

Information according to Art. 13, 14 EU General Data Protection Regulation (EU-GDPR)

With this information, we inform you as a business partner, service provider or interested party about the processing of your personal data and the rights to which you are entitled under data protection law. Which data is processed in detail and how it is used depends largely on the type of business relationship or service. Therefore, not all parts of this information will apply to you. Please also pass on the information to current and future authorised representatives and beneficial owners as well as any co-obligated persons.

Contact data of the controller:

ECE Real Estate Partners S.à r.l.
19, rue Edmond Reuter
L-5326 Contern
LUXEMBOURG

Contact data of the data protection officer:

ECE Real Estate Partners S.à r.l.
19, rue Edmond Reuter
L-5326 Contern
LUXEMBOURG

email: ferman.ciftci@ece.com

Data Processing purposes and legal bases:

We process personal data in accordance with the provisions of the European Data Protection Regulation (EU-GDPR) and the Luxembourg Act of 1 August 2018:

a.) For the fulfilment of contractual obligations (Art. 6 para. 1 b EU-GDPR)

The processing of data is carried out for the purpose of implementing the contractual relationship or for the implementation of pre-contractual measures. Further details on the data processing purposes can be found in the relevant contractual documents including the corresponding annexes. In the context of the performance of the contract, ECE may also be subject to certain legal obligations for the fulfilment of which the processing of personal data is necessary. We process your personal data (especially your professional contact data) in particular to contact you and for further communication with you or your company.

b.) Based on your consent (Art. 6 para. 1 a EU-GDPR)

Insofar as you have given us consent to process personal data for specific purposes, the lawfulness of this processing is based on your consent. Consent given can be revoked at any time. The revocation of consent does not affect the lawfulness of the data processed until the revocation. Such consents concern e.g.:

- participation in surveys
- registration and logins to ECE websites
- the sending of newsletters
- information about invitations to events.

c.) Within the framework of the balancing of interests (Art. 6 para. 1 f EU-GDPR)

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In addition, we also process your data on the basis of Art. 6 para 1 f EU-GDPR, insofar as this is necessary to protect the legitimate interests of our company or third parties and the interests or fundamental rights and freedoms of the data subject, which require the protection of personal data, are not overridden.

Examples:

- Assertion of legal claims and defence in legal disputes.
- ensuring IT security and IT operations
- the digital or postal dispatch of greeting cards to business partners, for example at Christmas or on the occasion of a company anniversary
- the postal dispatch of brochures and flyers to business partners to inform them about current topics
- passing on data in the ECE companies, e.g. in our contact management system
- identifying contact persons in publicly accessible sources
- technical data of electronic communication and data exchange (e.g. log data)
- Consultation of and data exchange with credit agencies
- for the determination of creditworthiness or default risks, protection of the assets of the person responsible as well as the assets of the third party companies represented by the person responsible
- Intra-group data transfer to meet legal and regulatory group requirements for internal audit, accounting, fraud and crime detection and prevention, contract processing and expediting if you are a business partner of another group company, business management and service development and customer surveys.

d.) Due to legal requirements (Art. 6 para. 1 c EU-GDPR)

We also process your personal data in order to fulfil our legal obligations, e.g.:

- due to regulatory requirements or when comparing your data with so-called sanctions lists in order to comply with legal provisions on combating terrorism (e.g. EU Regulation 2580/2001).
- to fulfil the obligations arising from the Money Laundering Act in the form of the collection of personal data of the business partner (insofar as they are natural persons), the beneficial owner (including trustees), representatives, appearing persons and contact persons; name, address, nationality, date/place of birth, height, eye colour, sex, contact data and identification data (e.g. ID card data) are collected insofar as this is required in detail by law or is necessary for the identification of the person by virtue of the law.
- To fulfil the obligations arising from tax laws (fulfilment of control and reporting obligations under tax law as well as the assessment and management of tax risks in the ECE Group).

