

DATA PROTECTION NOTICE

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Introductory section: Key changes

As a trusted companion, the protection of your personal data is important to the BNP Paribas Group.

We have revised our Data Protection Notice to improve transparency and provide further information on our processing of your personal data, including but not limited to personal data processing in the context of:

- the treatment related to commercial prospecting and the legal basis; and
- anti-money laundering, countering the financing of terrorism and international sanctions (freezing of assets).

Introduction

We take the protection of your personal data very seriously. Accordingly, the BNP Paribas Group has adopted strong data protection principles in its Personal Data Protection Charter available at https://group.bnpparibas/uploads/file/bnpparibas_personal_data_privacy_charter.pdf.

The entities of the BNP Paribas Real Estate Germany Group¹ ("we"), as a controller, are each responsible for the collection and processing of your personal data in connection with their activities.

As a member of an integrated banking and insurance group, in collaboration with the various entities of the Group, we provide our clients with a complete range of real estate, banking, investment, savings, insurance and leasing products and services.

In the real estate sector, we advise and support our customers – investors, tenants/owners, project developers, public authorities and private individuals – on all real estate-related issues and projects.

The purpose of this Data Protection Notice is to explain to you how we process your personal data, how you can control and manage it.

¹ BNP Paribas Real Estate Holding GmbH, BNP Paribas Real Estate GmbH, BNP Paribas Real Estate Property Management GmbH, BNP Paribas Real Estate Consult GmbH, BNP Paribas Real Estate Property Development & Services GmbH.



Further information may be provided where necessary at the time of collection of your personal data. This also applies if the data is not collected directly by us but by our partners.

1. ARE YOU AFFECTED BY THIS STATEMENT?

This Data Protection Notice applies to you ("you") if you are:

- a visitor of our websites;
- in a customer relationship with us, as the recipient of our consulting services, a party to a legal transaction brokered by us, the owner, buyer or seller of a property, or a potential tenant of a property
- our business partner (e.g. supplier or service provider, media representative) or are in any other contractual or legal relationship with us (e.g. as a guarantor);
- interested in our products or services and provide us with your personal data yourself (e.g. on our websites and digital applications, at events or sponsorship campaigns or via an agency) so that we can contact you;
- a tenant or landlord of a property marketed, managed, valued or analysed by us.

When you provide us with third party personal data, please ensure you inform such third parties about the disclosure of their personal data and invite them to read this Data Protection Notice. We will use our reasonable endeavors to do the same when possible (e.g., when we have the person's contact details).

2. HOW CAN YOU CONTROL OUR PROCESSING OF YOUR PERSONAL DATA?

You have the rights described below, which allow you to exercise control over your personal data and the way in which we process it.

If you wish to exercise the rights listed below, please address your request to all controllers of the BNP Paribas Real Estate Germany Group at the following address: BNP Paribas Real Estate, Fritz-Vomfelde-Straße 26, 40547 Düsseldorf, Germany, or by email to datenschutz@realestate.bnpparibas. We may ask you to provide suitable proof of identity for identification purposes.

If you have any questions about this privacy policy, in particular how we use your personal data, please contact our data protection officer using the contact details above.

2.1. You can request access to your personal data

If you wish to have access to your personal data, we will provide you with a copy of the personal data to which your request relates and to which you are entitled to as well as the information relating to how such information is processed.

Your right to access to your personal data may be restricted by legal provisions. This is the case, for example, with the German Act on the Tracing of Profits from Serious Criminal Activities (GwG), which prohibits us from providing information on such processes.

2.2. You can request the correction of your personal data

If you find that data relating to you is incorrect or incomplete, you can request that this data be corrected or completed accordingly. Under certain circumstances, you may be required to provide supporting documentation.

2.3. You can request the deletion of your personal data

You may request the deletion of your personal data to the extent permitted by law.



2.4 You can object to the processing of your personal data on the basis of legitimate interests

If you do not agree with a processing activity based on a legitimate interest, you can object to it, on grounds relating to your particular situation, by informing us precisely of the processing activity involved and the reasons for your objection. We will cease processing your personal data unless there are compelling legitimate grounds for doing so or it is necessary for the establishment, exercise or defence of legal claims.

