

OLIM PROPERTY LIMITED

PRIVACY POLICY

OLIM Property Limited (the "**Company**"), (together "**OLIM Property**", "**we**", "**us**" or "**our**") is committed to safeguarding information provided to us by any third parties ("**you**") (including our clients and all visitors to the website www.olimproperty.co.uk) from which any individual can be identified, such as names, contact details and personal data ("**Personal Information**").

1. IMPORTANT INFORMATION

This privacy policy aims to give you information on how OLIM Property collects and processes your personal data as a controller of data where it is supplied by you:

- in connection with client investment management agreements with the Company;
- by sending us correspondence; and/or
- providing us with products and/or services.

In addition, it outlines your data protection rights under the EU data protection regime introduced by the General Data Protection Regulation (Regulation 2016/679) (the "**GDPR**").

Please contact the Compliance Officer, OLIM Property Limited, 15 Queen Anne's Gate, London SW1H 9 BU if you have any queries in relation to the processing of your personal information under this policy.

2. CATEGORIES OF DATA SUBJECTS

(A) CLIENTS

The kind of information we hold about you

Although you engage with us as a professional, or representative of an institutional investor, we are still likely to receive some personal data. We may hold such personal information which is provided by you directly (for example by completing application forms, telephone calls and/or corresponding with us), or which is provided to us by third parties. We may also process personal data about individuals that are connected with our institutional clients (for example directors, trustees, employees, representatives, beneficiaries, shareholders, investors, beneficial owners or agents).

In connection with our institutional mandates, we may collect, store and use the following categories of personal information about you: contact details (including name, title, address, telephone number, personal email address), your date of birth, copies of passport, driving licence and utility bills (for anti-money laundering purposes), national insurance number, bank account details, job title, place of work and qualifications.

Public databases – we may obtain information about individuals from public databases, or company websites. We use reputable sources including public repositories. We employ appropriate measures to assure the quality of information which we collect.

How we will use information about you

Your personal data may be processed by OLIM Property or its sub-processors (or any of their affiliates, agents, delegates or sub-contractors) for the following purposes:

- (a) to fulfil investment mandates for the institutional investors you represent;
- (b) to allow us to administer and manage our investment mandates as necessary to comply with applicable laws and/or in our legitimate interest;
- (c) to update and maintain records for the Company, including maintaining statutory registers, which are necessary to comply with the Company's legal obligations;
- (d) to confirm your identity;
- (e) to carry out anti-money laundering checks and other actions in an attempt to detect, prevent, investigate and prosecute fraud and crime, which OLIM Property considers necessary for compliance with its legal obligations, for the performance of a task being carried out in the public interest and/ or to pursue OLIM Property's legitimate interests (including for the prevention of fraud, money laundering, sanctions, terrorist financing, bribery, corruption and tax evasion);
- (f) to prepare tax related information in order to report to tax authorities in compliance with a legal obligation to which OLIM Property is subject;
- (g) to scan and monitor emails sent to us (including attachments) for viruses or malicious software, to process and encrypt personal data to protect and manage email traffic, and to store personal data on our systems to pursue our legitimate interests including for document retention purposes; and
- (h) such other actions as are necessary to manage the activities and/or to comply with the legal obligations of OLIM Property, including by processing instructions and enforcing or defending the rights and/or interests of OLIM Property, in order to comply with our legal obligations and/or to pursue our legitimate interests.

To ensure that we provide you with the best service possible, we may use and store your personal data and/or the personal data of individual contacts at your organisation as well as keeping records of our conversations and meetings.

Basis on which we process your data and your right to withdraw consent

Where such processing is being carried out on the basis that it is necessary to pursue OLIM Property's legitimate interests, such legitimate interests are not overridden by your interests, fundamental rights or freedoms.

OLIM Property do not anticipate being required to obtain your consent for the processing of your personal data as listed above. If OLIM Property wishes to use your personal data for other purposes which do require your consent, OLIM Property will contact you to request this.

