beyond the time during which it is necessary to do so for the purpose for which personal data was originally collected
  - If Savills IM relies on consent as the legal basis for the processing and you revoke your consent

- If Savills IM relies on the legitimate interest as a legal basis for treatment and you oppose treatment, and there are no critical legitimate reasons that allow us to continue treatment
- If personal data has been processed in violation of law (i.e., contrary to the requirements of data protection legislation)
- If it is necessary to delete personal data to comply with legal obligations
- Ask us to limit our treatment when:
  - You believe that personal information is incorrect
  - You believe that our processing of your personal information is in violation of law
  - We no longer need your personal information, but you request that we keep them in order to determine, enforce or defend a legal claim
  - You have objected to our processing of your personal data
- Request a copy of certain personal data that you have provided to us on a commonly used electronic format. This right includes personal information that you have provided to us as we need to fulfil our agreement with you and processing of personal data that relies on consent as a legal basis
- Oppose our processing of personal data where we rely on the legitimate interest as a legal basis or performance of data that is of public interest. If you make an objection, we will assess whether we have a decisive legitimate reason, which allows us to continue processing your personal information; and
- Do not be subject to automated decisions that have legal consequences, or which may have consequences of equivalent importance to you.

If you would like to exercise any of your rights, please contact [info@savillsim.com](mailto:info@savillsim.com).

## 9. Complaints and contact details

### Complaint

If you have complaints about how we use your personal information, please contact us via [info@savillsim.com](mailto:info@savillsim.com) who will try to resolve your case. If we cannot find a solution, you are entitled to bring your complaints to the Information Commissioner's Office in the United Kingdom. If you need



further information on how to contact the Information Commissioner's Office, please inform us via [info@savillsim.com](mailto:info@savillsim.com).

### **Contact details**

If you have any questions, comments or other requests regarding any part of this Privacy Policy, please do not hesitate to contact us by emailing [info@savillsim.com](mailto:info@savillsim.com) or by writing to Data Protection Champion, Savills Investment Management LLP, 33 Margaret Street, London W1G 0JD.

## Important notice

This document is provided by Savills Investment Management (UK) Limited regulated by the Financial Conduct Authority, number 193863, whose holding entity is Savills Investment Management LLP of 33 Margaret Street, London W1G 0JD, a limited partnership registered in England, number: OC306423, which is also regulated by the Financial Conduct Authority, number 615368.

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