VALUE AND INDEXED PROPERTY INCOME TRUST PLC

PRIVACY POLICY

Value and Indexed Property Income Trust PLC (the **"Company"**, **"VIP"**, "**we**", "**us**" or "**our**") is committed to protecting the privacy of individuals whose data it processes ("**you**" or "**your**").

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1. IMPORTANT INFORMATION AND WHO WE ARE

VIP is committed to protecting the privacy and security of personal data which is entrusted to it.

This privacy policy aims to give you information on how VIP collects and processes your personal data as a controller of data supplied by shareholders and potential investors in connection with holdings and/or investing in the Company; by sending us correspondence; and/or providing us with products and/or service.

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 Chairman, Value and Indexed Property Income Trust PLC, c/o Maven Capital Partners UK LLP, Kintyre House, 205 West George Street, Glasgow, Scotland G2 2LW if you have any queries in relation to the processing of your personal data under this policy.

2. CATEGORIES OF DATA SUBJECTS

(A) INVESTORS

The kind of information we hold about you

We may hold personal data about investors in the Company which is provided to us by you directly as a result of your holding and/or investment in the Company (by completing application forms, telephone calls and/or corresponding with us) or which is provided to us by third parties including OLIM Property Limited (as Managers of the Company) and Maven Capital Partners UK LLP (as Secretary of the Company). We may also process personal data about individuals that are connected with you as an investor (for example directors, trustees, employees, representatives, beneficiaries, shareholders, investors, clients, beneficial owners or agents).

In connection with your holding and/or investment in the Company, 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 licences and utility bills (for anti-money laundering purposes), national insurance number, bank account details and details relating to your investment activity.

How we will use information about you

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

(a) to provide you with information on VIP (including performance updates), which is being carried out to pursue VIP's legitimate interests;

(b) to allow us to administer and manage your holding in the Company which are necessary for the Company to comply with applicable laws and/or in its legitimate interest;

(c) to update and maintain records for the Company, including maintaining statutory registers, which is necessary to comply with the Company's legal obligations;

(d) to carry out anti-money laundering checks and other actions in an attempt to detect, prevent, investigate and prosecute fraud and crime, which VIP 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 VIP's legitimate interests (including for the prevention of fraud, money laundering, sanctions, terrorist financing, bribery, corruption and tax evasion);

(e) to prepare tax related information in order to report to tax authorities in compliance with a legal obligation to which VIP is subject;

(f) 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

(g) such other actions as are necessary to manage the activities and/or to comply with the legal obligations of VIP, including by processing instructions and enforcing or defending the rights and/or interests of VIP, in order to comply with our legal obligations and/or to pursue our legitimate interests.

Basis on which we process your data

Where such processing is being carried out on the basis that it is necessary to pursue VIP's legitimate interests, such legitimate interests are not overridden by your interests, fundamental rights or freedoms. Such processing may include the use of your personal data for the purposes of sending you electronic marketing communication, in relation to which you can at any time unsubscribe by following the instructions contained in each marketing communication.

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

(B) BUSINESS CONTACTS

The following section of this policy sets out how VIP 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 VIP.

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 and job title.

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 VIP 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 VIP (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 updates on the performance of the Company, newsletters, invitations to events and other 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 VIP, including by processing instructions and enforcing or defending the rights and/or interests of VIP, in order to comply with our legal obligations and/or to pursue our legitimate interests.

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 (such as for sending emails to individuals that have not invested in the Company), 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. If you decide to provide your 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 Value and Indexed Property Income Trust PLC, c/o Maven Capital Partners UK LLP, Kintyre House, 205 West George Street, Glasgow, Scotland G2 2LW 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 VIP's legitimate interests, such legitimate interests do not override your interests, fundamental rights or freedoms. Such processing may include the use of your personal data for the purposes of sending you electronic marketing communication, in relation to which you can at any time subscribe by following the instructions contained in each marketing communication.

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 the Board of the Company, to third parties who are providing services to us, including IT service providers, event management, PR and marketing service providers, background and/or credit reference services, processors of the Company (including printers, registrars, administrators), telephone service providers, document storage providers and backup and disaster recovery service providers.

We may also disclose personal data we hold to third parties:

(a) in the event that we sell any business or assets, in which case we may disclose personal data we hold about you to the prospective and actual buyer of such business or assets; and/or

(b) if we are permitted by law to disclose your personal data to that third party or are under a legal obligation to disclose your personal data to that third party.

4. DATA RETENTION

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.

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 be based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data 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 security measures against unlawful or unauthorised processing of personal data we hold, and against the accidental loss of, 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.

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.

- 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. To withdraw your consent or to opt out of receiving marketing communication, please contact us at Value and Indexed Property Income Trust PLC, c/o Maven Capital Partners UK LLP, Kintyre House, 205 West George Street, Glasgow, Scotland G2 2LW 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.

If you wish to exercise any of the rights set out above, please contact Value and Indexed Property Income Trust PLC, c/o Maven Capital Partners UK LLP, Kintyre House, 205 West George Street, Glasgow, Scotland G2 2LW in writing.

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, 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.

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 associated page on the OLIM Property Limited website.

9. FURTHER INFORMATION

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 Chairman of Value and Indexed Property Income Trust PLC, c/o Maven Capital Partners UK LLP, Kintyre House, 205 West George Street, Glasgow, Scotland G2 2LW or by email to CoSec@mavencp.com.

Value and Indexed Property Income Trust PLC is a public limited company registered in Scotland (registered number SC050366) and its registered office address is c/o Maven Capital Partners UK LLP, Kintyre House, 205 West George Street, Glasgow, Scotland G2 2LW.

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Data Protection and Privacy Policy

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