

AEDIFICA - PRIVACY POLICY

Version 1.02

Aedifica NV/SA, a public regulated real estate company under Belgian law (hereafter “**Aedifica**”), is committed to protecting and respecting your privacy. This Privacy Policy explains how Aedifica and/or its subsidiaries handle your personal data.

As the case may be, this Privacy Policy must be read together with our Cookie policy, which can be found [here](#). Please read the following carefully to understand our views and practices regarding your information and how we will use it.

By using our website¹ and/or our services, you acknowledge that you have read and understood the terms of this Privacy Policy.

We may amend this Privacy Policy from time to time, for example, in connection with new features on our website or to comply with new legal, contractual or administrative obligations. Important changes to our Privacy Policy will be posted on this page. Please consult this page regularly to see any changes to the Privacy Policy. Your continued use of this website or our services following the notification of changes to this Privacy Policy will indicate your acceptance of these changes.

This Privacy Policy was most recently updated on 25 January 2022.

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¹ www.aedifica.eu

1. When is this Privacy Policy applicable?

This Privacy Policy applies to all activities of Aedifica and/or its subsidiaries whether offered via our website or not, unless a specific privacy policy is available.

Our website may, from time to time, contain links to and from websites and/or applications of our partner networks. To the extent that hyperlinks or banner advertisements incorporating hyperlinks are utilized to access third party websites and/or applications, you should be aware that these third-party websites and/or applications are not controlled by us and have their own privacy policies. Therefore, they are not subject to this Privacy Policy and we do not accept any responsibility or liability for these policies. We recommend to check these policies before you submit any information to these websites and/or applications.

2. Who is responsible for processing of your personal data?

Aedifica, a public regulated real estate company whose registered office is established at Belliardstraat/Rue Belliard 40 (box 11), 1040 Brussels (Belgium), is the controller of the processing of all your personal data. This means that Aedifica determines for what purposes and with what means your personal data will be processed.

3. Which personal data do we process about you?

• **Information that you provide to us**

We process directly identifiable information about you, such as your name, address, phone number, etc., if you yourself provide us with your personal data, for example;

- through the contact form on our website,
- when you subscribe to our newsletter, press list or investors mailing list via our company website (www.aedifica.eu),
- when you request the registration of your dematerialised shares,
- when you conclude a contract with us in your own name or as a representative of a legal entity and we carry out a prior verification of your identity and/or power of representation,
- when you contact us directly by e-mail, phone or otherwise,
- when you give us your business card,
- when you apply for a job with Aedifica,
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- **Information provided to us by third parties**

Exceptionally, we may process directly identifiable information about you provided to us from other sources, for example when we engage a recruitment office for the search of an employee for a vacant position and certain personal data (e.g. your name, your contact information, your resume, etc.) are to that purpose made available to us or when we collect anti-fraud data (e.g., for prevention of money laundering and terrorist financing). In such cases, unless we have reason to doubt this, we assume that the original source from which we receive your information has collected such information in accordance with the data protection rules.

- **Automatically generated information**

We also process certain information about your that we generate automatically:

- when you visit our website, such as the pages you are visiting, time and duration of your visit, your IP address, etc. Such data is collected via cookies and other tools our website is using. See in this regard our [Cookie Policy](#);
- when you enter our office building and pass by one of our surveillance cameras. Such data is processed in accordance with the applicable data protection rules in general and the applicable camera legislation in particular (see below).

4. Why and how do we process your personal data?

All data we collect from you, will be processed by us in accordance with the Regulation 2016/679 of 27 April 2016 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) (GDPR), and any applicable corresponding or equivalent national laws or regulations, as in force and applicable, and as may be amended, supplemented or replaced from time to time.

4.1. For the technical and functional management of our website

We process personal data for the technical and functional management of our website and to make our website easy to use. By using your data, we can check how our website are used and we can improve their content and layout. This data also allows us to adequately secure our website.

For this purpose, we only process non-directly identifiable information such as your IP address, the pages you visit, the time and duration of your visit etc. We do this, for example, by using cookies. More information about the use of cookies can be found in our [Cookie Policy](#).

We process this data based on your (cookie) consent or on the legitimate interest of Aedifica in providing a well-functioning and secure website. When the processing of your personal data is based on your consent, you may withdraw your consent at any time (see below under section 9).