Data from other sources:

Furthermore, we also process - insofar as it is necessary for the fulfilment of the contract or pre-contractual measures or you or your client/employer have given a consent - personal data that we have received from affiliated companies of ECE and other third parties in a permissible manner (e.g. credit agencies).

From publicly accessible sources (e.g. authorities, Internet) we only process personal data if this is legally permissible, for example because it is necessary for the provision of our services or you or your client/employer have consented to this.

Data categories:

<i>Title</i>	<i>Scope</i>	<i>Author / Department</i>	<i>Version</i>	<i>Date</i>	<i>Page</i>
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We process - in individual cases depending on the type of contract/consent - the categories of data listed below:

Master data, address and contact data, rental data, financial data, ID data, billing data, contract data, technical data and communication data.

Recipients:

Depending on the type of contract/consent or a legal obligation, your data may be passed on to third parties in individual cases.

These may be the following addresses:

a) Contractual partners

From the areas of: Marketing, newsletters, security, IT services, communications, credit services, printing services, telecommunications, public authorities, financial sector, insurance sector, intra-group companies.

b) Public authorities and institutions

e.g.:

- Financial authorities, law enforcement authorities in the event of a legal or official obligation or
- Credit and financial service institutions or comparable institutions to which we transmit personal data in order to carry out the business relationship with you (e.g. banks, depending on the contract).

Data transfer to third countries

ECE uses service providers for certain tasks, some of which in turn use sub-service providers. If these service providers or sub-service providers have their registered office, parent company or data centres in a so-called third country, your data may only be transferred in compliance with the requirements of Art. 44 et seq. of the EU-GDPR, in particular if the European Commission has decided that an adequate level of data protection exists in a third country (Art. 45 EU-GDPR). If the Commission has not taken such a decision, the ECE or the service provider may only transfer personal data to a third country or to an international organisation provided that appropriate safeguards are in place (e.g. standard data protection clauses adopted by the Commission or the supervisory authority in a specific procedure) and enforceable rights and effective remedies are available.

Duration of storage:

For the performance of a contract, on the basis of your consent or for the exercise of legitimate interests, your personal data will be stored. However, if you revoke your consent or object to the data processing in a legally effective manner, or if the purpose of processing has ceased to exist because the storage is no longer necessary for the fulfilment of our contractual and legal obligations, the data will be deleted on a regular basis, unless their - temporary - further storage for other purposes is provided for by law, such as:

- Fulfilment of retention obligations under commercial and tax law: These include the Luxembourg Law of 1915, the Law of 12 November 2004, the CSSF Regulation 12-02, etc.. The retention and documentation periods specified there are five to ten years.

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- Preservation of evidence within the framework of the statutory limitation provisions. According to § 2262 of the Luxembourg Civil Code, these limitation periods can be up to 30 years.

Rights of Data Subjects:

Every data subject has the right to information under Article 15 EU-GDPR, the right to rectification under Article 16 EU-GDPR, the right to erasure under Article 17 EU-GDPR, the right to restriction of processing under Article 18 EU-GDPR, the right to object under Article 21 EU-GDPR and the right to data portability under Article 20 EU-GDPR. In addition, there is a right of appeal to the competent data protection supervisory authority (Article 77 EU-GDPR). You can revoke your consent to the processing of personal data at any time. Please note that the revocation only takes effect for the future. Processing that took place before the revocation is not affected.

Moreover, you have the right, for reasons resulting from your special situation, to oppose at any time the processing of data concerning you which is made by virtue of Article 6 para 1 lit. e (performance of a task carried out in the public interest) or Article 6 para 1 lit. f EU-GDPR (legitimate interests of the controller); this also applies for any profiling based on these provisions. In this case we no longer process data concerning you unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or if the processing serves the establishment, exercise or defence of legal claims.

If any data concerning you are processed to carry out direct marketing, you have the right to oppose the processing of such data for marketing purposes at any time. If you oppose the processing for direct marketing purposes, such data are no longer processed for these purposes.

Please address any withdrawals to: ferman.ciftci@ece.com