

Daiwa House Europe B.V.

Privacy Notice

Document background

This document is drafted in view of the obligations of companies under Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC ("**General Data Protection Regulation**" or "**GDPR**").

The GDPR applies to the processing of personal data:

- in the context of the activities of an establishment of a company (data controller or data processor) in the Union, regardless of whether the processing takes place in the Union or not; and
- of data subjects who are in the Union by a data controller or data processor not established in the Union, where the processing activities are related to: (a) the offering of goods or services, irrespective of whether a payment of the data subject is required, to such data subjects in the Union; or (b) the monitoring of their behaviour as far as their behaviour takes place within the Union.

This means that the GDPR applies to all of the processing of personal data by Daiwa House Europe B.V. ("DHE"), and potentially to processing activities carried out by other members of the Daiwa House group of companies, depending on the circumstances.

Document purpose and structure

Companies that operate in scope of the GDPR have a transparency obligation vis-à-vis the individuals whose personal data they process. This Privacy Notice describes how DHE collects, stores, uses, protects, transfers and deletes personal data of customers, suppliers, job applicants and website users.

This document is merely a starting point and is to be completed based on the factual processing operations carried out by DHE.

Governance

This document is subject to DHE's review, it should be revised and updated according to developments and facts.

Nothing stated in this document is meant to contradict to any other applicable (data privacy) laws, regulations or policies and procedures currently implemented by the Daiwa House group of companies.

Daiwa House Europe B.V.

Privacy Notice

Date of last revision: 04032022

1. Introduction

Daiwa House Europe B.V. ("DHE", "we", "us", "our") and affiliated companies is committed to safeguarding your personal data ("you", "your"). DHE fully recognizes the importance of protecting personal data. The proper use and protection of this information not only forms the basis of our business activities, but also represent key areas of our social responsibility.

This Privacy Notice informs you about how we collect, store, use, protect, transfer and delete your personal data, in accordance with our GDPR Privacy Policy, and applicable data protection laws, specifically the General Data Protection Regulation ("GDPR"). We explain the activities we process your personal data for including the legal basis for doing so and describe how data is shared with other parties as well as the processing of personal data outside the European Economic Area (EEA). We have also detailed your rights as a data subject and how you can exercise your rights.

This Privacy Notice may be amended from time to time. The latest version is available on our website.

It is important that you read this notice carefully, so you are aware of how and why we collect and use your data. If you have any concerns or questions that cannot be answered by this Privacy Notice, please contact us by using our contact details listed under the '**How to contact us?**' section below.

2. Who is responsible for your personal data?

DHE is the party that is responsible for collecting and using your personal data (the "data controller"). DHE is a company with limited liability duly incorporated under the laws of the Netherlands, registered with the Chamber of Commerce no. 77560809, having its principal place of business at Strawinskylaan 831, 1077XX, Amsterdam, the Netherlands.

3. When does this Privacy Notice apply?

This Privacy Notice applies to the processing of personal data we collect from you in connection with your use of our website(s), when we supply products and/or services to you as a customer, when you deliver products and or services to us, when you apply for a vacant position within a DHE entity, visit one of our DHE locations or otherwise interact with us, as further detailed in this Privacy Notice under section 5 below.

This Privacy Notice does not apply to personal data that we collect and process in the context of your employment or other working relationship with us.

4. What types of personal data do we process?

Through the course of our business, DHE receives a wide range of personal data, including but not limited to your identification and contact details, such as names, addresses, zip codes, telephone numbers, facsimile numbers, and electronic mail addresses. We receive this information through a variety of means to ensure the smooth performance of the DHE business operations, such as applications and requests, surveys, business negotiations, executed contracts and agreements or when

you visit our website or location or contact us. We also receive personal data through publicly available media real estate registries, commercial registries and telephone directories.

The personal data that comes into our possession will be used for the purposes as further detailed in this Privacy Notice under section 5 below.

We do not ask for, collect or process any special categories of data about you for the purposes described in this Privacy Notice, unless you voluntarily provide such information. Special categories of personal data are often referred to as 'sensitive' personal data and include information relating to racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health or sexual life.

5. For what purposes do we process your personal data and on what legal basis?

We specify the purpose of use of the personal data we process below, and we use the personal data collected about you in compliance with the grounds specified under the GDPR and for the intended purpose only.

Please note that in some cases, you have no choice but to provide your personal data to us when you make use of our products or services. In other cases however, the provision of your personal data is voluntary. This can still mean that if you choose not to provide your personal data it might not be possible for us to provide you the products and/or services you request. We will inform you in the appropriate places, whether online or offline, if the provision of your personal data is mandatory in a particular scenario and what the consequences are if you do not provide your personal data.

The purposes and the legal basis for processing your personal data are the following:

5.1 To offer electronic mail delivery services and to deliver publications to inform you about the products and services offered by us, our business partners and affiliates

We process your personal data to send you electronic mails or other publications. The data we collect and process for this purpose includes your name, contact details, job title, information about your organization/company. We process this information for the purpose of providing information about the products and services offered by us, our business partners and affiliates. We will retain your personal data for this purpose for as long as we have a business relationship with you or you have an active subscription to receive our mail services, unless we are legally required and/or permitted to retain your personal data for a period thereafter.

