



VASTNED

Limited liability company

Public Regulated Real Estate Company under Belgian law

Generaal Lemanstraat 61, 2018 Antwerpen

Company number 0431.391.860 (RLE Antwerp, division Antwerp)

VAT: BE 0431.391.860

Data Protection Policy

Approved by the Board of Directors on

19 february 2025

1. Introduction

Vastned ("**Vastned**" or the "**Company**") is a public regulated real estate company under Belgian law (Public RREC) (*openbare gereguleerde vastgoedvennootschap – Openbare GVV*) that has adopted the legal form of a limited liability company (*naamloze vennootschap*). The registered office of the Company is located at 2018 Berchem (Antwerp), Generaal Lemanstraat 61. The Company is a "listed company" within the meaning of Article 1:11 of the Belgian Companies and Associations Code ("**BCAC**") (*Wetboek van vennootschappen en verenigingen – WVV*), whose shares are listed on the regulated market of Euronext Brussels (VASTB) (and Euronext Amsterdam as a secondary listing).

Vastned was founded on 15 June 1987 and was granted the status of a real estate investment trust (*vastgoedbevak*) on 22 December 1998. Since 27 October 2014, the Company has the status of a public regulated real estate company under Belgian law, in accordance with the Act of 12 May 2014 on Regulated Real Estate Companies, as amended from time to time (the "**RREC Act**") (*Wet betreffende de Gereguleerde Vastgoedvennootschappen van 12 mei 2014*) and the Royal Decree of 13 July 2014 on Regulated Real Estate Companies, as amended from time to time (the "**RREC RD**") (*het Koninklijk Besluit van 13 juli 2014 met betrekking tot de Gereguleerde Vastgoedvennootschappen*), (hereinafter collectively referred to as the "**RREC legislation**").

On January 1st 2025 Vastned Retail N.V., listed company under Dutch law, merged with and into Vastned. The Vastned Group focuses on the best properties in the popular shopping areas of selected European cities with a historic city centre where shopping, living, working and leisure meet. The real estate clusters of the Vastned group have a strong tenant mix of international and national retailers, food & beverage entrepreneurs, residential tenants and office tenants.

The protection of your personal data is of the utmost importance to Vastned. In this data protection policy (hereinafter referred to as the "**Data Protection Policy**"), we describe how we process data relating to you or that can be used to identify you directly or indirectly (hereinafter referred to as "**Personal Data**"), as well as the measures we take to protect your Personal Data.

In relation to the aforementioned activities, Vastned acts as the data controller with the regards to the collection and processing of your Personal Data. Vastned will therefore take the necessary technical and organizational measures to protect your Personal Data.

Below we inform you, amongst other things, about the Personal Data that Vastned may process about you as a customer, user, subcontractor, customer's representative, supplier or shareholder, the purposes for which we use it, how long we keep it, with whom we share it and what your rights are in respect of your Personal Data and how you can exercise these rights. Vastned will process your Personal Data in accordance with applicable Belgian and European privacy legislation including, but not limited to, 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 (also known as the "**GDPR**") and the Belgian Act of 30 July 2018 on the protection of natural persons with regard to the processing of personal data (*Wet van 30 juli 2018 betreffende de bescherming van natuurlijke personen met betrekking tot de verwerking van persoonsgegevens*).

2. How can you reach us?

If you have any questions, comments or complaints about this Data Protection Policy, our processing of your Personal Data or wish to withdraw your consent to any particular processing, please contact us by phone at +32 3 361 05 90 or contact us by email at compliance@vastned.be.

3. For what purposes and on what legal grounds do we process your Personal Data?

3.1. General - The purposes for which we process Personal Data

We process your Personal Data inter alia when:

- you complete a customer (tenant) registration form online;
- you generally request our goods and/or services (so that we can communicate with you and deliver our services efficiently);
- you enter into an agreement with us;
- we maintain and update the share register of Vastned;
- you register on our website using the online form to receive press releases, marketing campaigns and advertisements. Press releases also include notices and information on vacancies and seminars that we may send you;
- you use our website;
- you contact our customer service and in case of any other questions, comments or complaints;
- you call on our tenancy service and/or get in touch with sales representatives;
- you apply for one of our vacancies;
- you request general advice or contact us through our website, by phone or by e-mail.

In general, we receive and process Personal Data from companies, suppliers, partners, subcontractors, etc. and their staff in the context of cooperation or future cooperation (prospecting). Below, we set out the (categories of) Personal Data we may collect and the legal basis (/bases) on which we do so. If we intend to further process your Personal Data for purposes other than those for which the Personal Data in question was initially collected on the basis of this Data Protection Policy, we will provide you with adequate notice before such further processing takes place, including the legal basis on which we rely for such further processing.