(B) BUSINESS CONTACTS

The following section of this policy sets out how OLIM Property may process personal data (as a controller) about its business contacts and (current, previous and/or potential) service providers (and employees of service providers) and data subjects that have provided a business card to, or have corresponded with OLIM Property.

The kind of information we hold about you

We may collect, use, store and transfer different kinds of personal data about you which you provide to us including: name, date of birth, address, email address, telephone numbers, place of work, qualification and job title.

Public databases – we may obtain information about individuals from public databases, or company websites. We use reputable sources including public repositories. We employ appropriate measures to assure the quality of information which we collect.

How we will use information about you

We will use your personal data in the following circumstances: where it is necessary for our legitimate interests, or those of a third party (including in relation to the sending of electronic marketing communications) and where your interests and fundamental rights are not overridden or where we need to comply with a legal or regulatory obligation.

Your personal data may be processed by OLIM Property or its sub-processors (or any of their affiliates, agents, delegates or sub-contractors) for the following purposes:

- to hold your personal data on our system and to contact you on the basis of the legitimate interests of OLIM Property (including in connection with using the services that you provide);
- in respect of suppliers, to allow us to process payments and orders in respect of any goods and services provided;
- to send you electronic marketing communications;
- to comply with legal or regulatory requirements;

- to scan and monitor emails sent to us (including attachments) for viruses or malicious software, to process and encrypt personal data to protect and manage email traffic, and to store personal data on our systems to pursue our legitimate interests including for document retention purposes; and
- such other actions as are necessary to manage the activities and/or to comply with the legal obligations of OLIM Property, including by processing instructions and enforcing or defending the rights and/or interests of OLIM Property, in order to comply with our legal obligations and/or to pursue our legitimate interests.

We may share your personal data with our professional advisers such as accountants, lawyers or other consultants.

In addition, it may be necessary to disclose your Personal Information in order to comply with any legal obligation (such as anti-money laundering or anti-terrorist financing obligations), carry out an internal investigation, or protect the rights, or safety of OLIM Property staff. This includes exchanging information with other companies and organisations for the purposes of fraud protection and prevention.

Basis on which we process your data and right to withdraw consent

If we consider it necessary to obtain your consent in relation to the use your personal data, we will contact you to request this consent. In such circumstances, we will provide you with full details of the personal data that we would like and the reason we need it, so that you can carefully consider whether you wish to consent.

You have the right to withdraw your consent at any time, although that will not affect the lawfulness of processes based on consent before its withdrawal.

To withdraw your consent, or to opt out of receiving marketing communication, please contact us at OLIM Property Limited, 15 Queen Anne's Gate, London SW1H 9BU or following the unsubscribe instructions included in each electronic marketing communication.

Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Where such processing is being carried out on the basis that it is necessary to pursue OLIM Property's legitimate interests, such legitimate interests do not override your interests, fundamental rights or freedoms.

(C) STAFF AND JOB APPLICANTS

The kind of information we hold about you

If you submit an application for a job with us we will store personal data relating to you. Depending on how far your application progresses, this might include your contact details, your relevant education and employment history, details of referees and information you provide in your CV. Further information may be generated by us later on, such as notes of interviews.

We may gather further personal data before deciding whether to make you a final offer such as proof of your identity, proof of your qualifications, pre-employment health questionnaires and credit checks.

If you apply for a role that must be approved by the Financial Conduct Authority, we may obtain details of any relevant criminal or disciplinary history as part of that approval process.

Most of the personal data that we process about you when you apply for a job is information that you give us directly or is generated through the recruitment exercise, although we may gather information from recruitment agencies, your referees and credit reference agencies. We may in certain circumstances need to seek confirmation from the Home Office that you have the right to work in the UK.

Our staff may also give us emergency contact information as part of our emergency planning and may give us details of their dependents and of other people in relation to their employee benefit arrangements.

If you were put down by a Staff member as a next of kin or dependent, we will store your personal data to ensure the personnel records of the Staff member are correct and disclose your information to the relevant benefits provider.

The personal data described above is processed by us pursuant to our legitimate interests as an employer.

