

CUSTODIAN PROPERTY INCOME REIT PLC
EXTERNAL PRIVACY NOTICE

This notice applies to you if we process your personal information and you are not an officer, employee or worker of ours, or a prospective candidate employee or worker of ours.

You may be, for example, be an investor in one of our investment funds, an individual that works at an investor in one of our investment funds, a tenant at a property that we own or an individual that works for one of our tenants, an individual that works at a supplier of ours or another organisation that we deal with, an attendee at one of our events, a user of our website, an individual whose images are captured on a CCTV system we operate or a shareholder of ours or an individual who is affected by our activities or otherwise has a relationship with us.

References to **you**, **your** and **yourself** in this privacy notice are to either you as an individual or any organisation that you work for.

References to **we**, **our** or **us** in this privacy notice are to the **Custodian Property Income REIT Plc** a public limited company incorporated in England and Wales. Registered Number: 08863271. Registered Office: 1 New Walk Place, Leicester, United Kingdom, LE1 6RU.

For the purposes of data protection we will be the controller of any of your personal information.

The Investment Manager's Data Protection Officer has overall responsibility for data protection compliance in our organisation. Contact details are set out in the "**Contacting us**" section at the end of this privacy notice.

We are committed to respecting your privacy. This notice is to explain how we may use personal information we collect before, during and after your relationship with us. This notice explains how we comply with the law on data protection and what your rights are.

Please note that not all parts or content of this privacy notice may relate to you, as this will depend on your relationship with us. For example aspects only relevant to an investor would not apply to a contact at a supplier of ours, provisions relating to CCTV would not apply to you unless you visit premises where we operate CCTV, aspects relevant to users of our website would not apply to you unless you visit our website. However some parts of this privacy notice will always apply to you, for example the section on your rights and how to make a complaint.

1. PERSONAL INFORMATION WE MAY COLLECT

We may collect the following types of personal information about you:

- **Contact details:** information that allows us to identify and contact you directly such as your name, address email address, telephone number and addresses.
- **Identification information:** official identification details, information from a third party money laundering check provider, Companies House information, national insurance number, membership of relevant schemes.
- **Identification documents:** such as passport, utility bills, identity cards, etc.
- **Tax or other government identifiers:** such as your national insurance number.
- **Investment information:** including funds you wish to or have invested in, amounts invested, financial returns from investments.
- **Shareholder related information:** including information about shares you hold, dividend payments and votes cast.
- **Details of your work history:** this may include positions, roles, responsibilities, professional qualifications.
- **Personal history and information:** this may include hobbies, interests, marital status, family details and dietary requirements.
- **Advisors appointed by you:** including lawyers, accountants, financial advisors, planning consultants, surveyors, consultants and other advisors.

- **Business information:** including property owned by you, transactions, amounts paid or owed and tenants.
- **Property information:** including property you rent from us, rental information, service charge information and payment history.
- **Responses to surveys, competitions and promotions:** we keep records of any surveys you respond to or your entry into any competition or promotion we run.
- **Creditworthiness:** we may undertake investigations into your creditworthiness in order to establish whether to enter into or continue a business relationship with you or the organisation you work for.
- **Details of your performance:** when working with or for us or in relation to any project or work we are engaged in.
- **CCTV images:** if you visit any of our premises which has areas covered by our CCTV system.
- **Your usage of any IT systems we make available to visitors to our premises or properties we own:** for example usage of our internet and Wi-Fi facilities.
- **How you use our website:** we collect information about the pages you look at and how you use them, usernames and passwords and the devices used.
- **IP address information:** your computer's IP address allows us to track your usage of our website.
- **Details of the correspondence (including e-mail correspondence) you send and receive from us and details of any claims:** this includes letters and emails, SMS, MMS and other electronic communication and may in some cases include audio recording of telephone conversations.
- **Your marketing preferences:** so that we know whether and how we should contact you and what is most likely to interest you.
- **Subscription information:** for example when you subscribe to one of our blogs, mailing lists or other materials.
- **Videos, photographs and audio recordings:** which you or other people take and provide to us or we take ourselves, for example where a video conference is recorded.

2. SPECIAL CATEGORIES OF PERSONAL INFORMATION

We do not generally collect, store and use the following "special categories" of more sensitive personal information regarding you:

- information about your race or ethnicity, religious beliefs, sexual orientation and political opinions;
- information about your trade union memberships;
- information about your health, including any medical condition, health and sickness records, medical records and health professional information; and
- biometric information about you, for example fingerprints, retina scans.

If we do collect any special category personal information, we do not currently rely on consent as a basis for processing special category personal information.

We will also generally not collect, store and use any criminal records information in relation to you. If we do collect any criminal records information, we do not currently rely on consent as a basis for processing criminal records information.