3.2. What Personal Data do we collect?

We may collect the following (categories of) Personal Data for the above processing purposes:

- Identification and contact details: address (street, number, postal code, town/city), surname, first name, date of birth, e-mail address, telephone number and/or mobile phone number;
- Professional details: company name, VAT number, professional address and phone number;
- Location: your postal address(es) and/or any other place where the services are performed or the website is used;
- Payment details: bank account number, billing information;
- Data related to job applications: name of current employer, position (title), content of CV;
- Cookies and similar technologies;

- Log files when using our services or website: date/time of visiting the website, status of website access, IP address and username of authenticated users;
- Metadata;
- Use of anonymised data for statistical purposes;
- Other Personal Data that you actively provide to us, for example by creating a profile on our website, correspondence or telephone.

3.3. On what legal grounds do we rely?

We may rely on the following legal grounds for processing your Personal Data:

- The processing of your Personal Data may be necessary for the performance of an agreement to which you are a party or to take action at your request or to provide requested goods and/or services. This includes (i) enabling you to use our website, (ii) providing you with information and advice, (iii) managing our business and day-to-day operations under an existing agreement, (iv) entering into a new agreement with us, (v) performing ongoing agreements (including, but not limited to, providing the requested goods and/or services), and (vi) any other interactions you have with us, e.g. administrative or technical purposes, to ensure the functionality of our services and information technology systems, etc.
- In addition, the processing of your Personal Data may be necessary for the purpose of our legitimate interests. This includes (i) following up our professional contacts with you and e.g. sending you our offers or reminders, (ii) to generally deliver our services to your company and employees, optimise our online presence and to be able to display our services on our website, (iii) ensuring the data security of our website, in particular for error analysis and the prevention of hacking attempts, (iv) providing you, as an existing customer, with information regarding our similar promotions and goods/services if your Personal Data were obtained directly from the sale of our services (you have the right to object, free of charge, to any advertising you receive by contacting us by telephone at +32 3 361 05 90 or by e-mail at compliance@vastned.be).
- We may also rely on the consent you have given to a particular data processing. Please note that you have the right to withdraw your consent to a particular data processing at any time. For example, you can use the link at the bottom of a press release to unsubscribe from Vastned's press releases. However, your contact details may then be retained within Vastned's CRM application if necessary, so that we can continue to provide you with other services. Please also note that withdrawing your consent may, in some cases, result in our services being discontinued.
- Finally, the processing of your Personal Data may also be necessary to comply with a legal obligation. This may include (i) tax obligations, (ii) anti-money laundering obligations, (iii) providing information to a government or law enforcement agency, or (iv) complying with a court order.

4. How do we secure your Personal Data and comply with processing principles?

We provide the necessary technical and organisational measures to ensure the security of your Personal Data. These measures are designed to protect your Personal Data from unauthorised access, loss, compromise of integrity or disclosure. In implementing these measures, we have carefully considered the potential impact on your privacy, our IT infrastructure, associated costs and current industry standards for data security.

For example, we only store your Personal Data on secure servers and always within the European Economic Area (hereinafter "EEA"). Should your Personal Data be transferred to a partner of Vastned outside the EEA, Vastned shall ensure that this transfer is in accordance with applicable privacy legislation. Any such transfer will be covered by an agreement that meets the required appropriate safeguards for the transfer of Personal Data outside the EEA, such as, for example, the standard contractual clauses approved by the European Commission. Furthermore, we will ensure that only the necessary persons have access to your Personal Data.

Organisationally, we have an established information security policy, corresponding action plan and clear responsibilities and competences. The necessary processes and procedures are in place to ensure the best possible implementation and monitoring of this policy. If your Personal Data is processed by a third party, this will only be possible if this third party agrees to comply with the technical and organisational data security measures imposed by Vastned.

Vastned also always complies with the principle of data minimisation. The Personal Data we collect are adequate and relevant to our processing purposes. We limit the collection of your Personal Data to the minimum necessary for the purposes for which we process the Personal Data. Furthermore, Vastned does not make decisions based solely on the automated processing of your Personal Data and/or based on profiling.

5. How long will your Personal Data be kept?

Vastned will not keep your Personal Data for longer than is strictly necessary to fulfil the purposes for which they were collected. How long we keep your Personal Data depends on the purpose for which we use them, as set out in this Data Protection Policy.

After termination of our contractual relationship with you, the Personal Data will be deleted or anonymised after ten (10) years at the latest, unless we are legally obliged to keep your Personal Data longer. As a data subject, you can expressly request earlier deletion of your data without violating the statutory retention periods.

6. With who do we share your Personal Data with?

At no time do we sell or rent any of your Personal Data to individuals or companies that are not part of Vastned.

Vastned only transfers your Personal Data to trusted partners, which are companies we instruct to process data within the legally defined parameters (service providers, contractors, etc.). In this case, Vastned remains responsible for the protection of your Personal Data. Vastned has implemented various legal, technical and organisational measures in this respect, and carries out regular checks, to ensure that the data processors we engage comply with the applicable national and European privacy legislation.

