
PRIVACY POLICY

Almacantar Website Privacy Notice

Almacantar Group (“Almacantar”, “we” and “us”) is committed to protecting the privacy of those with whom we interact, and we recognise the need to respect and protect information that is collected or disclosed to us (called “Personal Information”, explained below).

This Privacy Notice is intended to tell you how we use your Personal Information, and we’ve tried to explain what we do in enough detail to give you the information you need at a glance, with the option of following a link if you want to find out more. If you still can’t find the information you need, you can email us at data.protection@almacantar.com.

The Privacy Notice applies to Almacantar websites that refer to or link to this Privacy Notice and will apply whether you access our website using a computer, mobile phone, tablet, TV, or other device.

1. Who are we?

We are the controller of the Personal Information (explained below) that we collect about you. We have a current registration (number ZA109754) in the Data Protection Register and our office manager is responsible for overseeing 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 our office manager using the details set out below.

Contact detail

Our full details are: Almacantar Limited

Email address: data.protection@almacantar.com

Postal address: 3 Quebec Mews,
London, W1H 7NX

2. What is Personal Information and what Personal Information does Almacantar collect about you?

“Personal Information” consists of any information that relates to you and/or information from which you can be identified, directly or indirectly. For example, information which identifies you may consist of your name, address, telephone number, photographs, location data, an online identifier (e.g. cookies identifiers and your IP address) or to one or more factors specific to your physical, physiological, genetic, mental, economic, cultural or social identity. When we combine other information (i.e. information that does not, on its own, identify you) with Personal Information, we treat the combined information as Personal Information.

We may collect, use, store and transfer different kinds of Personal Information about you which we have grouped together as follows:

Identity Data includes first name, last name and title.

Contact Data includes address, email address and telephone number (whether personal or professional), occupation and role within an organisation, and bank account information.

Technical and Usage Data includes internet protocol (IP) addresses, the type of browser used while visiting our website, the number of visitors to our website, usage session dates and duration, page views, and how you use our website.

Marketing and Communications Data includes your preferences in receiving marketing from us and third parties and your communication preferences.

3. How is your Personal Information collected?

Almacantar collects information when a user visits our website, when we deal with our corporate investors, contractors, suppliers and corporate landlords and tenants, and when a buyer or tenant purchases our services or communicates with us whether by the telephone, email or post. We use different methods to collect data from and about you including:

I. Personal Information you provide directly. You may give us your Identity, Contact and Marketing and Communications Data by corresponding with us by email, phone or otherwise. This includes Personal Information that you provide when you:

–Deal with us regarding one of our properties,

–Otherwise interact with us.

II. Automated technologies or interactions. As you interact with our website, we may automatically collect Technical and Usage Data about your equipment, browsing actions and patterns. We collect this Personal Information by using cookies and other similar technologies. Please see section 10 below and our cookie policy for further details.

III. Third parties or publicly available sources. We may receive personal data about you from various third parties and public sources including but not limited to:

–Technical and Usage Data from Google Analytics.

–Identity and Contact Data from publicly available sources such as Companies House and HM Land Registry.

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4. How do we use your information?

We may use the Personal Information that we collect for the following purposes:

I. Deliver our services – as a property investment and development company, to deal with our current and prospective buyers, landlords and tenants, to liaise with our suppliers, contractors and building managers and to comply with our obligations to our shareholders;

II. Business Purposes – for business monitoring and internal record keeping including maintaining our accounts, administering our systems complying with good practice and for other administrative, operational and security reasons;

III. Services and Website

Improvement – to identify trends in the real estate market, to improve our services and to create promotional and business plans, to conduct web analytics and ensure content from our website is presented in the most effective manner and to enhance the user experience;

IV. Customer Support Services – to respond to enquiries about our properties and to provide customer support services;

V. Recruitment purposes – we will process job applicants' personal data for recruitment purposes;

VI. Legal Obligations – to comply with our legal and regulatory obligations; and

VII. Updates – to communicate with you, including communicating with you about your transactions with us, giving you important information about our services and sending you notices about any material changes to our Privacy Notice.

The law allows us to use the Personal Information as set out above on the basis that the processing is necessary for the performance of a contract with you, or we are acting in our "legitimate interests" in ensuring our business is run efficiently, provided your fundamental rights and freedoms are not overridden.

Marketing communications

Almacantar may use your Personal Information to provide you with email notifications and other communications by email and post, telephone, and/or text message (SMS) and digital and social media, on the basis that we obtain your consent to use your Personal Information for these purposes. For further information on this, see the 'Your Choices' section of this Privacy Notice.

