

## PRIVACY POLICY

Care Property Invest NV, a Public Regulated Real Estate Company whose registered office is located at Horstebaan 3, 2900 Schoten, Belgium, with company number 0456.378.070 (hereafter **CP Invest, the Company, we or us**), is committed to protecting and respecting your privacy.

This Privacy Policy sets out the basis on which any personal information we collect from you, or that is provided by you, will be processed by us. Please read the following carefully to understand our views and practices regarding your information and how we will use it.

By using our website ([www.carepropertyinvest.be](http://www.carepropertyinvest.be)) (hereafter **our website**) and/or our services, you are accepting and agreeing to the practices described in this Privacy Policy.

CP Invest foresees an internal privacy policy in which she further explains her point of views and practices concerning personal information to her staff members.

CP Invest can modify this Privacy Policy to, for example, meet new legal, contractual or administrative obligations. Please consult our website regularly to find the most recent version of our Privacy Policy.

This Privacy Policy was last updated on 15 January 2019.

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## 1. Definitions

**Personal information:** all information about an identified or identifiable natural person ('the involved'); identifiable is considered as a natural person who can be identified directly or indirectly, mainly by an identifier such as a name, an identification number, location information, an online identifier or by one or more elements that are characteristic for the physical, physiological, genetical, psychic, economic, cultural or social identity of that natural person.

**Processing:** an adaptation or a whole of adaptations concerning personal information or a whole of personal information, whether or not executed through automated procedures, such as collecting, registering, ordering, structuring, saving, updating or modifying, requesting, consulting, using, providing through transmitting, dispersing or providing in other ways, aligning or combining, guarding, deleting or destroying of information.

## 2. Information we collect from you

### (I) Directly identifiable information

Personal information that Care Property Invest collect and processes about you concerns only information that you provide us through i.a.:

- Filling out forms on our website
- Corresponding with us by phone, email or otherwise
- Subscribing to our press release service
- Asking CP Invest a question through an online contact form
- Filling out a statement on inside information

The information that you provide us includes, without any limitations: name, address, date of birth, national registration number, email, telephone number and financial information.

### (II) Indirectly identifiable information

During each of your visits to our website we could automatically collect the following information:

- technical information, including the Internet Protocol (IP) address used to connect your computer to the internet;
- browser type and version, time zone setting, browser plug-in types and versions;
- the operating system and the platform;
- your device ID;
- information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our website (including date and time), products/services you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page;
- and any phone number used to call our employees.

The information that we collect from you, is stored, used and protected in correspondance with:

- the Belgian law of 30 June 2018 concerning the protection of natural persons concerning the processing of personal information;
- the Regulation 2016/679 of the European Parliament and the Council concerning the protection of natural persons with reference to the processing of personal information and concerning the free movement of those informations, and the repealing of Directive 95/46/EG (General Data Protection Regulation) (GDPR), and all corresponding or equivalent national legislation or regulations in Belgium;

in either case as in force and as applicable and as modified, supplemented or replaced from time to time (hereafter collectively named "**General Data Protection Regulation**").

### 3. Uses made of your information

We use the information we hold about you for i.a. the following purposes:

- Carrying out our obligations arising from any contracts entered into between you and us;
- Meeting the legal requirements (such as conducting a company secretariat and complying to the rules of inside information)
- Providing you with the information and services that you request from us;
- Reviewing and assessing your job application;
- Providing you with information about goods or services we feel may interest you;
- Notifying you about changes to our services

### 4. Legal basis

Your information is being collected and processed based on i.a. the following legal bases:

- If it is necessary for performing the contract we have with you;
- If it is necessary to fulfill a legal requirement that is applicable to us (e.g. keeping an insiders list);
- If it is necessary for pursuing our legitimate interests, considering these interests are not overridden by your fundamental rights and freedoms, we will use your information to know your preferences, to better personalize our product offerings, to prevent fraud and to secure our website; or
- When you consented to this (e.g. if you have given your prior express consent thereto we may use your email address for sending you marketing materials).

### 5. Disclosure of your information

Care Property Invest only shares your information, for as far as this is required, for the purposes and legal basis as described in section 3 and 4 of this Privacy Policy, with:

- our affiliates/other entities within the CP Invest group;
- public authorities (including FSMA and judicial and police authorities);
- banks and insurers;
- our professional advisors (e.g. attorneys, internal and external auditors);
- providers of recruitment related services;
- our suppliers of IT related services;
- our suppliers of marketing related services (e.g. press release service through Mailchimp);
- analytics and search engine providers that could assist us in the improvement and optimisation of our site (e.g. Google).

