

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 and/or its subsidiaries (hereafter **CP Invest, the Company, we or us**), is committed to protecting and respecting your privacy.

This Privacy Policy is the basis for which all personal data we collect from you or that you provide to us will be processed by us. Please read the text below carefully in order to fully understand our vision and practices regarding your data and how we will use that data.

By using our website (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 it further explains its point of views and practices concerning personal information to her staff members.

CP Invest may update this Privacy Policy to, for example, comply with new legal, contractual or administrative obligations, or because of new features on our website. Please check our website regularly to find the most recent version of our Privacy Policy.

This Privacy Policy was last updated on 30 June 2023.

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1. Definitions

Personal data: any information relating to an identified or identifiable natural person ('data subject'); identifiable is considered to be 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 set of adaptations concerning personal data or a set of personal data, whether or not executed through automated procedures, such as collecting, registering, organisation, structuring, storage, updating or modifying, retrieval, consulting, using, disclosure by transmission, 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 collects 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 data.

(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;
- data relating to 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 data that we collect from you, is stored, used and protected in correspondence with:

- the Belgian law of 30 June 2018 concerning the protection of natural persons concerning the processing of personal data;
- the Regulation 2016/679 of the European Parliament and the Council concerning the protection of natural persons with reference to the processing of personal data and concerning the free movement of those data, 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**').

Uses made of your data

We use your data for, inter alia, the following purposes:

- a) *In the course of our day-to-day business operations and management*

CP Invest processes your personal data in the course of carrying out its day-to-day business activities. For this purpose, we may process data such as your contact details, position, company, authority to represent a company, address, email address and bank account number.

This processing may, inter alia, be in the context of fulfilling our obligations resulting from agreements we have concluded with you, or to comply with our legal obligations (such as running the company/corporate secretariat and complying with insider trading rules).

b) *To inform you of our activities and investments*

CP Invest processes your personal data when you request us to be informed of CP Invest's latest investment information, namely in order to:

- inform you about goods and services in which we believe you might be interested;
- notify you of changes to our services.

As the case may be, we process this information based on your consent or on our legitimate interest to inform our shareholders about our activities. If the processing of your personal data is based on your consent, you may of course withdraw your consent at any time.

- c) *To answer your queries*
- d) *To contact you as part of a selection and recruitment process*
- e) *To secure our office building*
- f) *To comply with legal obligations*

3. Legal basis

Your data are 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, within the framework of shareholder management,...);
- 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 personalise our product offerings, to prevent fraud and to secure our website; or
- if you have consented to this (e.g. if you have given your prior express consent, we may use your e-mail address to send you investment information, such as our annual report or press releases relating to investments, or in the context of answering your questions asked of us).

4. 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 or subsidiaries 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);

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;
- in the course of carrying out our day-to-day business activities (namely, for this purpose we may process data such as your email address, mobile phone number, job title).

- 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 or an anti-fraud security incident;
- if that is appropriate to achieve any of the purposes set out in section 3 of this Privacy Policy.

5. 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 standard contractual clauses as published in the 'European Commission Decision of 4 June 2021'; 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.

6. Your rights

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

- you have the **right to view** the data we keep about you – this is because we want you to be aware of the data we have about you and to enable you to verify whether we process your data 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 data**. When the processing is restricted, we can still store your data, but we can no longer use it;
- if your data are inaccurate or incomplete, you have the **right to request the adaptation of your data**;
- you have the **right**, under certain circumstances, to request the **deletion or removal of your data** from our systems;
- you have the **right to file 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 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 mentioned above, please send us an e-mail with 'data privacy request' in the subject line. Always make sure it is clear exactly which right you wish to exercise and in which way you wish to receive the information (e.g. by mail, post, telephone,...). Please note that in certain cases we will need more information (e.g. a copy of your identity card or driving licence), so that we can check that we are helping the right person and in this way you will also help us to prevent unauthorised access, modification or deletion of your data.

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.

You also have the right to file a complaint with the supervisory authority, namely the Belgian Data Protection Authority:

- by post: Drukpersstraat 35, 1000 Brussels
- by mail: contact@apd-gba.be

7. Security of collected data

We have implemented a number of security features throughout our website in order to prevent the unauthorised release of or access to collected and/or received data. 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.

8. Retention of your data

The data we hold about you will be kept in a manner consistent with applicable data protection legislation. In no case will your data be kept for longer than necessary to achieve the purposes set out in this Privacy Policy, unless:

- the retention is necessary to protect CP Invest's interests (for example, in connection with an existing or potential dispute, in which case CP Invest will retain the information until the end of the applicable limitation period) and/or;
- the retention is necessary to comply with a legal or regulatory obligation (for example, for tax or accounting purposes), in which case we will retain your information for as long as required by that obligation.

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

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 data about you. Should you not supply us with the requested data or should you ask us to cease the processing of your data, this could mean that we break one or multiple legal or contractual obligations.

10. 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 utilised 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 data to these websites and/or applications

11. Automated decision-making/processing of your personal data

We do not use your data for any automated decision-making/processing based on your data, except when you enter CP Invest's office building and you pass by our surveillance cameras. Such information is processed in accordance with applicable data protection rules in general and applicable camera legislation in particular.

12. 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.

13. 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) or
- by regular mail (Horstebaan 3, 2900 Schoten).