Combining Personal Information

We may combine the Personal Information that we collect from you (including information received from our affiliates) to the extent permitted by applicable law. For example, we may combine various different databases that contain your Personal Information to allow us to provide better support services and more personalised content (such as, marketing).

5. To whom do we disclose your information?

We will use your Personal Information for our internal business purposes, some of which are mentioned above. We may also sell your Personal Information to third parties. We may disclose your information to the following entities:

I. Almacantar Affiliates

We may need to transfer your Personal Information to other Almacantar affiliates (as defined in section 1159 of the Companies Act 2006) to provide the services you require or any other services/assistance you request. All Almacantar affiliates are required to follow the privacy practices set forth in this Privacy Notice, or such other privacy notice that they may notify to you.

II. Service Providers

We use third party service providers to help us to administer certain activities and services on our behalf, such as analysing usage of our services, providing our website and IT infrastructure, and sales and customer relationship database management

systems. We may share Personal Information about you with such third-party service providers solely for the purpose of enabling them to perform services on our behalf and they will operate only in accordance with our instructions. Here are examples of third-party service providers we use:

a. Analytics Service Providers – analytics providers are used to assist us in understanding the usage of our services and to enable us to improve our services. The analytics provider we currently use is Google Analytics. For further information see our Cookie Policy.

b. IT Consultants – we use IT consultants to assist us in the provision of our website and business administration. We currently use CMI and Space Galleon to host our website.

III. Anonymous statistics

We prepare and develop anonymous, aggregate or generic data and statistics for various reasons (such as aggregate usage statistics including "page views" on our website, and analysing demographics). As this data is anonymous (i.e. you cannot be identified from it) we do not consider this information to be Personal Information. As such, we may share it with any third party (such as our affiliates, partners, advertisers or otherwise).

IV. Third parties when required by Law or to Protect our Services

We will disclose your Personal Information to comply with applicable law or respond to valid legal process, including from our regulators, law enforcement or other government agencies; to protect our customers (e.g. to prevent spam or attempts to defraud users of our services); to operate and maintain the security of our website (e.g. to prevent or stop an attack on our systems or networks); or to protect the rights or property of Almacantar, including enforcing any terms or agreements governing the use of our services.

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V. Other Parties in Connection with Corporate Transactions

We may disclose your Personal Information to a third party (or other Almacantar affiliate) in the event that all or substantially all of our business or assets are or are intended to be sold or otherwise assigned to another entity.

VI. Other Parties At Your Direction

We may share Personal Information about you with third parties when you request such sharing, including your property manager, financial adviser, solicitor or accountant.

6. What do we do to keep your information secure?

We have put in place appropriate physical and technical measures to safeguard the Personal Information that we collect in connection with our services. In addition, we limit access to your Personal Information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your Personal Information on our instructions and they are subject to a duty of confidentiality. However, please note that although we take appropriate steps to protect your Personal Information, no website, device, online application or transmission of data, computer system or wireless connection is completely secure and therefore we cannot guarantee the security of your Personal Information.

International Transfer of Data

The Personal Information that we collect from you may be stored and processed in your region, or transferred to, stored at or otherwise processed outside the European Economic Area ("EEA"), including but not limited to Hong Kong, China, Dubai, Bahrain and the USA or in any other country where Almacantar or Almacantar affiliates, agents or service providers maintain facilities. By using our website and/or providing us with your Personal Information, you acknowledge that we will collect, transfer, store and process your information outside the EEA. We will

take all steps reasonably necessary to ensure that your Personal Information is kept secure and treated in accordance with this Privacy Notice and the requirements of applicable law wherever the data is located.

Where we transfer your Personal Information outside the EEA to other third parties, we will ensure that appropriate transfer agreements and mechanisms are in place to help ensure that our third-party service providers provide an adequate level of protection to your Personal Information. We will only transfer your Personal Information outside the EEA in accordance with applicable laws or where you have given us your consent to do so.]

7. Data Retention – How long we will store/keep your Personal Information

Almacantar retains Personal Information for as long as necessary to fulfil the purposes for which your Personal Information has been collected as outlined in this Privacy Notice unless a longer retention period is required by law. When your Personal Information is no longer required for the purpose it was collected or as required by applicable law, it will be deleted and/or returned to you in accordance with applicable law.

8. Accessing your Personal Information and other rights you have

Almacantar will collect, store and process your Personal Information in accordance with your rights under any applicable data protection laws. Under certain circumstances, you have the following rights in relation to your Personal Information:

I. Subject Access – you have the right to request details of the Personal Information which we hold about you and copies of such Personal Information.