2.5 You can object to the processing of your personal data for direct marketing purposes

You have the right to object at any time to the processing of your personal data for direct marketing purposes, including profiling, insofar as it is linked to such direct marketing

2.6. You can request the restriction of the processing of your personal data

If you query the accuracy of the personal data we use we will review and/or verify the accuracy of the personal data. If you object to the personal data we process we will review the basis of the processing. You may request that we suspend the use of your personal data while we review your query or objection.

2.7. You have rights against automated decisions

You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you. However, we may automate such a decision if it is necessary for the entering into or performance of a contract with us, authorised by law or regulation or if you have given your consent.

In any event, you have the right to challenge the decision, express your views and/or request the intervention of a competent person to review the decision.

2.8. You can withdraw your consent

If the processing of your personal data is based on your consent, you may withdraw your consent at any time with future effect.

2.9. You can request the portability of part of your personal data

You may request a copy of the personal data that you have provided to us in a structured, commonly used and machine-readable format. Where technically feasible, you may request that we transmit this copy to a third party.

2.10. Lodging a complaint with a Data Protection supervisory authority

In addition to exercising the above rights, you may lodge a complaint with any supervisory authority responsible for data protection. The address of the supervisory authority responsible for us is: **State Commissioner for Data Protection and Freedom of Information** of the State of North Rhine-Westphalia, Postfach 200444, 40102 Düsseldorf, Tel.: 0211/38424-0, Email: poststelle@ldi.nrw.de, <https://www.ldi.nrw.de>.

3. WHY AND ON WHICH LEGAL BASIS DO WE USE YOUR PERSONAL DATA?

3.1. Your personal data is processed to comply with our various legal and/or regulatory obligations

Your personal data is processed, where necessary, to enable us to comply with the laws and/or regulations to which we are subject, including real estate, banking and financial regulations.

3.1.1. We may use your personal data to

- detect and prevent fraud, and to handle cases of fraud;
- comply with our obligations under money laundering regulations;
- monitor and report risks (financial, credit, legal, compliance or reputational risks etc.) that the BNP Paribas Group could incur in the context of its activities;
- assist in the fight against tax fraud and comply with tax control and reporting obligations;
- Record transactions for accounting purposes and comply with our tax and accounting obligations;
- comply with the provisions applicable to trust service providers issuing electronic signature certificates;



- prevent, detect and report risks related to Corporate Social Responsibility and sustainable development;
- detect and prevent bribery;
- Respond to official requests from duly authorised local or foreign financial, tax, administrative, criminal or judicial authorities, law enforcement agencies, government agencies or public institutions;
- Process your request in accordance with applicable data protection law.

3.1.2. We process your personal data for the purposes of combating money laundering and countering of the financing of terrorism purposes

As part of a banking group, we must have a robust system of anti-money laundering and countering of terrorism financing (AML/TF) in each of our entities managed centrally, as well as a system for applying local, European and international sanctions.

In this context, we are joint controllers with BNP Paribas SA, the parent company of the BNP Paribas Group

The processing activities performed to meet these legal obligations are detailed in Appendix 1 "Processing of personal data to combat money laundering and terrorist financing".

3.2. Your personal data is processed to perform a contract to which you are a party or pre-contractual measures taken at your request.

Your personal data will be processed if it is necessary for the entering into or performance of a contract in order to:

- carry out a credit check on your payment and performance history;
- assess whether and on what terms we can offer you a product or service;
- offer you our services and perform them on your behalf or within the scope of the respective contract;
- advise you on your property and investments;
- value your property by preparing expert reports;
- organise data provided by you for structuring in data rooms, e.g. in preparation for upcoming property sales, for due diligence purposes or for portfolio management;
- aggregate and visualise transaction data for the preparation of market reports and other reports;
- manage rental agreements on your behalf and ensuring compliance with the contractual obligations arising from the rental agreement;
- manage homeowners' associations on your behalf;
- support our customers when they act as policyholders of construction or building insurance and submit a claim;
- manage existing arrears (identification of customers with arrears);
- respond to your enquiries and provide you with support;
- manage claims and disputes relating to agents, rental agreements and contracts on your behalf;
- use a service you offer.