Public databases – we may obtain information about individuals from public databases, or company websites. We use reputable sources including public repositories. We employ appropriate measures to assure the quality of information which we collect.

How we will use information about you

We use your personal data to contact you about your application and to assess your experience and suitability for a job with us, to help us assess your training needs and understand your characteristics and working-style.

We may process special categories of data to ensure that we can comply with our legal or regulatory obligations as an employer, such as details of your right to work in the UK, information about your health (in order to assess whether you are medically able to carry out the work offered and whether any adjustments would be needed to your work environment), information provided as evidence of entitlement to statutory leave and

pay, for example sick pay, maternity, paternity, adoption, parental and shared paternal leave, information about a disability (in order to assess the reasonable adjustments needed to your potential work environment), details of your relevant criminal or disciplinary history (to ensure full disclosure is made to the Financial Conduct Authority).

We may process information about your health for the purposes of occupational medicine, in order to assess your medical capacity to perform the job you have applied for. We may also need to process personal data in order to exercise our legal rights and bring, or defend claims.

Some of our service providers who act as our processors could have access to your personal data such as our auditors, IT consultants or payroll providers. In addition, we may share your personal data with recruitment and credit reference agencies and, in some circumstances, the Financial Conduct Authority, who act as separate controllers of your personal data.

If you are employed by us, our privacy policy will apply to your personal data.

Basis on which we process your data and your right to withdraw consent

If we consider it necessary to obtain your consent in relation to the use of your personal data, we will contact you to request this consent. In such circumstances, we will provide you with full details of the personal data that we would like and the reason we need it, so that you can carefully consider whether you wish to consent.

You have the right to withdraw your consent at any time, although that will not affect the lawfulness of processes based on consent before its withdrawal.

To withdraw your consent, or to opt out of receiving marketing communication, please contact us at OLIM Property Limited, 15 Queen Anne's Gate, London SW1H 9BU or follow the unsubscribe instructions included in each electronic marketing communication.

Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Where such processing is being carried out on the basis that it is necessary to pursue OLIM Property's legitimate interests, such legitimate interests do not override your interests, fundamental rights or freedoms.

(D) TENANTS OF CLIENTS

The kind of information we hold about you

Where you are a tenant of one of our client's buildings we may hold personal data such as name, date of birth, address, email address, telephone numbers, qualification, job title and bank account details.

Public databases – we may also obtain information about you from public databases, or company websites. We use reputable sources including public repositories. We employ appropriate measures to assure the quality of information which we collect.

How we will use information about you

We may use your information so that we can assess your suitability to be a tenant.

We may share your personal information with any third party that purchases, or intends to purchase, one or more of our client properties.

We will use your information for such actions as are necessary to manage the activities and/or to comply with the legal obligations of OLIM Property, including by processing instructions and enforcing or defending the rights and/or interests of OLIM Property, in order to comply with our legal or regulatory obligations and/or to pursue our legitimate interests.

We may share your personal data with our professional advisers such as accountants, lawyers or other consultants.

Basis on which we process your data and your right to withdraw consent

If we consider it necessary to obtain your consent in relation to the use of your personal data, we will contact you to request this consent. In such circumstances, we will provide you with full details of the personal data that we would like and the reason we need it, so that you can carefully consider whether you wish to consent.

You have the right to withdraw your consent at any time, although that will not affect the lawfulness of processes based on consent before its withdrawal.

To withdraw your consent, or to opt out of receiving marketing communication, please contact us at OLIM Property Limited, 15 Queen Anne's Gate, London SW1H 9BU or following the unsubscribe instructions included in each electronic marketing communication.

Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Where such processing is being carried out on the basis that it is necessary to pursue OLIM Property's legitimate interests, such legitimate interests do not override your interests, fundamental rights or freedoms.

3. DISCLOSURES OF YOUR PERSONAL DATA

We will not disclose personal information we hold about you to any third party except as set out below.