II. Right to Withdraw Consent – in the limited circumstances where you have consented to our processing of your Personal Information, you have the right to withdraw such consent at any time. In the event you wish to withdraw your

consent to processing, please contact us using the details provided in section 13.

III. Data Portability – you may, in certain circumstances, request us to port (i.e. transmit) your Personal Information directly to another organisation.

IV. Rectification – we want to ensure that the Personal Information about you that we hold is accurate and up to date. If you think that any information we have about you is incorrect or incomplete, please let us know. To the extent required by applicable laws, we will rectify or update any incorrect or inaccurate Personal Information about you.

V. Erasure ('right to be forgotten') – you have the right to have your Personal Information 'erased' in certain specified situations.

VI. Restriction of processing – you have the right in certain specified situations to require us to stop processing your Personal Information.

VII. Object to processing – you have the right to object to specific types of processing of your Personal Information, such as, where we are processing your Personal Information for the purposes of direct marketing.

VIII. Prevent automated decision-taking – in certain circumstances, you have the right not to be subject to decision being taken solely on the basis of automated processing.

Enforcing your rights

If you wish to enforce any of your rights under applicable data protection laws, then please see section 13 below. We will respond to your request without undue delay and by no later than one month from receipt of any such request, unless a longer period is permitted by applicable data protection laws. We may, if permitted to do so by applicable data protection laws, charge a reasonable fee for dealing with your request which we will notify to you.

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Complaints

If you are concerned that we have not complied with your legal rights under applicable data protection laws, you may contact the Information Commissioner's Office (www.ico.org.uk) which is the data protection regulator in the UK which is where Almacantar is located. Alternatively, if you are based outside the UK, you may contact your local data protection supervisory authority.

9. Third-Party Links on Our Website

Our websites may contain links to other third-party websites that are not operated by Almacantar. These linked sites and applications are not under Almacantar's control and as such, we are not responsible for the privacy practices or the content of any linked websites and online applications. If you choose to use any third-party websites, any Personal Information collected by the third party's website will be controlled by the Privacy Notice of that third party. We strongly recommend that you take the time to review the privacy policies of any third parties to which you provide Personal Information.

10. Cookies

What are cookies?

Almacantar may use cookies on our website. Cookies are small text files that can be read by a web server in the domain that put the cookie on your hard drive. Cookies are assigned to and stored in a user's internet browser on a temporary (for the duration of the online session only) or persistent basis (cookie stays on the computer after the internet browser or device has been closed). Cookies collect and store information about a user's preferences, website usage and content viewed which allows for Almacantar to provide users an enhanced and customized experience when engaging with our website.

Further information on cookies

For further information on what cookies are, how Almacantar and other third parties use them, and for details of how cookies can be disabled, please see our Cookie Policy.

11. Your Choices (e.g. marketing-related emails or otherwise)

When you purchase our services, request information on our website, or otherwise communicate with us, we and other Almacantar affiliates may use your Personal Information (such as your contact details (e.g. name, address, email address, telephone number)) to send you marketing-related correspondence by email and post, telephone and/or text message (SMS) and digital and social media related to our services. When we process your Personal Information for marketing purposes, we do so on the basis that it is in our legitimate interests to do so in promoting our business.

We may share Personal Information with third parties for the third parties' marketing purposes.

We may also use your Personal Information to personalise and to target more effectively our marketing communications to ensure, to the extent possible, that any marketing-related correspondence is relevant to you.

To opt out of receiving marketing-related correspondence from Almacantar, please click "Unsubscribe" from any marketing or promotional email or text message (SMS) you receive from us.

12. Changes to this Privacy Notice

It also is important that you check back often for updates to the Privacy Notice, as we may change this Privacy Notice from time to time. The "Date last updated" legend at the bottom of this page states when the notice was last updated, and any changes will become effective upon our posting of the revised Privacy Notice.

We will provide notice to you if these changes are material and, where required by applicable law, we will seek your consent. We will provide this notice by email or by posting notice of the changes on the Almacantar website.

13. Contact Us / Further Information

If you have any questions regarding the collection, processing, or use of your Personal Information or if you wish to correct, block, rectify, object, access, revoke your consent to any applicable aspect of this Privacy Notice or delete any of your Personal Information, please contact us:

I. By mail:

Office Manager
Almacantar
3 Quebec Mews
London W1H 7NX

II. By email:

data.protection@amacantar.com

III. By telephone:

020 7535 290 (Monday to Friday,
9am – 5.30pm)

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