

## Redefine Europe Privacy Statement website

---

### 1. Introduction

We are the Redefine Europe B.V., a limited liability company incorporated under the laws of the Netherlands (“we” or “us”). We are a subsidiary of Redefine Properties Ltd., a leading South African-based Real Estate Investment Trust (REIT).

We process personal data. In doing so, we generally act as a controller within the meaning of the General Data Protection Regulation. Personal data processed by us relates to persons who are clients or are employed by our clients ("clients") and third parties, like persons who are visitors to our website or subscribe to our newsletter ("third parties").

### 2. What personal data do we process

We process the following data:

- a. contact details (name and e-mail address and similar data required for communication) and communications content of (potential) clients;
- b. data in connection with a visit to our website, such as data for the purpose of identifying and communicating with the visitors to the website or data recorded to collect visitor statistics with regard to our website (see paragraph 6 below);
- c. data with regard to electronic messages originating from or addressed to third parties and data that are necessary for the purpose of maintaining contact with these third parties.

### 3. For what purpose do we process these data and on what legal basis

We only process personal data if we have a valid legal basis for doing so. We therefore only process the abovementioned data if:

- a. the processing is necessary for the performance of an agreement with the data subject or in order to take steps at the request of the data subject prior to entering into an agreement (“fulfilment of agreement”);
- b. the processing is necessary to comply with a legal obligation to which we are subject (“legal obligation”);
- c. the processing is necessary for the purposes of the legitimate interests pursued by us or by another person, and those interests outweigh the interests or fundamental rights of the person whose data are concerned (“legitimate interest”), as is the case, for example, when we use contact details for sending unsolicited commercial messages for maintaining our business relationships, the legitimate interest being maintaining contact and sending information about our services; or
- d. the data subject has given his consent to the processing (“consent”).

### 4. With whom may we share personal data

We may share personal information about clients and third parties with:

- a. persons who work for us;

- b. suppliers (for example hosting providers or the provider that collects the usage statistics for our website, see paragraph 6 below);
- c. others, with the consent of the data subject, or in the case of a legal obligation.

"Persons who work for us" refers to employees of Redefine Europe B.V. and other persons associated with us (such as partners, consultants and contractors).

#### **5. How we protect your personal data**

We apply various technical and organizational measures to protect your personal data against destruction, loss, alteration or unauthorized disclosure or access. These comprise administrative, physical and technological measures. Persons who work for us are bound to secrecy and must abide by our instructions aimed at the adequate protection of your data.

#### **6. Cookies on our website**

Our website applies cookies, as we use Google Analytics, a service that provides us insight into the manner in which our website is used. This relates to statistics of use like the number of unique visitors, the pages visited and the average duration of a visit. We have concluded a processing agreement with Google to ensure that personal data that are collected for us in the context of Google Analytics, are only used to give us insight into the manner in which our website is used. We have also adapted the settings of the service in such a way that the data may not be deployed by other Google services, and that the last digits of all the IP-addresses collected in this scope are immediately erased. This makes it more difficult to link data to a specific visitor.

#### **7. Transfer to countries outside the EEA**

Your personal data may be transferred to a country outside the European Economic Area (EEA) that provides a lower level of protection to personal data than the legislation in the EEA. For example, we may use a supplier of internet hosting services which is established outside the EEA (for example in South Africa), and the use of these services may involve a transfer of personal data to the supplier.

If such situation presents itself, and personal data are transferred to a country outside the EEA that provides less legal protection to personal data, we will provide for appropriate safeguards in order for the transfer to take place in accordance with the privacy laws here. We may do this by concluding a contract with the recipient in accordance with a format that the European Commission or a national supervisory authority has approved for this purpose.

#### **8. How long do we retain personal data**

We do not retain personal data any longer than necessary.

#### **9. Your rights with regard to your personal data**

The laws on the protection of personal data give you the following rights with regard to personal data relating to you:

- a. the right to request whether or not personal data concerning you is processed, and, if this is the case, to get access to these;
- b. the right to request rectification and erasure of these data;
- c. the right to object the processing or to ask for a restriction of the processing;
- d. the right to withdraw the consent to the processing, if the processing is based on your consent;
- e. the right to receive your data or have this transmitted to an organization designated by you, in a structured, commonly used and machine-readable format; and
- f. depending on the country where you live, the right to file a complaint with a supervisory authority that monitors the compliance with the rules for the protection of personal data. In the Netherlands, this is the *Autoriteit Persoonsgegevens* in The Hague ([www.autoriteitpersoonsgegevens.nl](http://www.autoriteitpersoonsgegevens.nl)).

We will deal with a request in connection with the exercise of these rights in the manner as prescribed by law. However, these rights are not absolute; they do not apply under all circumstances and the applicable rules provide for exceptions. If we do not grant your request, we will explain to you why.

## 10. Contact details

In order to exercise the rights described above, you can send an email to ([enquiries@redefineurope.nl](mailto:enquiries@redefineurope.nl)). You may also use this email address if you wish to file a complaint about the manner in which your personal data have been processed by us. If you are dissatisfied with the manner in which we dealt with your complaint, you can file a complaint with the *Autoriteit Persoonsgegevens* or, if you reside or work in another country of the EEA, with the supervisory authority in that country.

## 11. Amendments

This statement was amended on 17 May 2019 for the last time.

If we amend this statement in the future, we will publish the amended statement on our website, stating the data on which the amendments will take effect. If there are amendments that affect one or more data subjects to a considerable degree, we will do our best to also directly inform these data subjects about this.