We may disclose your personal data to third parties including the following:

- tax, audit, regulatory bodies or other authorities, when we believe in good faith that the law or other regulation requires us to share this data (for example, because of a request by a tax authority, in connection with any anticipated litigation, or in compliance with our legal and regulatory obligations);
- third party service providers (including Suppliers) who perform functions on our behalf (including benefit providers such as pension providers and private medical insurance external consultants, business associates and professional advisers such as lawyers, auditors and accountants, transport and distribution suppliers, technical support functions and IT consultants carrying out testing and development work on our business technology systems);
- third party outsourced IT and document storage providers where we have an appropriate processing agreement (or similar protections) in place.

These third parties will be subject to confidentiality requirements and they will only use your personal information as described in this Privacy Policy.

4. RETENTION OR PERSONAL INFORMATION

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.

If you send us an enquiry, we will hold your data until the enquiry has been completed and no further response is received for a reasonable period.

If you subscribe to our marketing mailings we will keep your data until you tell us you no longer wish to receive them.

If you make a complaint, we will retain your data for a period of up to six years after resolution of the complaint.

If you apply for a job with us and your application does not result in us employing you we will delete all the personal data gathered during the recruitment exercise six months

after the recruitment exercise has ended so that we can defend any legal claims arising from the recruitment process.

If you engage with us on behalf of client we will retain your data for up to 10 years after the date on which we cease to provide services to the client.

If you are a business contact we will keep your data until you tell us that you no longer wish to hear from us or our relationship is ended.

If you are a supplier, we will keep your data until 6 years after our contractual relationship ends.

5. INTERNATIONAL TRANSFERS

We do not transfer your personal data outside the European Economic Area (EEA).

However, some of the external service providers used by us may process your personal data and have operations or use IT services in countries outside the EEA.

Whenever your personal data is transferred out of the EEA by us, we ensure (or require that our service providers ensure) a similar degree of protection is afforded to it by ensuring that appropriate safeguards as required by applicable law, are in place.

6. DATA SECURITY

We have put in place what we consider to be appropriate technical and operational measures against unlawful or unauthorised processing of personal data we hold, and against the accidental loss of, disclosure, or damage to, personal data.

We also 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.

We aim to ensure that the level of security and measures adopted to protect your personal data are appropriate for the risks presented by the nature and use of your personal data. We follow recognised industry practices for protecting our IT environment and physical facilities.

If you suspect any misuse or loss of or unauthorised access to your personal data please let us know immediately by contacting the Compliance Officer at OLIM Property Limited, 15 Queen Anne's Gate, London SW1H 9BU.

7. YOUR LEGAL RIGHTS

In certain circumstances, by law you have the right to:

- Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below).
- Object to processing of your personal information 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. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy, or the reason for processing it. Please note that there may be circumstances where you ask us to restrict our processing of your personal information, but we are legally entitled to refuse that request.
- Request the transfer of your personal information to another party.
- Withdraw your consent. If we are processing your personal data on the basis of your consent, you have the right to withdraw such consent at any time. Withdrawing your consent will not affect the lawfulness of processes based on consent before its withdrawal. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

If you wish to exercise any of the rights set out above, please contact the Compliance Officer at OLIM Property Limited, 15 Queen Anne's Gate, London SW1H 9BU in writing.

Generally 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.

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.

We try to respond to all legitimate requests within one month. Occasionally an extension of up to 2 months may be taken if your request is particularly complex, or you have made a number of requests. In this case, we will notify you within the first month, explain why the extension is required and keep you updated.

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). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.

8. CHANGES TO THIS PRIVACY NOTICE

We may update this privacy notice from time to time, and will communicate such updates on our website.

9. HOW TO CONTACT US

If you have any queries about this policy or your personal data, or you wish to submit an access request, or raise a complaint about the way your personal data has been handled, please do so in writing and address this to the Compliance Officer at OLIM Property Limited, 15 Queen Anne's Gate, London SW1H 9BU.

OLIM Property Limited is registered in England & Wales (registered number 07696904) and its registered office address is 15 Queen Anne's Gate, London SW1H 9BU.

30 September 2018