4.2. In the context of our operational functioning, day-to-day business management and administration

We process your personal data when carrying out our ordinary business activities.

To this end, we can process data such as your contact details, your function, your company, your powers to represent a company, your address, your e-mail address, your bank account number and date of birth.

We process this information, depending of the activity, based on our obligation to comply with legal obligations (e.g. shareholder administration), on the basis of the performance of a contract to which you are a party, or based on our legitimate interest in pursuing an efficient and smooth operation of our business (e.g. keeping a list of our professional contacts).

4.3. To keep you informed about our activities

Aedifica processes your personal data when you wish to be kept informed about the latest Aedifica Investors Information, e.g. by signing up to the investors mailing list on the website, or by submitting a request via the contact form on the website to receive our annual report, press releases or other investor related information (www.aedifica.eu).

To this end, we can process data such as your name, your job, your company name, your address, your e-mail address, your rental preference, your telephone number and your preferred language.

Depending on the case, we process this information based on your consent or based on our legitimate interest to keep our stakeholders informed about our activities. If the processing of your personal data is based on your consent, you may withdraw your consent at any time (see below under section 9).

4.4. To answer your questions

If you ask us a question by telephone, via the contact form on our website or by e-mail, we will process your personal data in order to answer that question.

For this purpose, we can process data e.g. your name, your contact information, your correspondence with us, and any other personal data you provide us with that may be relevant to answering your question.

We process this information based on your consent. You are free to provide us with your personal data for this purpose, and you may withdraw your consent at any time (see below under section 9).

4.5. To contact you in the context of a selection and recruitment process

When you apply for a job at Aedifica or one of its subsidiaries (e.g. by mail, at a job fair ...), we process your personal data in order to contact you and to follow up on your application.

For this purpose, we process data such as your name, your contact information, your correspondence with us, your resume, and other documents you provide us with.

The processing of your personal data for this purpose is based on your request to take steps prior to (possibly) entering into a contract or on our human resources related legitimate interests, including identifying, screening and evaluating your profile for potential employment.

4.6. To secure our office building

A surveillance camera is installed in in our office building.

The camera images are processed based on our legitimate interest to secure and protect its buildings and the persons living therein. Please also note that entering a place where a pictogram indicates that camera surveillance is taking place is considered as prior consent under Belgian camera legislation.

The camera images are processed (collected and registered; no real time monitoring) in accordance with the applicable data protection rules in general and the applicable camera legislation in particular. In line therewith, all cameras are duly indicated by the appropriate pictogram, have been duly notified to the competent authority and are registered in a specific record.

4.7. To comply with our legal obligations

We process your personal data to comply with legal, regulatory and administrative obligations, arising from, inter alia, company or tax law. This may involve, for example, keeping a register of registered shares, etc.

For this purpose we keep data such as, among others, your name, contact and bank details, transaction data.

This processing takes place based on our need to comply with our legal obligation.

4.8. For fraud prevention

Although Aedifica is not a subject entity in the sense of the Belgian Money Laundering Prevention Act², based on principles of corporate governance it applies certain principles of the Money Laundering Prevention Act *mutatis mutandis* in its fraud prevention activities.

Aedifica does the same to ensure compliance with financial embargoes.

For this purpose, we may process data such as (among others) your name, first name, address, date and place of birth, nationality, profession, company number, identity card or passport number, expiration date of identity card or passport, politically exposed person (or family), entry on a sanctions list, and function/connection, copies of identity card or passport.

We collect this data based on our legitimate interest to prevent money laundering and terrorist financing and to prevent fraud.

5. Who has access to your personal data?

We do not share your personal data, unless with certain selected parties and only to the extent this is required for the purposes set out under section 4 of this Privacy Policy:

- our subsidiaries.
- certain selected service providers which render services for us in accordance with our instructions (e.g. professional advisors and attorneys, IT related service providers (including for services consisting of hosting the websites or the distribution of press releases), providers of recruitment related services, etc.). Aedifica provides services which may involve processing of personal data to some of its subsidiaries.

² The Belgian law of 18 September 2017 on the prevention of money-laundering, terrorist financing, and on the limitation of the use of cash, as amended from time to time.

