

DATA PROTECTION NOTICE

This document explains how NEPI ROCKCASTLE S.A. (the **Company**), as data controller, processes the personal data of shareholders and their proxies, as the case may be, in line with data privacy applicable legal framework.

What types of personal data we process?

- email address
- phone number
- full details of the shareholder's title to shares issued by the Company
- signature
- IP address
- geographical location

Which are the purposes of processing for your personal data?

- to identify you as the Company's shareholder, for the purpose of enabling your attendance and voting in person or by proxy at the Company's annual general meeting (the **AGM**).

What is the legal ground for processing?

We process your data based on our legitimate interest justified by our reasonable need to identify you as a Company's shareholder, for the purpose of enabling your attendance and voting in person or by proxy at the AGM.

Is your personal data transferred or disclosed?

Your personal data might be accessible within NEPI Rockcastle Group (details regarding the group are to be found here <https://nepirockcastle.com/portfolio/>), as a consequence of our integrated approach in overall processes management at Group level.

Which are your rights as data subject, under the data privacy legislation requirements?

- **Right to be informed** – right to be informed, at the time the personal data are collected, about the processed data and the related purposes of processing.
- **Right of access** - the right to obtain from the controller confirmation as to whether or not personal data concerning a data subject are being processed, and, where that is the case, access to the personal data and the following information: purposes of the processing; categories of personal data concerned; the recipients or categories of recipient to whom the personal data have been or will be disclosed; the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period; the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing; the right to lodge a complaint with a supervisory authority; where the personal data are not collected from the data subject, any available information as to their source; the existence of automated decision-making, including profiling.
- **Right to rectification** - the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning the data subject.
- **Right to erasure or right to be forgotten** - the right to obtain from the controller the erasure of personal data concerning the data subject, without undue delay and the controller shall have the obligation to erase personal data without undue delay where: data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; data subject withdraws consent and there is no other legal ground for the processing; data subject objects to the processing and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing for direct marketing purpose; the personal data have been unlawfully

processed; data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject.

- **Right to restriction of processing** - the right to obtain from the controller restriction of processing where: the accuracy of data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data; the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead; the controller no longer needs the data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims; the data subject has objected to processing, pending the verification whether the legitimate grounds of the controller override those of the data subject.
- **Right to data portability** - the right to receive the personal data concerning the data subject, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where: the processing is based on consent or on a contract and is carried out by automated means.
- **Right to object** - the right to object, on grounds relating to his or her particular situation, at any time, to processing of personal data concerning the data subject, where processing is necessary for (i) the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller, (ii) or for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child, including profiling based on those provisions.
- **Rights in relation to automated decision making and profiling** - The data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her.

How long we store your personal data?

According to the data minimisation principle, your personal information will not be stored for a longer period than necessary, having regard to the purpose of the processing. The data collected for the purposes described herein are to be stored for 60 (sixty) days, unless otherwise provided by applicable legal requirements.

NEPI Rockcastle Group is processing your personal data in compliance with data privacy legal framework, ensuring appropriate security measures, preserving confidentiality and integrity, including where we use Data Processors in processing your personal data.

Where you decided to assign a proxy to represent you at the AGM, it is your obligation to inform him/her about the processing details described herein.

Should you have any question regarding the way we process your personal data, wish to address a request regarding exercising your rights under data privacy legislation or intend to file a complaint, please contact us at data.protection@nepirockcastle.com.