We process your personal data for this purpose on the basis of article 6.1 (a) GDPR (your consent).

You may withdraw your consent and unsubscribe to our newsletter at any time. E-mail preferences can be managed through the subscription link in any e-mails you receive from us. For more information about your statutory rights, please be referred to section 6 of this Privacy Notice.

5.2 To manage our business relationship with you

We process your personal data when you interact with us as a current or prospective supplier or customer or other business contact, via email, telephone, our website and offline. The personal data we process for this purpose includes your name, contact details, information about your organization/company and your function, and other information that is exchanged in the context of our business relationship. We process this information for the purpose of managing our business relationships (including to execute and perform contracts and agreements, to contact and notify customers, to provide information about the products and services offered by DHE or its business partners and affiliates and to use for any other matters incidental and related to the businesses of DHE). We will retain your personal data for this purpose for as long as we have a business relationship, unless we are legally required and/or permitted to retain your personal data for a period thereafter.

We process your personal data for this purpose on the basis of article 6.1 (b) GDPR (performance of a contract, including pre-contractual measures).

5.3 To optimize and improve our products and services

We process your personal data to monitor and analyze your interactions with us. The personal data we process for this purpose includes your name, contact details, information about your organization/company, customer feedback and thoughts, and information about your interactions with DHE. We process this information for the purpose of better understanding our customers' needs and preferences, to improve and develop our products and services and to present information and proposals, and to conduct market research. To the extent possible, we will process aggregated data (i.e. data that cannot identify you or be linked to you, such as statistical data), pseudonymized or anonymized data, rather than personal data that allows us to directly identify you. We will retain your personal data for this purpose for as long as necessary for this purpose and as permitted by applicable law.

We process your personal data for this purpose on the basis of article 6.1 (f) GDPR (our legitimate interest of optimizing and improving our products and services) and, where required, on the basis of article 6.1 (a) GDPR (your consent).

5.4. To optimize and improve our website(s)

This website uses cookies to improve your experience while you navigate through the website. Out of these, the cookies that are categorized as necessary are stored on your browser without your consent as they are essential for the working of basic functionalities of the website. We also use third-party cookies that help us analyze and understand how you use this website. These cookies will be stored in your browser only with your consent. You also have the option to decline these cookies. But declining some of these cookies may affect your browsing experience. All the specific cookies that are used and are stored within five years.

5.5. To contact you when you reach out to us and to respond to your queries

We process your personal data when you contact us via email, telephone or regular mail. The personal data we process for this purpose depends on how and why you contact us, but will always include your name, contact details and information relating to your question or request. We process this information for the purpose of contacting you and responding to your question or request for reference materials or information. We will retain your personal data for this purpose for as long as this is necessary to handle your inquiry, unless we are legally required and/or permitted to retain your personal data for a period thereafter.

We process your personal data for this purpose on the basis of article 6.1 (a) GDPR (your consent) or, as the case may be, on the basis of article 6.1 (b) GDPR (performance of a contract, including pre-contractual measures).

5.6. To inform you about various events, seminars, campaign, membership service or other activities

We process your personal data to inform you about various events, seminars, campaigns, membership services and other activities. The personal data we process for this purpose includes your name, contact details and information about your organization/company. We process this information for the purpose of informing you, inviting you for our activity, for communicating with you about the activity, for registering your attendance, and for evaluation of the activity. We will retain your personal data for this purpose for as long as we have a business relationship, unless we are legally required and/or permitted to retain your personal data for a period thereafter.

We process your personal data for this purpose on the basis of article 6.1 (b) GDPR (performance of a contract, including pre-contractual measures) and, where required, on the basis of article 6.1 (a) GDPR (your consent).

5.7. To process your job application at DHE

We process your personal data when you apply for a job at DHE via email or regular mail. The personal data we process for this purpose includes your name, contact details, your education and work experience, your motivation for working at DHE, and other information that is included in your resume and cover letter. We will retain your personal data for this purpose for as long as 4 weeks after the end of the application procedure, unless we are legally required and/or permitted to retain your personal data for a period thereafter. With your consent, we will retain your personal data for future career opportunities with a maximum of 1 year.

We process your personal data for this purpose on the basis of article 6.1 (b) GDPR (performance of a contract, including pre-contractual measures) and, where required, on the basis of article 6.1 (a) GDPR (your consent).

5.8. To register your visit to our facility and to secure our premises

We process your personal data when you visit one of our DHE facilities as a guest. The data we process includes your name, contact details, and information about your organization/company, which we process for the purpose of visitor registration for security reasons. We will retain your personal data for this purpose for as long as 3 months, unless we are legally required and/or permitted to retain your personal data for a period thereafter.

We process your personal data for these purposes on the basis of article 6.1 (f) GDPR (our legitimate interests of protecting our premises).

