

## **CONTROL UNION WEBSITE PRIVACY POLICY**

### **GENERAL**

This Privacy Policy details how Control Union processes any personal data collected or received when users visit our website <https://www.controlunion.com/> and is issued on behalf of the Control Union Group, so when we mention Control Union, “we”, “us” or “our”, in this Privacy Policy we are referring to the relevant company in the Control Union Group which is the controller responsible for processing your data. If you are not sure which member of the Control Union Group is responsible for processing your data, please contact us using the details below.

By accessing this Website, you consent to the collection, use and disclosure of your personal information as explained in this Privacy Policy. This Privacy Policy is designed to explain Control Union’s policies and procedures with respect to collection, use and disclosure by Control Union of personal information in connection with the Website. This Privacy Policy has a limited scope and applies only to the Website.

It is Control Union’s general policy to comply with the privacy legislation within each jurisdiction in which we operate. Privacy legislation or an individual’s right to privacy may differ from one jurisdiction to another. The rights and obligations described in this Privacy Policy may not apply to all individuals or in all jurisdictions. For information specific to residents of the United Kingdom or the European Union, please see the Information for UK/EU Residents section below.

### **HOW DO WE USE COOKIES?**

Cookies are small text files placed on your computer by websites you visit. They are widely used in order to make websites work, or work more efficiently, as well as provide information to the owners of the website. For further information on the cookies related to this Website, please go to <https://www.controlunion.com/cookie-policy/>

### **WHAT PERSONAL INFORMATION IS COLLECTED THROUGH THE WEBSITE?**

Control Union collects and maintains different types of personal information in connection with the Website, including:

contact and identification information, such as name, address, telephone number and email address;  
business relationship information, including information related to agreements, feedback and information requested or provided by or from you;

information related to your employment or application for employment, including your work and educational history;

information related to our media, investor and public relations activities.

### **HOW IS PERSONAL INFORMATION COLLECTED THROUGH THE WEBSITE?**

In general, you can visit the Website without telling us who you are or providing us with any personal information. There are portions of the Website where we may ask to collect personal information from you for a specific purpose, such as to provide you with information requested by you or carry out a transaction requested by you. You are not required to provide this personal information to us. However, if you choose not to, we may not be able to complete your requested transaction or provide you with the requested information.

We collect certain non-personal information about visitors to the Website, including the pages viewed, the links clicked, and other actions taken within the Website. We also collect certain standard information that your browser sends to every website you visit, such as your internet protocol (IP) address, your browser type and capabilities and language, your operating system, the date and time you access the website, and the referring website from which you linked to our Website. We also may utilise special electronic images or other objects embedded within the Website — sometimes referred to as web beacons or tracking pixels — to collect information that helps determine and analyse how you and other visitors use the Website. If you have provided

us with personal information through other means, we may connect your personal information with other information collected through our Website and use the combined information to help determine your potential interests in certain products, services or information and for other purposes described in this Privacy Policy.

Additionally, information related to your interactions with the Website may be collected and stored by us in small data files — commonly referred to as cookies — that are placed onto your device by our web servers. We may use temporary session cookies, which are terminated when you close your browser session, to store certain personal information you provide for purposes of administering that session and facilitating transactions requested by you during that session. We also may use persistent cookies, which remain saved on your device after your browser session is closed, to store non-personal information related to your interactions with the Website. Most Internet browsers automatically accept cookies, but you can usually modify your browser settings to decline cookies or to notify you when a cookie is being placed on your computer. Each browser is different, but generally users can remove cookies by following directions provided in the browser's "help" file. Please note that, if you reject cookies or disable cookies in your browser, some features of the Website may not work.

We may also obtain information about you that is transferred from or provided by third parties, such as those providing website analytics services or from other parties or services that link to or provide information for the Website.

#### **HOW DOES CONTROL UNION USE PERSONAL INFORMATION?**

Control Union collects personal information to enable us to manage and develop our business and operations, including:

to establish, maintain and manage relations with you so that we may provide you with, or receive from you, the information, products and services that have been requested;  
to improve our Website;

to improve our security measures;

to enable us to undertake our environmental, health and safety activities, including incident planning, response and investigation;

any other reasonable purpose to which you consent.

We use your personal information for the purposes described in this privacy policy and for any additional purposes for which we have obtained your consent to the use or disclosure of your personal information. Your consent may be implied, deemed (using an opt-out mechanism) or express. Express consent can be given orally, electronically or in writing. Implied consent is consent that can reasonably be inferred from your action or inaction.

We may use your personal information without your knowledge or consent where we are permitted or required by applicable law or regulatory requirements to do so.

We will never share, trade or sell your information to a third party for marketing purposes.

