

Green Street (UK) ("GSA")

PRIVACY POLICY

Introduction

This policy sets out the different areas where user privacy is concerned and outlines the obligations & requirements of the users, the website and website owners in line with the EU General Data Protection Regulation ("GDPR"). Furthermore, the way this website processes, stores and protects user data and information will also be detailed within this privacy policy.

This privacy policy aims to give you information on how and why GSA processes your personal data, including when you use our website (regardless of where you visit it from) and any data you may provide through this website when you sign up to our newsletter or enquire about a product or service.

This website is not intended for children and we do not knowingly collect data relating to children.

Please read this privacy policy together with any other privacy policy or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements the other notices and is not intended to override them.

Fair processing notice

GSA will use the personal data collected from you for the purposes contained in the table below. Your personal data may be collected whenever you interact with us, including when you subscribe to the following services or publications:

- Green Street Blog
- Newsletter
- Invitation to Green Street events
- Webinars
- Green Street Insights
- CPPI
- Press Releases

Where we rely on your consent to process your personal data (explained in more detail below) you may withdraw that consent at any time by completing our Right to Withdraw Consent Procedure, which follows this privacy policy.

Who we are

Green Street Advisors (UK) Limited (*Trading as Green Street (UK)*) of 6th Floor, 30 Panton Street, London SW1Y 4AJ is the controller responsible for your personal data (referred to as "GSA" or "we" , "us" or "our" in this privacy policy).

We take our obligations very seriously and have appointed a data privacy manager (DPM) who is responsible for overseeing questions or concerns you may have about this privacy policy, including any requests to exercise your legal rights, please [contact us](#).

You have the right to make a complaint at any time to your local Supervisory Authority. In the UK this is the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). However, we would really appreciate the chance to deal with your concerns immediately so we would be grateful if you would [contact us](#) in the first instance.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

The website

This website and its owners take a proactive approach to user privacy and ensure the necessary steps are taken to protect the privacy of its users throughout their visiting experience.

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

While we take great care to protect your personal data on our website, unfortunately no information transmission over the Internet can be guaranteed to be 100% secure. Accordingly, we cannot ensure or warrant the security of any information you send to us or receive from us online. This is particularly true for information you send to us via email. We have no way of protecting that information until it reaches us.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Use of cookies

What are cookies?

Like many websites, our website may use 'cookies' from time to time.

Cookies are small files saved to the user's computer's hard drive that track, save and store information about the user's interactions and usage of the website. This allows the website, through its server, to provide the users with a tailored experience within this website.

What do we use cookies for?

We may use cookies to remember personal settings you have chosen at our website. In no other context do we use cookies to collect information that identifies you personally. Most of the cookies we set are automatically deleted from your computer when you leave our website or shortly afterwards.

We use anonymous session cookies (short-term cookies that disappear when you close your browser) to help you navigate the website and make the most of the features. If you log into the website, as a registered user, your session cookie will also contain your user ID so that we can check which services you are allowed to access.

This website uses tracking software to monitor its visitors to better understand how they use it. This software is provided by Hubspot which uses cookies to track visitor usage. The software will save a cookie to your computer's hard drive in order to track and monitor your engagement and usage of the website.

The default settings of browsers like Internet Explorer generally allow cookies, but users can easily erase cookies from their hard-drive, block all cookies, or receive a warning before a cookie is stored. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

Therefore, should users wish to deny the use and saving of cookies from this website onto their computer's hard drive, they should take necessary steps within their web browser's security settings to block all cookies from this website and its external serving vendors.

Personal data

Personal data is data that relates to an identified or identifiable natural person, this means a human being. Anonymous data, where you cannot find out who the data relates to, is not personal data.

Green may collect personal data from you, which can be split into the following different types:

- (a) Identity Data, which includes your first name, last name, date of birth and gender.
- (b) Contact Data, which includes your address, email address and telephone numbers.

- (c) Financial Data, which includes your bank account and payment card details.
- (d) Technical Data, which includes your IP address, your login data, and your browser type.
- (e) Profile Data, which includes your username and password and survey responses.
- (f) Transaction Data, which includes details about payments to and from you and other details of products and services you have purchased from us.
- (g) Marketing and Communications Data, which includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- (h) Usage Data, which includes information about how you use our website, products and services.

We may collect aggregated details about your use of the websites for the purposes of aggregate statistics or reporting purposes. Aggregated data (usage details combined from a number of people's data) may come from your personal data but if it does not directly or indirectly reveal your identity, it is not considered personal data and falls outside the scope of this Policy. For example, we may combine and analyse your use of the website to work out the number of users accessing a specific website feature. However, to the extent that the aggregated information could still be considered personal data, we will continue to process it in accordance with this privacy policy.

We do not collect any special categories of personal data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

Personal data collection and use

How do we collect personal data?

When you sign up for our services or communicate with us, you may choose to voluntarily give us certain personal data.

We use different methods to collect data from and about you, including when you fill out a form or give us personal data via the phone, by post, online or by email or otherwise. Other instances where we may collect personal data are, when you:

- (a) Visit our website or social media (e.g. through cookies);
- (b) Create an account with us to use our online portal;
- (c) Login to your account and utilise the various features;
- (d) Sign up for our mailing list/newsletter;
- (e) Enquire about or order products or services through our website or via the phone, fax, email, post or in person;
- (f) Create an account on our website;
- (g) Provide feedback;
- (h) Fill in a form on our website; and/or
- (i) Otherwise contact us.