5.9. To comply with our legal obligations

We process your personal data when this is necessary for us to comply with our legal obligations or is otherwise necessary in view of our legitimate interests, which may include the prevention and detection of fraud and other criminal activities, the resolution of disputes and disputed payment transactions, the retention and disclosure of information as required by applicable legislation and/or public authorities, for the purpose of audits, and for any other matters incidental and related to our businesses. We will retain your personal data only as long as necessary for these purposes, or as required or permitted by applicable law.

We process your personal data for these purposes on the basis of article 6.1 (c) GDPR (compliance with our legal obligation) and article 6.1 (f) GDPR (our legitimate interest of protecting our business), as applicable.

What are your rights in relation to your personal data?

The GDPR provides individuals with several "data subject rights" to empower them to have control over their personal data. We will respect your statutory rights and comply with your request insofar as we are legally required to. Please be aware that not all rights are absolute and that we may have legitimate grounds to refuse your request. When legally permitted, we may charge a prescribed fee to process a request you may make pursuant to this section.

You may exercise the following rights with respect to your personal data held by us:

- **Right to access.** You may request to access your personal data held by us.
- **Right to rectification.** You may request rectification of inaccurate and incomplete records of your personal data held by us.

- **Right to erasure.** You may request the erasure of your personal data held by us, in the event that this data is no longer needed for the purposes of processing. In some circumstances it may not be possible for us to accept a request to erasure. For example, when the processing of the personal data is required for us to comply with a legal obligation.
- **Right to restriction.** You may request to restrict or to stop the processing of your personal data held by us for a certain period, or for an indefinite period of time. In some circumstances it may not be possible for us to accept a request to erasure. For example, when the processing of the personal data is required for us to comply with a legal obligation.
- **Right to object.** You may object to the continuation of the processing of your personal data. The reasons to object must relate to a particular situation and be based on the grounds of legitimate interest.
- **Right to withdraw your consent.** Where processing is based on your consent, you have the right to withdraw consent at any time. Please note that withdrawing your consent is not affecting the lawfulness of processing based on consent before its withdrawal.
- **Right to data portability.** You have the right to request to receive your personal data in a structured, commonly used and machine-readable format, and to have the data transferred by us to another data controller unhindered, insofar as the processing is carried out on the basis of your consent or on the basis of a contract and the processing is carried out using an automated process.

You can exercise your data subject rights by contacting us using the details under '**How to contact us?**' section below. When you submit a request, we may ask you for additional information to confirm your identity.

We will review any request you make and will respond to your request within 30 days. The response time period may be extended for another 60 days if necessary, to help us respond properly. This could, for example, be the case for large and complex requests. In any case, we will inform you of the reasons for the extension. If we decide not to honor your request, we will inform you of the reasons as to why.

You have the right to lodge a complaint with the data protection authority if you have any complaints or concerns in relation to the processing of your personal data by us. In the Netherlands, the data protection authority is the *Autoriteit Persoonsgegevens*. Details of the data protection authorities in other EU Member States can be found [here](#).

6. With which parties do we share personal data?

In accordance with this Privacy Notice and as permitted by law, DHE shares your personal data with third parties in different ways and for different reasons, as further detailed below. DHE does not sell your personal data to third parties. Where legally required, we will ask for your consent before we share your personal data with third parties.

DHE is an international organization with affiliates across the world. Therefore, we share personal data within the DHE group of companies, of which the parent company is based in Japan. If DHE shares your personal data outside of the European Economic Area ("EEA") with other Daiwa House group companies or third parties, we will take additional measures to protect your personal data. Where legally required, we will ask for your consent before we transfer your personal data to territories outside the EEA. You may request additional information with respect to the transfer of personal data to non-EEA territory by contacting us using the contact details in the '**How to contact us**' section.

We also use third parties such as IT service providers, distributors, and marketing technology platforms and suppliers to perform services on our behalf. Where we engage third parties to perform services on our behalf, we enter into a contract to protect your personal data and will make every effort to manage personal data in a safe and appropriate manner by implementing security measures to prevent exposing personal data to risks, such as the unauthorized access of personal data from the outside or the loss, destruction, alteration, and leakage of information.

Where required and permitted by applicable law, we share personal data with public authorities, such as tax authorities, data protection authorities and/or other regulatory or governmental bodies.

We reserve the right to share your personal data with third parties in case we (consider to) sell or transfer all or part of our business activities or assets to a third party.

7. For how long will we retain your personal data?

DHE will retain your personal data only as long as necessary for the purposes in which the data is collected and processed, or as required or permitted by applicable law. Specific data retention periods for different processing purposes are set out above under section 5.

8. How to contact us?

If you have any questions concerning this notice or about how we handle your personal data or when you wish your statutory rights, please contact Daiwa House Europe B.V. 020-2382-980, info@daiwahouse.eu.

9. Updates to this Privacy Notice

We may update this Privacy Notice from time to time to reflect changes in the way we process personal data, for example if we implement new systems or processes that involve new uses of personal data or as may be required as a result of legal developments.

We will actively notify you about changes to this Privacy Notice or the way we use your personal data when we are legally required to do so.

This Privacy Notice was last updated on 04032022.