#### **HOW DOES CONTROL UNION DISCLOSE PERSONAL INFORMATION?**

We share your personal information with our employees, contractors, consultants and other parties who require such information to assist us with establishing, maintaining and managing our business relationship with you, including: third parties that provide services to us or on our behalf; third parties that collaborate with Control Union in the provision of services to you; and, third parties whose services we use to conduct our business.

In addition, personal information may be disclosed or transferred to another party in the event of a change in ownership of, or the grant of a security interest in, all or a part of Control Union or its affiliates through, for example, an asset or share sale, or some other form of business combination, merger, divestiture or joint venture, provided that such party is bound by appropriate agreements or obligations and required to use or

disclose your personal information in a manner consistent with the use and disclosure provisions of this privacy policy, unless you consent otherwise. Control Union or its affiliates may provide or continue to provide management, administrative and other services to the other party as part of a change in ownership, whether for a fixed period of time or indefinitely. In such case, your personal information would be used or disclosed in a manner consistent with the agreement between Control Union and the other party.

Further, personal information may be disclosed:

as permitted or required by applicable law or regulatory requirements, in which case, we will endeavour to not disclose more personal information than is required under the circumstances;  
to comply with valid legal processes such as search warrants, or court orders;  
to protect the rights and property of Control Union;

during emergency situations or where necessary to protect the health or safety of a person or group of persons or to protect the environment;

where the personal information is public; or

with your consent.

#### **HOW DOES CONTROL UNION PROTECT PERSONAL INFORMATION?**

Control Union endeavours to maintain adequate physical, procedural and technical security with respect to its offices and information storage facilities so as to prevent any loss, misuse, unauthorised access, disclosure, or modification of personal information.

As part of those precautions, Control Union endeavours to restrict access to personal information to those employees and others (i.e., individuals or organisations providing services to Control Union) that it determines need to know that information in order that Control Union may conduct its activities.

#### **HOW LONG DOES CONTROL UNION RETAIN PERSONAL INFORMATION?**

Control Union retains the personal information collected through the Website or otherwise in its possession for so long as it is needed for the purposes for which it was obtained or so long as allowed for any other lawful retention purpose, subject, in each case, to applicable law regarding data retention periods for personal information.

#### **HOW TO ACCESS AND UPDATE YOUR PERSONAL INFORMATION**

Control Union endeavours to ensure that any personal information in its possession is as accurate, current and complete as necessary for the purposes for which Control Union uses that information. If you want to review, verify or correct your personal information, please contact us using the contact information set out below. Please note that any such communication must be in writing.

When requesting access to your personal information, please note that we may request specific information from you to enable us to confirm your identity and right to access, as well as to search for and provide you with the personal information that we hold about you. If you require assistance in preparing your request, please contact us using the contact information set out below.

Your right to access the personal information that we hold about you is not absolute. For example, there are instances where your personal information may have been destroyed, erased or made anonymous. In addition, there are instances where applicable law or regulatory requirements allow or require us to refuse to provide some or all of the personal information that we hold about you. In the event that we cannot provide you with access to your personal information, we will endeavour to inform you of the reasons why, subject to any legal or regulatory restrictions.

To some extent, Control Union relies on individuals to update their own personal information. For example, if an individual has had a change of address or telephone number, the individual should complete the appropriate documentation and forward to the appropriate contact within Control Union requesting that the individual's file be updated. Unless an individual advises Control Union of these important changes, Control Union may have no way of knowing about them.

Control Union reserves the right not to change any personal information and instead append any alternative information the individual concerned believes is appropriate. For example, Control Union may not change certain information contained in a lease administration file but will attach a sheet to that file indicating the amendment requested by the individual.

### **INFORMATION FOR UK/EU RESIDENTS**

This section applies solely to residents of the United Kingdom ("UK") or the European Union ("EU") and controls to the extent of any conflict with any other provisions of this Privacy Policy.

We exercise our rights to collect, process and use your personally identifiable information under one or more of the following legal bases, as necessary:

to comply with any agreement or contract with you or at your request;

to comply with any applicable legal obligations;

for our business or other interests, unless otherwise restricted by the fundamental rights and freedoms related to the protection of your personally identifiable information; or  
for other data processing purposes authorised by member state or other law.

If we require processing of your personally identifiable information other than as set forth above, we will request your consent in accordance with applicable law.

Under applicable law, you may have certain rights, including:

**Right to request access:** You may have the right to obtain from us confirmation as to whether or not personally identifiable information concerning you is being processed, and, where that is the case, to request access to the information and the purposes of the processing, the categories of personal data concerned, the recipients or categories of recipient to whom the personal data have been or will be disclosed and, where possible, the planned period for which the data will be stored. You may also have the right to obtain a single copy of your personal data undergoing processing free of charge, with any other copies subject to a reasonable fee based on administrative costs. However, these rights to request access to information or copies of your personal data shall not adversely affect the rights and freedoms of others.