3. SOURCES WE MAY COLLECT YOUR PERSONAL INFORMATION FROM

We will collect personal information from a number of sources. These may include the following:

- **Directly from you:** when you indicate that you may wish to make an investment, during the management of investments for your, if you attend an event, if you are involved in a

supply relationship with us, complete forms we provide to you, use our website, enter our competitions and promotions, make a claim, make a complaint, provide money laundering information to us contact us by phone, email or communicate with us directly in some other way or you enter an area covered by a CCTV system we operate.

- **Your landlord:** such as a property company, head landlord or housing association.
- **From referrals and recommendations:** usually given by other people who know you or have a working relationship with you.
- **Our website:** provides us with information about how you use it and the devices that you use to connect to our website.
- **Providers of information:** which may include professional bodies or trade associations, credit reference agencies, money laundering check provider, Companies House, the Land Registry, LinkedIn and other web platforms.
- **Journalists or other investigators:** they may provide us with details or make enquires about you or matters concerning you or ourselves.
- **Your employer or the organisation you work for:** they may provide us with your name, position contact details and background information about you.
- **Our professional advisors:** such as lawyers, accountants, financial advisors, planning consultants, surveyors, consultants and other advisors.
- **Your professional advisors:** such as lawyers, accountants, financial advisors, planning consultants, surveyors, consultants and other advisors.
- **Law enforcement:** such as the police, courts and security services.
- **Relevant regulators:** for example the Information Commissioner's Office, the London Stock Exchange, the Financial Conduct Authority or Companies House.
- **The Government and local authorities:** for example to assist with investigations, or in connection with applications e.g. involving HMRC, a local authority.

We will also collect additional personal information about you throughout the period of any relationship we have with you.

If you are providing information regarding other individuals to us, it is your responsibility to ensure that you have the right to provide the information to us.

If you are providing us with details about other individuals they have a right to know and to be aware of what personal information we hold about them, how we collect it and how we use and may share that information. Please share this privacy notice with those of them whom you feel are sufficiently mature to understand it. They also have the same rights as set out in the “**Your rights in relation to personal information**” section below.

4. **WHAT WE MAY USE YOUR PERSONAL INFORMATION FOR**

The points below describes the main purposes for which we may process your personal information. Which will apply will depend upon the nature of your relationship and interactions with us.

- **Carrying out identity and credit checks:** this will be where we have a legal obligation to do so or we may enter into or are already in a trading relationship with you.
- **Anti-money laundering checks:** where we are legally obliged to carry out these checks on you, particularly where you are looking to or have invested in any of our funds.
- **Enter into and perform contracts:** where we may be supplying products/services to you or an organisation you work for and/or you or an organisation you work for may be supplying products/services to us or we may be involved in similar arrangements with third parties.
- **Manage our relationship with you or the organisation you work for:** this will cover our day to day dealings with you or the organisation you work for.

- **Deal with your queries or complaints, claims, legal disputes or raise queries, claims, legal disputes or complaints with you or the organisation you work for:** where either you or the organisation you work for raise such matters or we need to raise such matters with you or the organisation you work for.
- **Maintain and improve our services and/or products:** we are always looking to improve our services, products and business and we may use your personal information to help us achieve the levels of service we aspire to and to improve them.
- **Data analytics, statistical analysis and other research:** this may be to help us better understand our investors, the markets in which we operate, our online services (e.g. our website).
- **Security of our IT systems:** where we provide IT related services to you (e.g. our website, wi-fi or internet access) then we need to keep those systems safe and secure and may use your personal information to do this.
- **Training:** we may use some of your personal information as case studies or in training.
- **Direct marketing:** we may use your personal information to send you marketing materials that may be of interest to you, generally this will only be where you are a potential or actual investor in our funds and generally only where we have your consent to do so.
- **Holding events:** we may hold events which you are invited to attend, and in these cases we may process your personal information so that you can attend and to
- **To comply with our legal and regulatory obligations:** we may have legal obligations to use your personal information in a particular way, e.g. a HMRC investigation or to account for and pay VAT or we may be subject to a regulatory obligation, e.g. rules issued by the Financial Conduct Authority.
- **To operate and manage our business and internal reporting:** we will need to process your personal information in the operation and management of our business, which may include internal reporting, where it is relevant for us to do so.
- **Storage of records relating to you and also records relating to our business:** we like every business need to keep records, and this will include general business records and also records which are specific to any relationship we have with you.
- **Operation and monitoring of our CCTV systems:** if you visit any premises or properties of ours then they may have CCTV systems in and around them and they may therefore capture images of you.
- **To prevent and detect criminal or improper acts (including CCTV):** we have legal, regulatory and moral obligations to make sure legal and regulatory requirements are upheld, and we may process relevant personal information about you in order to achieve this, and this will also include any personal information captured by any CCTV systems that we operate.
- **Business continuity:** we may keep duplicate backups, especially of electronic personal information, to protect us and allow quicker recovery from any issues which may threaten our business continuity.