3.3. Your personal data is processed to fulfil our legitimate interest or that of a third party

Where we base a processing activity on legitimate interest, we balance that interest against your interests or fundamental rights and freedoms to ensure that there is a fair balance between them. If you would like more information about the legitimate interest pursued by a processing activity, please contact us using the contact details provided in section 2 "HOW CAN YOU CONTROL OUR PROCESSING OF YOUR PERSONAL DATA" above:

3.3.1. In the course of our business activity as a real estate service provider, we use your personal data to:

- manage the risks to which we are exposed:
 - we keep evidence of operations or transactions, including in electronic evidence;



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- we monitor your transactions to manage, prevent and detect fraud;
- we carry out the collection of debts;
- we manage legal claims and defend our position in the event of litigation;
- we develop individual statistical models in order to help define your creditworthiness.;
- enhance cyber security, manage our platforms and websites, and ensure business continuity;
- ensure the security of buildings, property and information, and to prevent and, where necessary, investigate unauthorised physical access (e.g. by maintaining building access logs and using video surveillance);
- enhance the automation and efficiency of our operational processes and client services (e.g., automatic filling of complaints, tracking of your requests and improvement of your satisfaction based on personal data collected during our interactions with you such as phone recordings, e-mails or chats);
- perform statistical analyses and model calculations;
 - for commercial purposes: to identify the real estate products and services that best meet your needs, to further develop and adapt our services in line with your needs and taking into account current market trends;
 - for security purposes: to prevent potential incidents and improve security management;
 - for the purposes of compliance with relevant regulations (e.g. to combat money laundering and terrorist financing) and risk management;
 - for the purposes of combating corruption and fraud;
- improve our business development and carry out customer follow-up activities;
- organise contests, lotteries, promotional operations, conduct opinion and client satisfaction surveys.

3.3.2. We use your personal data to send you commercial offers by email and post.

As part of the BNP Paribas Group, we want to be able to offer you access to the full range of products and services that best meet your needs.

Once you are a recipient of our consulting services and unless you object, we may send you marketing materials relating to our products and services by electronic mail (e.g. email, SMS) if they are similar to those you have already subscribed to or used.

We will ensure that these offers relate to products or services that are relevant to your needs and that complement the products and services you have already received.

We may also send you offers for our products and services, as well as those of the Group and our trusted partners, by post. You can object to the processing of your data for the purpose of customer information by electronic mail, for the Bank's own similar products and services, and for the sending of commercial offers by post at any time with effect for the future.

3.3.3. We analyse your personal data to create a standard profile to better personalise our products and offers

To enhance your experience and satisfaction, we need to determine which client group you belong to. For this purpose, we build a standard profile from relevant data that we select from the following information:

- what you have directly communicated to us during our interactions with you or when you subscribe to a product or service;
- resulting from your use of our products or services;
- from your use of our various channels: websites and applications;

Unless you object, we will perform this customization based on standard profiling. If you consent, we may go further to better meet your specific needs by offering you products and services tailored to you.



3.4. Personal data processed if you have given your consent

For some processing of personal data, we will give you specific information and ask for your consent. Of course, you can withhold your consent or, if given, withdraw your consent at any time.

In particular, we ask for your consent for:

- any electronic offer for products and services not similar to those you have subscribed to or for products and services from our trusted partners;
- the use of your electronic usage data (e.g. via cookies, social media) for commercial purposes or to improve our knowledge of your profile.

4. WHAT TYPES OF PERSONAL DATA DO WE COLLECT?

We collect and use your personal data meaning any information that identifies or, together with other information, can be used to identify you.

Depending, among others, on the types of product or service we provide to you and the interactions we have with you, we collect various types of personal data about you, including:

- **Identification data:** e.g. full name, gender, place and date of birth, nationality, identity card or passport number, driving licence number, vehicle registration number, photo, signature;
- **Contact details:** (private or professional) e.g. postal address, email address, telephone number;
- **Property details:** e.g. full address, type of property;
- **Living situation** and personal circumstances (financial and property ownership status);
- **Bank and financial data or tax information:** e.g. bank account details, tax identification number, tax status, country of residence, salary and other income, value of your assets;
- **education and employment information** (e.g. level of education, employment, employer's name);
- **Data relating to your habits and preferences in relation to the use of our products and services:**
- **Data from our interactions with you:** e.g. your comments, suggestions, needs that we **have collected** during our exchanges with you in person at our locations (contact reports) or during telephone communications (call notes or call recordings), communication by email, chat, exchanges on our social media sites or from any complaints you may have made, your connection and tracking data (e.g. collected via cookies for non-advertising or analytical purposes on our websites), online services, applications;
- **Data collected via video surveillance;**
- **Information about your device (mobile phone, computer, tablet, etc.):** IP address, technical specifications and unique identification data;
- **personalised login details or security features used to connect you to the BNP Paribas website and apps.**