- prospective acquirers in the event that Aedifica would sell all or a part of its business or assets.
- competent authorities when we have to transfer data on the basis of a legal obligation.

In such cases, we shall use our best efforts to ensure that the recipients of the data keep your information secure, take all reasonable steps to protect it from misuse and only use it in a manner consistent with our instructions, this Privacy Policy and applicable data protection laws and regulations.

We do not provide any personal data to other parties except when required by law, regulation or by court order, or required to protect the rights, property or safety of Aedifica group or its stakeholders (e.g. to conduct investigations into possible breaches of law, or to detect, prevent and protect against fraud and any technical or security vulnerabilities).

6. Do we transfer your personal data outside the European Economic Area?

In principle, Aedifica processes personal data for the purposes explained under section 4 of this Privacy Policy within the European Economic Area (EEA) and does not transfer or store your data outside the EEA.

We may however transfer your information to a destination outside the EEA, including subsidiaries outside the EEA (e.g. the United Kingdom), if that is appropriate (i) to achieve any of the purposes set out under section 4 and/or (ii) to disclose your information to a third party in accordance with this Privacy Policy.

If we transfer your information outside of the EEA, we will make sure that your information is protected by the following safeguards:

- the laws of the country to which your information is transferred ensure an adequate level of data protection, as for example is the case for the United Kingdom (Article 45 GDPR); or
- the transfer is subject to data protection clauses approved by the European Commission (Article 46.2 GDPR); or
- the transfer is based on Binding Corporate Rules (Article 47 GDPR); an approved Code of Conduct (Article 40 GDPR); an approved certification mechanism (Article 42 GDPR); an approved data transfer agreement (Article 46.3 GDPR); data protection clauses adopted by the Belgian data protection authority (Article 46.2 GDPR).

7. How do we protect your personal data?

We have implemented a number of security features throughout our website and software systems in order to protect your personal data from destruction, loss, modification or any other unauthorised processing. Note however that the confidentiality of any communication or material transmitted to or from us or any other party via websites or email cannot be guaranteed. We accept no responsibility or liability for the security of information transmitted via these methods.

All information you provide to us is stored on our secure servers, that may only be accessed by a limited number of persons holding special access rights and who undertake to respect and maintain its confidential nature.

8. How long do we keep your personal data?

The information we hold about you will be retained in a manner consistent with the applicable data protection legislation. We do not store your personal data for longer than necessary for the purposes for which it is stored, unless:

- the retention is necessary to protect the interest of Aedifica (e.g. in connection with any actual or potential dispute, in which case Aedifica retains the information until the end of the applicable prescription period); and/or
- the retention is necessary to comply with any legal or regulatory obligation (e.g. for tax or accounting purposes), in which case we will keep your information for as long as required by that obligation.

9. How can you exercise your rights?

You have the right to request free access to the personal data processed by Aedifica, to request the correction or removal of your data or to request a restriction of the processing. You may also request the portability of your data and you may object to the processing of your personal data, without substantiation in the case of direct marketing, or substantiated in other cases. Please note that the applicable legislation may impose conditions on exercising the above rights.

When the processing of your personal data is based on your consent, you may withdraw this at any time. Withdrawal of your consent does not affect the lawfulness of the processing based on consent before withdrawal.

You can direct your request to Aedifica based on the above rights to dataprotection@aedifica.be or by mail to the address mentioned below. Please include a copy of your identity card to help us prevent unauthorised individuals from accessing,

changing or deleting your information. We cannot handle your request without proof of your identity.

We will respond to your request as soon as practically possible. If we need more than one month (from receipt of your request) to respond to your request, we will let you know.

You also have the right to file a complaint with the supervisory authority, which is the Belgian Data Protection Authority. It can be reached by mail at Rue de la Presse 35, 1000 Brussels, and by e-mail at the following address: contact@apd-gba.be.

10. How can you contact us?

If you have further questions about this website or about this Privacy Policy, you may also contact us:

- by e-mail at dataprotection@aedifica.eu;
- by mail at Aedifica SA, Belliardstraat/Rue Belliard 40 (box 11), 1040 Brussels (Belgium); or
- by phone at +32 2 626 07 70.