We will also disclose your information to third parties:

- in the event that we sell or buy any business or assets, in which case we may disclose your information to the prospective seller or buyer of such business or assets;
- if CP Invest or substantially all of its assets are acquired by a third party, in which case information about its customers may be one of the transferred assets;
- if we are under a duty to disclose or share your information in order to comply with any legal obligation or to protect the rights, property, or safety of CP Invest, our customers, or others. This includes exchanging information with public authorities (including judicial and police authorities) in the event of, for example, a cyber security incident;
- if that is appropriate to achieve any of the purposes set out in section 3 of this Privacy Policy.

## 6. Transfer of your information outside the EEA

We may transfer your information to a destination outside the European Economic Area (the EEA), if that is appropriate (i) to achieve any of the purposes set out under section 3 and/or (ii) to disclose your information to a third party in accordance with section 5 of this Privacy Policy.

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

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

If you wish to receive more information relating to the transfers of your information and/or the safeguards that have been implemented (including on how to receive a copy thereof), you can contact us through the contact details set out in section 14 below.

## 7. Your rights

You have certain rights regarding the information we hold about you. These rights can be exercised by contacting us as set out below:

- you have the right to view the information we keep about you – this is because we want you to be aware of the information we have about you and to enable you to verify whether we process your information in accordance with the applicable data protection laws and regulations;
- you have the right, under certain circumstances, to block or suppress further use of your information. When the processing is restricted, we can still store your information, but we can no longer use it;
- if your information is inaccurate or incomplete, you have the right to request the rectification of your information;
- you have the right, under certain circumstances, to request the deletion or removal of your information from our systems;
- you have the right to lodge a complaint about the way we handle or process your information with your supervisory authority;
- if our processing of your personal information is based specifically on your consent, you have the right to withdraw that consent at any time. This includes your right to withdraw consent to our use of your information for direct marketing purposes;
- you have the right to obtain from us, under certain circumstances, your information in a structured and commonly used form so you can reuse it for your own purposes across different services. For example: if you want to work with a different service provider, this enables you to move your information easily and in a secure manner to this new service provider.

You also have the right to object to certain types of processing, including processing for direct marketing purposes.

However, note that we may need to retain certain information, for example for legal or administrative purposes (e.g. keeping of accounting records or insiders list).

For all requests set out above, please send us an email with “data privacy request” in the subject line and include a copy of your identity card or another proof of your identity (e.g. driver’s license) to help us prevent unauthorised

individuals from accessing, changing or deleting your information. We will respond to your request as soon as practically possible. If we need more than one month (from receipt of your request) to respond to your request, we will come back to you and let you know.

8. Security of collected information

We have implemented a number of security features throughout our website in order to prevent the unauthorized release of or access to collected and/or received information. We have endeavored to create a secure and reliable website for you, but note that the confidentiality of any communication or material transmitted to or from us or any other party via our website or email cannot be guaranteed. We accept no responsibility or liability for the security of information transmitted via these methods.

All information you provide to us is stored on our secure servers to which only a select number of people have access to. They have special access rights and they commit themselves to take into account and maintain its confidential nature.

Where we would have given you (or where you would have chosen) a password which enables you to access certain parts of our server and/or website, you are responsible for keeping this password confidential. We ask you not to share this password with anyone.

9. Retention of your information

The information we hold about you will be retained in a manner consistent with the applicable data protection legislation. In any event, your information shall not be kept longer than is necessary to achieve the purposes stated in this Privacy Policy.

10. What happens when you do not provide us the requested information or when you ask us to stop the processing of your information?

Our possibility (I) to fulfil our obligations from this agreement with you, (II) to provide the necessary pieces or (III) to fulfil the legal obligations that apply to you, sometimes depends on the possibility to have access to and to use certain informations about you. Should you not supply us with the requested information or should you ask us to cease the processing of your information, this could mean that we break one or multiple legal or contractual obligations.

11. External websites

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

12. Automated decision making

We do not use your information for any kind of automated decision making.

13. Agreement with collection and use of your information – changes to our Privacy Policy

By using this website or using our services, you acknowledge that you have read the terms of this Privacy Policy and that you agree with the collection and the use of your information as set out above.

We may amend this Privacy Policy from time to time. Any changes we make to our Privacy Policy in the future will be posted on this page and, where appropriate, notified to you by email. Please check back frequently to see any updates or changes to the Privacy Policy. Your continued use of this website and/or our services following the posting of changes to this Privacy Policy will indicate your acceptance of these changes.

14. Contact details

Questions, comments and requests regarding the Privacy Policy must be addressed to Mr. Willem Van Gaver, reachable by telephone on the general phone number of CP Invest (03 222 94 94) or by e-mail ([privacy@carepropertyinvest.be](mailto:privacy@carepropertyinvest.be)) or by regular mail (Horstebaan 3, 2900 Schoten).