For some of your personal information you may have a legal, contractual or other requirement or obligation for you to provide us with your personal information. If you do not provide us with the requested personal information we may not be able to properly perform our contract with you or the organisation you represent or comply with legal obligations and we may have to terminate our relationship. For other personal information you may not be under an obligation to provide it to us, but if you do not provide it then we may not be able to properly perform our arrangements with you or the organisation you represent.

Where you have given us your consent to use your personal information in a particular manner, you have the right to withdraw this consent at any time, which you may do by contacting us as described in the “**Contacting us**” section below. We will generally only ask for your consent for direct marketing.

Please note however that the withdrawal of your consent will not affect any use of your personal information made before you withdrew your consent and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on bases other than your consent.

We may anonymise and aggregate any of the personal information we hold about you (so that it does not directly identify you). We may use anonymised and aggregated information for purposes that include testing our IT systems, research, data analysis, improving our site and developing new products and services.

5. OUR LAWFUL BASES FOR PROCESSING YOUR PERSONAL INFORMATION?

We will only use your personal information when the law allows us to. This means we must have one or more legal bases to use your personal information. Most of these will be self-explanatory. The most common legal bases which will apply to our use of your personal information are set out below:

- Where we need to perform the contract we have entered into with you which covers your relationship with us or to take steps to enter into that contract. This will apply to you if you are an investor with us or a supplier to us.
- Where we need to comply with a legal obligation which applies to us, for example complying with health and safety laws for visitors, money laundering laws, financial regulation that applies to our activities.
- Where it is necessary for legitimate interests pursued by us or a third party and your interests and fundamental rights do not override those interests. This for example would cover use of your personal information if you work for a supplier of ours, and we need to use your details to contact the supplier you work for. Legitimate interests also covers most CCTV systems as it is a legitimate interest to protect against crime and other misconduct. It is also a legitimate interest to carry out marketing activities, though we generally ask for your permission before we send you any marketing materials.
- Where you have given your consent. Generally we do not rely on or need your consent for almost all uses we make of your personal information.

Where we are processing any sensitive special category personal information about you (which covers personal information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data, data concerning health or data concerning your sex life or sexual orientation) then we also need to have one or more of the following legal bases for using your personal information.

- Where we have your explicit consent to do so.
- Where it is necessary for us to comply with our obligations and exercising our rights in the field of employment law, social security law and social protection law.
- Where we need to protect your vital interests (or someone else's vital interests).
- Where you have already made public the personal information.
- In establishing, exercising or defending legal claims, whether those claims are against us or by us.
- Where it is necessary in the public interest.

We will not usually process any of these types of special category personal information about you, and in any cases where we do process special category personal information about you it will generally be to comply with legal obligations, where you have given your consent or in establishing, exercising or defending legal claims. In some cases more than one legal bases may apply to our use of your personal information.

In the event we process criminal records information about you, then we will either do so either to comply with our legal obligations or with your consent.

6. WHO WE MAY SHARE YOUR PERSONAL INFORMATION WITH

We may share personal information with the following third parties:

- **Advisors appointed by you:** for example any financial advisors, lawyers, surveyors or other professional advisors appointed by you or acting for you.
- **Anyone you ask us to pass your information to:** for example they might be relatives of yours or people you have given authority to so they can act on your behalf.
- **Other companies that we outsource to:** for example in relation to management of funds, payment of funds, collection of funds, property management companies
- **Other companies in our supply chain:** for example so that they can contact you about any issues in the supply chain or where your personal information is relevant to a sub-contractor or party above us in the supply chain.
- **Credit reference and other identification agencies:** for example so that we can assess your creditworthiness and to verify your identity. These agencies may retain a footprint that a search has been undertaken.
- **Third parties who ask for or want referrals:** for example we may provide your details to a third party who is seeking services/products which are the same or similar to those that you provide.
- **Marketing and public relations companies:** for example to help us to develop, carry out and assess marketing and PR campaigns
- **Other service providers and advisors to us:** for example such as companies that support our IT, help us analyse the data we hold, process payments, send communications to our customers, provide us with legal, property or financial advice and generally help us deliver our products and services to you or the organisation that you represent or for us to purchase them from you or the organisation you represent or who may operate a CCTV system on our behalf.
- **Information providers:** which may include credit reference agencies, money laundering check providers, Companies House, the Land Registry.
- **Purchasers of our business:** buyers or prospective buyers to whom we sell or negotiate to sell our business or parts of our business.
- **Relevant regulators:** for example the Information Commissioner's Office, the London Stock Exchange, the Financial Conduct Authority or Companies House.
- **The Government and local authorities:** where we are required to do so by law, for example HMRC, or to assist with investigations, for example the Information Commissioner's Office or the Financial Conduct Authority.
- **Police, law enforcement agencies and security services:** to assist with the investigation and prevention of crime and the protection of national security.