We may collect sensitive data such as health data, biometric data, or data relating to criminal offences, subject to compliance with the strict conditions set out in data protection regulations.

5. FROM WHOM DO WE COLLECT PERSONAL DATA?

We collect personal data directly from you; however, we may also collect personal data from other sources.

Where applicable, we sometimes collect data from public sources:

- publications/databases made available by official authorities or third parties (e.g. land registry extracts, commercial registers);
- websites/social media pages of legal entities or business clients containing information that you have disclosed (e.g., your own website or social media page);
- public information such as that published in the press.

We also collect personal data from third parties:



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- from other BNP Paribas Group entities; from our clients (companies or individuals);
- from our business partners (companies or individuals);
- from service providers of payment initiation and account aggregators (service providers of account information);
- from third parties such as credit reference agencies (e.g. Creditreform) and fraud prevention agencies;
- from data brokers who are responsible for ensuring that they collect relevant information in a lawful manner.

6. WHO DO WE SHARE YOUR PERSONAL DATA WITH AND WHY?

a. With BNP Paribas Group's entities

As a member of the BNP Paribas Group, we work closely with the group's other companies worldwide. Your personal data may therefore be shared between Group entities, where necessary, to:

- Comply with our various legal and regulatory obligations described above;
- fulfil our legitimate interests which are:
 - to manage, prevent, detect fraud;
 - conduct statistical studies and develop predictive and descriptive models for business, security, compliance, risk management and anti-fraud purposes;
 - enhance the reliability of certain data about you held by other Group entities
 - offer you access to all of the Group's products and services that best meet your needs and wishes;
 - customise the content and prices of products and services.

b. With recipients outside the BNP Paribas Group and processors

In order to fulfil some of the purposes described in this Data Protection Notice, we may, where necessary, share your personal data with:

- processors which perform services on our behalf (e.g., IT services, logistics, printing services, telecommunications, debt collection, advisory and distribution and marketing).
- local or foreign financial, tax, administrative, criminal or judicial authorities, arbitrators or mediators, public authorities or institutions to which we, or any member of the Group, are required to disclose pursuant to:
 - their request;
 - our defence, action or proceeding;
 - complying with a regulation or a recommendation issued from a competent authority applying to us or any member of the the BNP Paribas Group;
- certain regulated professions such as lawyers, notaries, or auditors when needed under specific circumstances (litigation, audit, etc.) as well as to our insurers or to an actual or proposed purchaser of the companies or business units of the BNP Paribas Group or our insurers.

7. INTERNATIONAL TRANSFER OF PERSONAL DATA

In case of international transfers from the European Economic Area (EEA) to a third country outside the EEA, the transfer of your personal data may take place on the basis of a decision by the European Commission where it has recognised that the country to which your data will be transferred ensures an adequate level of protection.

In case of transfers of your personal data to a third country where the level of protection has not been recognized as adequate by the European Commission, we will either rely on a derogation applicable to the specific situation (e.g., if



the transfer is necessary to perform our contract with you, such as when making an international payment) or implement one of the following safeguards to ensure the protection of your personal data:

- Standard contractual clauses approved by the European Commission;
- Binding corporate rules.

To obtain a copy of these safeguards or details on where they are available, you can send a written request to the address set out in section 2 above.

8. HOW LONG DO WE KEEP YOUR PERSONAL DATA?

We store your personal data for the period necessary to comply with applicable laws and regulations or such other period necessary for us to meet our operational obligations, such as: proper account maintenance, facilitating client relationship management, and/or responding to legal claims or regulatory requests. For example, most customer information is retained for the duration of the contractual relationship and for 10 years after the end of the contractual relationship. For potential customers and prospects, information is retained for 24 months after your last contact.

