

Privacy Statement

This Privacy Statement explains how Global Property Research B.V. (GPR) handles your personal data.

1. How can you read this Privacy Statement?

For specific information, click on the relevant question in the Contents.

2. When do we publish changes to this Privacy Statement?

GPR may change this Privacy Statement. We will always inform you beforehand about major changes.

3. What are personal data?

Personal data are data that relay information about a natural person, such as the name, address or telephone number. Appendix 1 lists the categories of personal data that we are permitted to process. This Privacy Statement explains why and on what basis we can process which personal data.

4. What does ‘processing of personal data’ involve?

This covers everything we can do with personal data, such as collecting, storing, viewing or destroying them.

5. How do we handle personal data?

Your privacy is important to us. We comply with legislation and regulations, such as the European General Data Protection Regulation (GDPR) (in Dutch ‘Algemene Verordening Gegevensbescherming’, or AVG) and the Dutch GDPR Implementation Act (‘Nederlandse Uitvoeringswet AVG’). We strive to handle personal data as responsibly and carefully as possible. We do not sell personal data to third parties.

6. Does this Privacy Statement also concern your personal data?

References in this Privacy Statement to personal data concern the personal data of representatives of or people associated with a legal entity with which GPR has, or has had, a relationship.

7. How do we secure personal data?

It is very important to us that both your information and our information is safe. Our staff are subject to stringent rules. Our security arrangements meet the relevant standards. The

Netherlands Authority for the Financial Markets (AFM) and the Dutch Data Protection Authority (AP) monitor our security arrangements.

8. How do we deal with data breaches?

When a data breach occurs, personal data may end up in the wrong place. We report data breaches to the Dutch Data Protection Authority. We will not report a data breach if it does not constitute a significant risk to you. If there is a significant risk, we will inform you of the data breach. Such significant risks are identity theft or fraud, for example. The information that we provide to you in such a case will consist of an account of the events that have occurred and their consequences, if any. Furthermore, we will inform you about the measures that have been taken to minimise any adverse consequences.

9. What requests can you submit to us concerning your personal data?

Below is a list of the requests that you can submit to us concerning your personal data. The GDPR will determine whether we can meet your request, so you need to be aware that we may not always be in a position to do so.

You may submit your request by sending an e-mail to the Data Protection Officer at privacyofficer@gpr.nl. We will respond to your request as quickly as possible. There is no charge for handling your request, unless responding to it would involve a major effort on our part. We will inform you beforehand if we intend to charge any costs.

a. Improving or supplementing personal data

You can ask GPR to improve or supplement personal data if these are incorrect or incomplete.

b. Viewing personal data

You can ask GPR for access to your personal data and for a copy of them. You can also request information from us about our processing of your personal data, for example why we do this, and which categories of personal data we process.

c. Removing personal data

You can request that we delete personal data, for example if the personal data are no longer needed or if you have withdrawn your consent for us to use (process) them.

d. Objecting to processing of personal data

You can object to certain types of processing of personal data. This may for example be possible in case of the processing of your personal data by us for the purpose of direct marketing or for statistical purposes.

e. Restricting processing

You can ask us to restrict the processing of personal data temporarily, for example when we are in the process of verifying at your request whether your personal data are correct and complete, or when we are processing personal data without permission. You can also request that the processing of personal data be temporarily restricted if you feel you may need the data in legal proceedings or if you have objected to the processing of the data.

f. Transferring data

In certain situations, you can ask us to transfer back to you the personal data that you have provided to us so that you can use them yourself, or you can request that we transfer them to a third party.

10. Why do we process personal data?

GPR processes personal data for various reasons, as explained below.

a. Becoming a client

We are required by law to investigate a professional party before accepting them as a client at GPR. We will verify whether the legal entity and its representatives may be accepted as a client. This is known as the client acceptance investigation. The purpose of this investigation is to find out whether there might be any grounds for rejecting a person or a legal entity as a client. We will also investigate whether there are special considerations that we would have to take into account in our products and services, for example whether the legal entity or representative constitutes a heightened risk because they are on national or international sanctions lists. We have the right to process personal data for the purpose of such an investigation, insofar as we need such data in order to conduct the client acceptance procedure required by law.

We request personal data from the prospective client for the purpose of conducting this investigation. The information requested may consist of a copy of proof of identification, personal identification data, financial data, a copy of the shareholders' register of the legal entity concerned, and information from criminal records. We may also draw on external sources for this investigation, such as the Chamber of Commerce register, and the Internet.

GPR may only provide investment services to a legal entity or a representative once the necessary personal data have been received.

b. Being a client

GPR also processes clients' personal data during the client relationship.

➤ *To contact the client*

We interact with the client during the relationship, for example by telephone (landline or mobile phone), e-mail, text messages or post, or by means of a datafeed. We use personal identification data for such interactions. We have the right to process these personal data insofar as they are needed to honour our contract with the client.

➤ *To honour the contract*

We process personal data in order to honour the contract with the client. If there are problems in the client relationship, we may also process personal data in order to find a solution.

➤ *To meet legal obligations*

We are required by law to keep a record of certain personal data. This applies to information concerning the client acceptance investigation, for example.