We may provide third parties with aggregate statistical information and analytics about users of our products and services so they can produce reports, but we will make sure no one can be identified from this information before we disclose it.

We do not disclose personal information to anyone else except as set out above unless we have your consent or we are legally permitted to do so. We do not sell, rent or trade your data.

7. TRANSFERRING YOUR PERSONAL INFORMATION INTERNATIONALLY

[The personal information we collect is not transferred to and stored in countries outside of the UK and the EEA.]

In limited circumstances the people to whom we may disclose personal information as mentioned in the “**Who we share your personal information with**” section above may be located outside of the UK and European Union. In these cases we will impose any legally required protections to the personal information as required by law before it is disclosed.

If you require more details on the arrangements for any of the above then please contact us using the details in the “**Contacting us**” section below.

8. HOW LONG DO WE KEEP PERSONAL INFORMATION FOR

We will keep your personal information for as long as is necessary for the purpose for which it has been obtained and then for as long as there is any risk of a potential claim, which will be dependent upon the limitation period for the particular type of claim. We have set out below the main retention periods which will apply:

- For individual contacts at investors and suppliers this will be for as long as we continue to have a relationship with that investor or supplier and then for a period of 6 years afterwards.
- For website users it will generally be a period of 2 years after you used our website.
- For individuals seeking information, making complaints or otherwise corresponding with us it will generally be 6 years after the end of our dealings with you.
- For individuals attending an event it will generally be a period of 3 years after the event.
- For individuals whose images are captured on a CCTV system operated by us it will generally be up to 30 days (after that time the recording media is generally overwritten) unless a request for access to the relevant CCTV images has been made to us during that period, in which case the relevant CCTV images will be retained for as long as they remain relevant. In the case of investigations, e.g. a criminal prosecution, that may be many years

It is important to ensure that the personal information we hold about you is accurate and up-to-date, and you should let us know if anything changes, for example if you move position or work for a different organisation or change your phone number or email address. you can contact us by using the details set out in the “**Contacting us**” section below.

9. SECURITY

We have numerous security measures in place to protect the loss, misuse and alteration of personal information under our control, such as passwords and firewalls. We cannot, however, guarantee that these measures will protect your personal information, however we do take all reasonable measures to protect your personal information. We do take data security very seriously and will use all reasonable endeavours to protect the integrity and security of any personal information we collect about you.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those of our staff, agents, contractors and other third parties working on our behalf 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.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

You should take all reasonable steps to keep your personal information secure, including choosing a secure password if you have an online account with us and not disclosing your passwords or username to anybody else.

10. YOUR RIGHTS IN RELATION TO YOUR PERSONAL INFORMATION

You have the following rights in relation to your personal information:

- The right to withdraw any consent you have given to us in relation to our use of your personal information;
- the right to be informed about how your personal information is being used;
- the right to access the personal information we hold about you;
- the right to request the correction of inaccurate personal information we hold about you;
- the right to request the erasure of your personal information in certain limited circumstances;

- the right to restrict processing of your personal information where certain requirements are met;
- the right to object to the processing of your personal information;
- the right to object to us sending you direct marketing materials;
- the right to request that we transfer elements of your personal information either to you or another service provider in certain circumstances; and
- the right to object to certain automated decision making processes using your personal information.

You should note that some of these rights, for example the right to require us to transfer your personal information to another service provider or the right to object to automated decision making, may not apply as they have specific requirements and exemptions which apply to them and they may not apply to personal information recorded and stored by us. For example we do not use automated decision making in relation to your personal information. However some of your rights have no conditions attached, so your right to withdraw consent or object to processing for direct marketing are absolute rights.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal information or to exercise any of your other rights. This is an appropriate security measure to ensure that personal information is not disclosed to any person or influenced by any person who has no right to do so.

Whilst this privacy notice sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner's Office website at <https://ico.org.uk/for-the-public/>.

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details set out in the "**Contacting us**" section below.

If you are unhappy with the way we are using your personal information you can also complain to the UK Information Commissioner's Office or your local data protection regulator. For complaints to the Information Commissioner's Office then please see <https://ico.org.uk/make-a-complaint/>. However we are here to help and encourage you to contact us to resolve your complaint first.

11. **CHANGES TO THIS NOTICE**

We may update this privacy notice from time to time. When we change this notice in a material way, we will update the version date at the bottom of this notice. For significant changes to this notice we will try to give you reasonable notice unless we are prevented from doing so. Where required by law we will seek your consent to changes in the way we use your personal information.

12. **CONTACTING US**

In the event of any query or complaint in connection with the information we hold about you, please email info@custodiancapital.com or write to us at 1 New Walk Place, Leicester, LE1 6RU.