Specifically, we contract with the following trusted partners in the following areas:

- Cooperation partners of Vastned who provide services to you under their own responsibility. This is the case when you request us to provide services from these partners, or if you consent to the partner's involvement or we involve them in a situation where we are legally permitted to do so;
- Law enforcement or government agencies where these have taken legal action to ask Vastned to disclose the information. In this case, Vastned may be obliged to disclose the Personal Data by law and/or regulation or as a result of legal action;

- External suppliers of services to Vastned, such as data processing providers (IT), marketing, sales, consulting, finance, HR, logistics, customer service, printing. Data collected when you subscribe to our press releases is not shared with third parties;
- Certain regulated (liberal) professions, such as lawyers, notaries or accountants.

Personal Data is transferred within the Vastned group only for internal administrative purposes in connection with centralised customer service and order processing. Vastned has established a number of internal policies in this regard that require its affiliated companies or subsidiaries to implement technical and organisational measures to guarantee the security of data processing.

Finally, we may sometimes share certain Personal Data with third parties if we consider it necessary to protect our acquired rights.

7. Use of cookies

Vastned's website uses "cookies". Cookies are small text files that are stored on your computer and contain specific data so that you will be recognised again on your next visit. By using cookies, we can offer you faster and more efficient access to our website. The cookie is only stored if you explicitly agree to it. Furthermore, cookies are used in press releases to recognise the person logged in, so there is no need to log in again. You can disable the use of cookies at any time through your browser settings. If you disable the use of cookies, our website is still accessible, though you may not have access to all functionalities.

8. What are your rights and how can you exercise them?

You have the following rights in relation to our processing of your Personal Data:

- **Right of access and rectification:** you have the right to access the Personal Data we collect about you. If you believe that the Personal Data we hold about you is inaccurate or not up to date, you have the right to ask us to correct any inaccuracies.
- **Right to object:** if applicable, you have the right to object to our processing of your Personal Data. This can be done if we no longer have the right to process it or against processing by us of your Personal Data for certain purposes. Furthermore, you can demand that we delete your Personal Data if we keep it for too long, or demand that, in certain circumstances, processing be subject to restrictions. In particular, you may object, free of charge and without justification, to processing for direct marketing purposes (e.g. e-mails).
- **Right to deletion:** you can always ask us to delete your Personal Data. However, where we are legally obliged to keep this data, we cannot comply with this request.
- **Right to data portability:** you may submit a request to Vastned to send your Personal Data held by Vastned in a computer file to you or another organisation designated by you.
- **Right to withdraw your consent:** if your Personal Data is processed on the basis of your consent, as mentioned above, you have the possibility to withdraw this consent at any time, without justification.

You can exercise these rights by submitting a clear request to our administration using the contact details listed under article 2. In your request, you should state which right you wish to exercise with the necessary explanation and how we can contact you. We will always try to answer your request as soon as possible.

These rights can only be exercised in a reasonable manner and in accordance with applicable law. In principle, you may exercise these rights free of charge, except in cases of excessive requests, manifestly unfounded requests or frequently repeated requests, where we may charge a reasonable administrative fee.

9. Complaints handling

If you have a complaint about the processing of your personal data, you can contact Vastned's Compliance Officer on the following number + 32 3 361 05 90 or by e-mail compliance@vastned.be. The Compliance Officer will investigate the complaint and take appropriate action. If a breach of this data protection policy is identified, the Compliance Officer will report this to the competent authority.

Vastned informs you that if you are not satisfied with our response/resolution to a question and/or complaint, you have the possibility of filing a complaint with the Belgian Data Protection Authority (de *Gegevensbeschermingsautoriteit*), acting as supervisory authority. This can be done via the following contact details:

Belgian Data Protection Authority
Drukpersstraat 35, 1000 Brussels
Tel +32 (0)2 274 48 00 - Fax +32 (0)2 274 48 35
contact@apd-gba.be
www.gegevensbeschermingsautoriteit.be/contact

10. Final provisions

Questions and suggestions on the topic of data protection are always welcome. This is a very important topic for Vastned and we appreciate your input.

This Data Protection Policy forms an integral part of Vastned's terms of use and general conditions of sale. Furthermore, this Data Protection Policy also applies to offers and advertisements of Vastned that we or a third party on behalf of Vastned may display on third-party websites, platforms and applications based on your user information collected on our website. These third-party websites, platforms and applications also have their own data protection policies and general terms and conditions. Vastned recommends that you consult these prior to visiting these third-party websites, platforms and applications.

Finally, Vastned may amend this Data Protection Policy by posting the updated version on its website. When changes are made, Vastned will update the date of the "last update" at the top of this Data Protection Policy. However, Vastned will never amend your rights under this Data Protection Policy to your detriment without your prior consent.