

## **Ground Rents Income Fund plc - Website Privacy Notice**

### **PRIVACY POLICY**

#### **Introduction**

Ground Rents Income Fund plc respects your privacy and is committed to protecting your personal data.

This privacy notice explains what information we collect from you or you provide to us, how we use it and with whom we share that information and tells you about your privacy rights and how the law protects you. In this privacy policy, Ground Rents Income Fund plc and our subsidiaries are referred to as "GRIO", "us", "we" and "our".

#### **1. Important information and who we are**

This privacy notice aims to give you information on how GRIO collects and processes your personal data in the course of our everyday business, including any data we collect in our capacity as landlord or that you may provide through this website when you register or sign up to our alerts, or through your contact with us.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

GRIO is the data controller and responsible for your personal data. We use certain third parties to manage our website, investor relations and properties. These third parties are our data processors under the data protection law and we are responsible for them under that law. You may contact GRIO by email at [info@groundrentsincomefund.com](mailto:info@groundrentsincomefund.com) or by letter addressed to Ground Rents Income Fund plc, 1 London Wall Place, London, EC2Y 5AU.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance using the contact details provided above.

#### **2. Changes to the privacy notice and your right to inform us of changes**

This privacy policy may change from time to time to reflect changes in applicable laws or changes in our use of data. We will notify you of any material changes. This policy was last updated in July 2019.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

### 3. **Third-party links**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

### 4. **The data we collect about you**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

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

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes address, email address and telephone numbers.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Usage Data** includes information about how you use our website and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our service providers and your communication preferences.

With regards to our tenants we collect your name, correspondence address, address of the property in question and a contact email address, together with transactional information (payments made, copy demands sent and statements).

We do not collect personal information relating to children. If you have reason to believe that a child under the age of 16 has provided personal information to GRIO, please contact us and we will delete that information from our databases.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

You are not obliged to provide us with your personal data where it is requested but we may be unable to provide certain services or proceed with your business relationship with GRIO if you do not do so.

## 5. How is your personal data collected?

GRIO collects information from individuals through use of our website, website sign ups (for example, registering for email alerts) and when individuals contact us directly.

GRIO also collects information about tenants either from the sellers of properties or in the course of our day to day conduct as a landlord.

We use different methods to collect data from and about you including:

- **Direct interactions.** You may give us your Identity, Contact and Marketing and Communications Data by registering on our website or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - request information to be sent to you;
  - register for alerts; or
  - give us some feedback or other information.
- **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 data by using cookies and other similar technologies. Please see the cookie policy below for further details.
- Other information comes from:
  - application forms or other materials you or your authorised representative submits to them during the course of your relationship with GRIO;
  - your or your authorised representative's interactions with GRIO, transactions and use of our products and services (including the use of any our website);
  - your or your authorised representative's business dealings with GRIO including via email, telephone or as stated in contracts with you;
  - depending on the products or services you or your authorised representative requires, third parties (including for credit and money laundering checks, among other things); and
  - recording and monitoring tools that they use for compliance or security purposes (e.g. recording of telephone calls, monitoring emails, etc.).

## 6. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Where you have positively opted in to receive email alerts and related communications from us, we will rely on consent as a legal basis for processing your personal data. You have the right to withdraw consent to such communications at any time by contacting us.

## 7. Purposes for which we will use your personal data

In our capacity as a property owner we use your personal data for the purpose of collecting ground rent due under the terms of leases, such processing is necessary for performance of a contract with you as an individual.

We have set out below, in a table format, a description of all the other ways we plan to use your personal data, and of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To manage our relationship with you, which will include: (a) Processing your application to use our services, e.g. email alerts (b) Notifying you about changes to our terms or privacy policy (c) Informing you of GRIO events related to your interests	(a) Identity (b) Contact (c) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated, to engage with our stakeholders and to study how you use our products/services)
To administer and protect our business, data and website (including troubleshooting, data analysis, testing, system maintenance, support, reporting)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business

and hosting of data)		reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content to you and measure or understand the effectiveness of our messages to you	(a) Identity (b) Contact (c) Marketing and Communications (d) Technical	Necessary for our legitimate interests (to study how stakeholders use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, services, marketing, stakeholder relationships and experiences	(a) Technical (b) Usage (c) Marketing and Communications	Necessary for our legitimate interests (to define types of individuals with an interest in us, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)

## 8. Glossary of terms used in the table above

**Legitimate Interest** means our interest in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

## 9. Automated processing

We do not carry out automated decision-making or profiling using your personal data.

## 10. Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Marketing and Communications Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services and offers may

be relevant for you (we call this marketing).

You will receive GRIIO marketing communications from us if you have requested information from us or if you registered for a related email alert and, in each case, you have not opted out of receiving that marketing.

### **Opting out**

You can ask us to stop sending you marketing messages at any time by unchecking relevant boxes to adjust your marketing preferences or by following the opt-out links on any marketing message sent to you or by contacting us at any time.

## **11. Cookies**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see the cookie policy below.

## **12. Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **13. Sharing your personal data**

We will not share your personal data with third parties unless (i) you have consented to this, (ii) it is necessary to enable us to provide our services to you or (iii) it is necessary to allow us to comply with our legal or regulatory obligations, as discussed below.

The following categories of recipients may receive your personal information and process it for the purposes outlined in this Privacy Policy:

- third parties such as service providers of GRIIO, auditors, regulatory authorities and technology providers, agents, contractors, service providers or related companies (including payment processors) if this is necessary to administer your investment in GRIIO, respond to your enquiries or for any other related purposes;
- any regulatory, supervisory or governmental authorities to the extent we are required by law to do so, or in other limited circumstances (for example if required

by a court order or regulatory authority, or if we believe that such action is necessary to prevent fraud;

- tax authorities.

#### **14. Disclosures of your personal data**

In certain circumstances, we may be legally required to share certain data held by us, which may include your personal data, for example where we are complying with legal obligations, a court order, or a governmental authority.

We may have to share your personal data with third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

#### **15. International transfers**

We may transfer personal data that we collect from you to third party data processors, vendors or hosting partners acting on our behalf located in countries outside of the European Economic Area ("**EEA**") or to other entities in our group of companies in connection with the purposes set out above. We will only transfer your personal information outside the EEA where either the transfer is to a country which the EU Commission has decided ensures an adequate level of protection for your personal information, or we have put in place adequate safeguards as required by applicable data protection law.

#### **16. Data security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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

#### **17. Data retention**

**How long will you use my personal data for?**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances you can ask us to delete your data. See below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## 18. Other

**This Privacy Policy is for your information and should not be used as the basis for any decision to purchase or redeem investments in the Company. The views and information expressed in this policy do not constitute and may not be relied upon as constituting any form of investment advice or inducement to invest, and prospective investors must obtain appropriate independent professional advice before making investment decisions.**

## 19. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. At any time you may:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular



situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us.

### **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