In meeting our legal obligations, we may be required to submit information, including personal data, to public authorities or to regulatory bodies such as the competent market supervisory authorities in the Netherlands or abroad. This may be in response to validly made requests for information by such authorities or may be initiated by us in connection with legal requirements that we are subject to.

c. The relationship between the client and GPR has been or will be terminated

We will retain the personal data we have collected if the relationship with the client has come to an end or will be terminated, pursuant to legal retention requirements or for the purpose of winding up the contract with the client, or if this information is needed in a dispute that arose while the relationship was being terminated or thereafter. You can object on personal grounds to the processing of personal data in view of this personal interest; for more information on this subject, please refer to the section ‘Objecting to processing of personal data’.

d. For the security and integrity of the financial industry and to prevent and limit fraud

Investigations into possibly fraudulent actions help maintain the financial industry’s security and integrity. Personal data of clients may be processed in the course of such investigations.

We have the right to process personal data for this purpose because we have a duty to maintain the security and integrity of our business processes, which is also in the justifiable interests of our clients, the financial industry, our staff and our company as a whole.

e. For promotion and marketing

Our promotion and marketing activities consist of attracting new clients and maintaining existing client relations.

➤ *Attracting new clients*

To attract new clients, we process personal identification data and personal characteristics from external sources, and compare these with personal data of our clients. We process personal data of potential clients with a view to contacting them within a reasonable period of time. In the ensuing interaction, we will ask for permission to process that personal data. Such permission can easily be withdrawn at any time, but not retroactively: data processed until such time as permission is withdrawn will have been processed legally. If granted permission specifically for that purpose, we can use personal data to inform clients about products and services for example, or to send them newsletters. Furthermore, we limit retention of personal data of clients who inform us that they are not interested in our services, so as to prevent the client from being contacted nevertheless. For more information, see the section ‘How long do we keep personal data on file?’.

➤ *Maintaining existing client relationships.*

We employ promotion and marketing to draw clients’ attention to new products and services or to improve the service that we provide to our clients. For the purpose of marketing activities, we have the right to process personal data such as personal identification data, personal characteristics, information on products and services, and electronic identification data.

We have a corporate interest in marketing and promotion as these support our business operations. Clients can object on personal grounds to the processing of personal data in view of their personal interest. The section ‘Objecting to processing of personal data’ provides more information on this subject.

11. Do we share personal data with third parties?

It is possible that we may share your personal data with third parties. We would only do this to make our business processes more efficient.

Supporting business operations

We engage third parties that lend support to our business operations and process personal data for us in order to do so. They are referred to as processors. For example, we collaborate with a third party that handles marketing for us, and with another third party that manages our customer relation management system. We make agreements with these third parties to ensure that the personal data we share are safe with them. We select such third parties only after thorough investigation and demand from them that they keep your personal data safe. We are only permitted to share personal data with third parties in the interests of our business operations, more specifically in our legitimate interest to optimise our processes.

12. Do we share personal data with organisations outside the EEA?

We try to restrict the sharing of personal data with organisations in countries outside the European Economic Area (EEA), because these countries may have lower standards for the protection of personal data. In the exceptional cases when we do share such information outside the EEA, we do so only in order to honour a client contract, or because specific guarantees have been put in place to protect personal data. For individuals whose personal data are shared with third parties outside the EEA, GPR will remain the point of contact concerning the processing of this information.

13. How long do we keep personal data on file?

We observe maximum retention periods for personal data. These retention periods are specified in the table in Appendix 2. The personal data are deleted when the maximum retention period has ended.

14. Cookies

Our cookie statement at <https://www.globalpropertyresearch.com> explains how we deal with your personal data that are processed by us using cookies.

15. Do you have any questions or complaints?

For general questions or complaints concerning this Privacy Statement, please contact the Data Protection Officer at privacyofficer@gpr.nl. If you feel that your rights have been violated by GPR, you can submit a complaint to the Compliance Officer at info@solactive.com, or at the Dutch Data Protection Authority (‘Autoriteit Persoonsgegevens’): www.autoriteitpersoonsgegevens.nl.

Where can I find more information on privacy?

For more information in general about privacy, please refer to the Dutch Data Protection Authority website: www.autoriteitpersoonsgegevens.nl.

Appendix 1 Categories of personal data that may be processed

This overview lists the categories of personal data that we are entitled to process by law. The Privacy Statement explains for what purpose and on what basis we are permitted to process these personal data.

Category of personal data	Example
Personal identification data	Name, address, town/city, post code, e-mail address, telephone number, signature,
Electronic identification data	IP address, cookies
Communication data	Information recorded from face-to-face-interactions; interactions by telephone, e-mail, letters; recordings of conversations about services; recordings of complaints and queries
Criminal data	Criminal convictions and criminal offences

Appendix 2 Retention periods

Data type	Retention period
Personal data concerning the client	Ten years following termination of the relationship
Personal data of potential client who has yet to be contacted	Six months following collection
Personal data of potential clients who have stated they want to be contacted	Three years following the last contact
Contact data of potential clients who have declined further contact	Three years following notification that the potential client no longer wishes to be contacted
Conversations with clients (and potential clients) on benchmarks by landline and mobile phone, electronic means of communication such as e-mail	Ten years following recording

The stated retention periods may only be extended if at the end of the retention period a complaint is in the process of being dealt with, or legal or regulatory criminal proceedings or investigations have been initiated in connection with the relation or former relation. The retention periods for personal data stored at third parties are the same as for GPR. Our Cookie Statement specifies the retention periods observed for the various cookies.