9. HOW YOU CAN FOLLOW THE EVOLUTION OF THIS DATA PROTECTION DECLARATION

In a world where technologies are constantly evolving, we regularly review this Data Protection Notice and update it as required.

We invite you to review the latest version of this document online, and we will inform you of any significant amendments through our website or through our standard communication channels.



Processing of personal data to combat money laundering and the financing of terrorism

We are part of the BNP Paribas banking Group ("Group") that must have a robust anti-money laundering and anti-terrorist financing (AML/CFT) system at entity level, centrally piloted, an anti-corruption mechanism, as well as a mechanism to ensure compliance with International Sanctions (i.e., any economic or trade sanctions, including associated laws, regulations, restrictive measures, embargoes, and asset freezing measures that are enacted, administered, imposed, or enforced by the French Republic, the European Union, the *U.S. Department of the Treasury's Office of Foreign Assets Control*, and any competent authority in territories where we are established)

In this context, we act as joint controllers together with BNP Paribas SA, the parent company of the BNP Paribas Group (the terms "we" and "our" when used in this appendix therefore also cover BNP Paribas SA).

For the purposes of AML/CFT and compliance with International Sanctions, we implement the processing operations listed below to meet our legal obligations:

- A "Know Your Customer" (KYC) programme reasonably designed to identify, verify and update the identity of our clients, including where applicable, their respective beneficial owners and proxy holders;
- Enhanced due diligence for high-risk clients, Politically Exposed Persons or "PEPs" (PEPs are persons defined by the regulations who, due to their function or position (political, jurisdictional or administrative), are more exposed to these risks), and for situations of increased risk;
- Written policies, procedures and controls reasonably designed to ensure that we do not establish or maintain relationships with shell banks;
- A policy, based on the internal assessment of risks and of the economic situation, to generally not process or otherwise engage, regardless of the currency, in activity or business:
 - o for, on behalf of, or for the benefit of any individual, entity or organisation subject to Sanctions by the French Republic, the European Union, the United States, the United Nations, or, in certain cases, other local sanctions in territories where the Group operates;
 - o involving directly or indirectly sanctioned territories, including Crimea/Sevastopol, Cuba, Iran, North Korea, or Syria;
 - o involving financial institutions or territories which could be connected to or controlled by terrorist organisations, recognised as such by the relevant authorities in France, the European Union, the U.S. or the United Nations;
- Client database screening and transaction filtering reasonably designed to ensure compliance with applicable laws;
- Systems and processes designed to detect and report suspicious activity to the relevant regulatory authorities;
- A compliance programme reasonably designed to prevent and detect bribery, corruption and unlawful influence pursuant to the French *"Sapin II"* Law, the *U.S FCPA*, and the *UK Bribery Act*.

In this context, we make use of:

- services provided by external providers that maintain updated lists of PEPs such as Dow Jones Factiva (provided by Dow Jones & Company, Inc.) and the World-Check service (provided by REFINITIV, REFINITIV US LLC and London Bank of Exchanges);
- publicly available press information on matters relating to money laundering, terrorist financing or corruption;
- Knowledge of high-risk behaviour or high-risk situations (suspicious activity reports or equivalent available) that can be identified at the level of the BNP Paribas Group.

Due to the objective of combating money laundering and terrorist financing, we may need to process special categories of personal data or data relating to criminal convictions and offences.

We carry out these checks when you enter into a relationship with us, but also throughout the relationship we have with you, both on yourself and on the transactions you carry out. At the end of the relationship and if you have been the subject of an alert, this information will be stored in order to identify you and to adapt our controls if you enter into a new relationship with a BNP Paribas Group entity, or in the context of a transaction to which you are a party.



In order to comply with our legal obligations, we share the information collected for the purposes of combating money laundering and terrorist financing, anti-corruption or the application of international sanctions between the entities of the BNP Paribas Group. If your data is transferred to countries outside the European Economic Area where there is no adequate level of protection, the transfers are governed by the European Commission's standard contractual clauses. If additional data are collected and exchanged in order to comply with the regulations of non-EU, this processing is necessary for our legitimate interest, which is to enable the BNP Paribas Group and its entities to comply with their legal obligations and to avoid local penalties.



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