Personal data may be collected by us and by our third party service providers who assist us in operating the website, including:

(a) Google Analytics:

(i) We use Google Analytics to help analyse how visitors access our website. Google Analytics generates statistical and other information about website use by means of cookies. Google will store this information.

(ii) If you do not want your website visit information reported by Google Analytics, you can install the Google Analytics opt-out browser add-on. For more details on installing and uninstalling the add-on, please visit the Google Analytics opt-out page at <https://tools.google.com/dlpage/gaoptout>.

(b) Hubspot

(i) We use Hubspot to help track and analyse inbound marketing opportunities. In common with many websites, when you read, browse or download information from our public website, Hubspot's system may collect information such as the date and time of your visit, the pages accessed, and any information downloaded. This information is used for sales analysis, client prospecting, and marketing campaigns.

For how long do we keep your personal data?

GSA will not retain your personal data for longer than necessary. We will hold onto the personal data you provide either while your account is in existence, or as needed to be able to provide our services to you, or for as long as is necessary to provide support-related reporting and analysis only.

If legally required or if it is reasonably necessary to meet regulatory requirements, resolve disputes, prevent fraud and abuse, or enforce our Terms and Conditions, we may also retain some of your personal data for a limited period of time as required, even after you have closed your account or it is no longer needed to provide the Services to you.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Please [contact us](#) for more information about the data retention periods which we might apply to specific personal data we hold about you.

If you do not provide personal data

Where we need to collect personal data by law, or under the terms of the contract between us and you do not provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

GSA will never sell any of your personal data.

Choosing how we use your personal data

We understand that you trust us with your personal data and we are committed to ensuring you can manage the privacy and security of your personal data yourself. Therefore, we will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- (a) Where we need to perform the contract we are about to enter into or have entered into with you.
- (b) Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- (c) Where we need to comply with a legal or regulatory obligation.

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data using more than one lawful ground depending on the specific purpose for which we are using your data. Please [contact us](#) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process your transactions including: (a) Manage payments, fees and charges	(a) Identity (b) Contact (c) Financial	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)

(b) Collect and recover money owed to us	(d) Transaction (e) Marketing and Communications	
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy	(a) Identity (b) Contact (c) Profile	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be	(a) Identity (b) Contact	Necessary for our legitimate interests (to develop our products/services and grow our business)

of interest to you	(c) Technical (d) Usage (e) Profile (f) Marketing and Communications	
To allow you to use our online platform and to manage your account	a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)

Change of purpose: We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Disclosures of your personal data

We do not disclose your personal data without your permission, unless the disclosure is:

- (a) In accordance with this privacy policy or any agreement you enter into with us;
- (b) To our related companies (i.e. the GSA Group);
- (c) To third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets; or
- (d) Required or authorised by law or for security reasons (including to prevent fraud).
- (e) To third parties, including our third-party service providers, to whom we may disclose, or provide access to, your personal data in connection with the purposes described in the table above.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

International Transfers

We share your personal data within the GSA Group. This will involve transferring your data outside the European Economic Area (**EEA**).

Some of our external third parties are also based outside the EEA so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we will ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- (a) We may transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission; or
- (b) Where we use certain service providers or transfer your personal data to members of the GSA Group located outside the EEA, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe ("Model Form Agreements"). For a copy of the text of these Model Form Agreements, see [here](#); or
- (c) Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

Please [contact us](#) if you want further information about the specific mechanisms we use when transferring your personal data outside of the EEA.

Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected, though we may need to verify the accuracy of the new information you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your personal data unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your personal data which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the personal data's accuracy; (b) where our use of the personal data is unlawful but you do not want us to erase it; (c) where you need us to hold the personal data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your personal data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated personal data which you initially provided consent for us to use or where we used the personal data to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent, or where we are relying on a different legal basis for the processing. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please [contact us](#).

We commit to giving you the ability to do all of the following:

- You can verify the details you have submitted to us by [contacting our Legal and Compliance Team](#). Our security procedures mean that we may request proof of identity before we reveal personal data. This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response
- You can also [contact us](#) to change, correct, or delete your personal data held by us at any time.
- You can always feel free to update us on your details at any point by sending an email to the above email address.
- You can request a readable copy of the personal data we hold on you at any time. To do this, please [contact us](#).

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Marketing

Marketing communications from us: We may use your personal data to try to understand what you may want or need, or what may be of interest to you. You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and you have not opted out of receiving that marketing, or where we are otherwise permitted to do so under applicable law.

Third-party marketing: We will get your express opt-in consent before we share your personal data with any other company for marketing purposes, unless we are otherwise permitted to share this personal data under applicable law.

Opting out: You can unsubscribe from receiving marketing emails from us by clicking the “unsubscribe” link at the bottom of any of our emails. Once you do this, you will no longer receive any emails from us. Where you opt out of receiving these marketing messages, this will not delete any personal data provided to us as a result of a purchase or other transaction.

Changes to this privacy policy

Please note, we are constantly reviewing how we process and protect data. Therefore, changes to our policy may occur at any time. We will endeavour to publicise any changes as soon as possible.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

Contact us

Should you have any queries or concerns in relation to the subject matter of this privacy policy, these may be addressed to Compliance@greenstreetadvisors.eu.com or by contacting our main number on +44 (0)203 793 7000 and asking for the compliance department. Alternatively, you may directly contact our Data Protection Officer, Natascha Collinson (ncollinson@greenstreetadvisors.eu.com).