**Right to request rectification:** You may have the right to obtain from us without undue delay the rectification of inaccurate personal data concerning you. Taking into account the purposes of the processing, you may have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

**Right to request erasure ("be forgotten"):** You may have the right to obtain from us the erasure of personal data concerning you without undue delay, and we may have the obligation to erase such personal data without undue delay, in each case, where the conditions under applicable law apply, but subject to any exceptions under applicable law.

**Right to request restriction of processing:** You may have the right to obtain from us restriction of processing your personal data where the conditions under applicable law apply. Where applicable, such data shall, with the exception of storage, only be processed with your consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the EU or a member state.

**Right to request data portability:** You may have the right to receive the personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and you may have the right to transmit those data to another controller without hindrance from us, in each case, where the conditions under applicable law apply.

**Right to object:** You may have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you where the conditions under applicable law apply, including if related to direct marketing purposes or profiling to the extent related to such direct marketing, and where applicable, we shall no longer process the personal data unless we demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

**Right to avoid automated individual decision-making:** You may have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or significantly affects you, subject to the exceptions under applicable law.

**Right to withdraw consent:** To the extent your consent is or was required to process your personally identifiable information, you may withdraw such consent at any time with future effect, but this will not affect the lawfulness of the processing prior to the withdrawal.

To exercise your rights under applicable law, please contact us using the contact information set out below. Please note that any such communication must be in writing. If you are not satisfied with any response to your requests or have other unaddressed complaints or concerns, you have the right to complain to the relevant supervisory authority.

#### **OTHER MATTERS RELATED TO OUR WEBSITE**

This Privacy Policy does not apply to any website other than our Website. Our Website contains links to other websites that Control Union does not own, or control and we cannot be responsible for the privacy policies and practices of those websites. Similarly, we cannot be responsible for the privacy policies and practices of any website that links to our Website. We encourage you to read the privacy policies of each and every third party website and to be aware when you leave our Website.

By visiting our Website and communicating electronically with us, you consent to the processing and transfer of your personal information as set out in this Privacy Policy.

Personal information collected on our Website may be stored and processed in any country in which we maintain facilities. Personal information collected on our Website may be transferred among Control Union's various divisions and affiliated companies around the world, which may involve transfers from the UK or countries within the European Economic Area ("EEA") to countries outside the UK and EEA.

Such transfers inside or outside the UK or EEA may be subject to applicable governmental decisions or inter-governmental agreements, certification programs, or treaties regarding whether the transfer provides an adequate level of data protection from the perspective of the applicable data protection law.

Where such adequate level of data protection has not been determined pursuant to the foregoing, we will transfer the data using appropriate safeguards, including through the use of standard contractual clauses adopted by the EU. Personal information collected on our Website may be stored and processed by third-party service providers engaged by Control Union, which may store or process the information in any other country in which such parties maintain facilities or operations. By choosing to access our Website, you consent to any such transfer, storage or processing of personal data outside of your country.

This Privacy Policy does not create or confer upon any individual any rights or impose upon Control Union any rights or obligations outside of, or in addition to, any rights or obligations imposed by the privacy laws of such individual's jurisdiction, as applicable.

Should there be, in a specific case, any inconsistency between this Privacy Policy and the applicable privacy laws of such individual's jurisdiction, this Privacy Policy shall be interpreted, in respect of that case, to give effect to, and comply with, such privacy laws; provided, however, Control Union operates only within certain countries, states, territories, or jurisdictions, and it is Control Union's intent to comply with the privacy laws applicable to its operations in such jurisdictions, with no intent to establish operations in other jurisdictions merely because of the availability of or access to the Website in such other jurisdictions.

This Privacy Policy includes examples but is not intended to be restricted in its application to such examples, thus 'including' shall mean 'including without limitation'.

Our Website is a general audience website and a business website.

#### **REVISIONS TO THIS PRIVACY POLICY**

Control Union may from time to time make changes to this privacy policy to reflect changes in its legal or regulatory obligations or in the manner in which it deals with your personal information. We will post any revised version of this Privacy Policy on our Website <https://www.controlunion.com/>, and we encourage you to refer back to it on a regular basis. Any changes to this Privacy Policy will be effective from the time they are posted, provided that any change that relates to why we collect, use or disclose your personal information will not apply to you, where your consent is required to such collection, use or disclosure, until we have obtained your consent to such change.

#### **CONTACTING US**

If you have any questions about this Privacy Policy or our privacy practices, please contact our Data Privacy Advisor via the following email [privacy@controlunion.com](mailto:privacy@controlunion.com).

We reserve the right to monitor your communications with us whether by mail, voice, fax, email or any other form of transmission for the purposes of quality control, security and other business needs.