

Mirastar Real Estate Investment Management Limited

Website Privacy Notice

Mirastar Real Estate Investment Management Limited, its subsidiaries and its affiliates which are identified as data controllers in the list below ("we"; "us"; "our") respect your privacy and are committed to protecting your personal information at all times.

Data Controllers

Mirastar Real Estate Investment Management Limited

We are data controllers in respect of the personal information which we hold about you. This means that we are responsible for deciding how we hold and use personal information about you.

In accordance with the General Data Protection Regulation ((EU) 2016/679) (the "GDPR"), this privacy notice sets out how we use your personal information and your legal rights in relation to your personal information.

This privacy notice applies to our use of any personal information which we may collect from you via this website or which we may otherwise collect from you through any other means, such as email, phone or face to face communications. In addition, this privacy notice also applies to any information which we may collect about you from third party sources in the course of operating our business.

It is important that you read this privacy notice so that you are fully aware of how and why we are using your data.

Information we hold about you

To enable us to operate our business and promote our services effectively, it is necessary for us to hold and process personal information about: investors and potential investors; individuals who use our website or engage in other forms of communication with us; individuals who subscribe to receive information about our products and services; and individual tenants at our properties. Accordingly, we may collect, use, store and transfer different kinds of personal information about you which we have grouped together as follows (please note that this is not an exhaustive list):

- **Identity Data** includes name, title, date of birth, gender, personal description, job title and employment details.
- **Contact Data** includes address, email address and phone numbers.
- **Financial Data** includes bank account details and financial details.
- **Transaction Data** includes details about payments to and from you and other details of investments you have made with us, services you have purchased from us and/or contracts or leases you have entered into with us, as well as investments you have made into Mirastar-managed or sponsored vehicles.
- **Technical Data** includes internet protocol ("IP") address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website and other systems operated by us.
- **Profile Data** includes details of any interests, preferences, complaints or feedback you have communicated to us.
- **Usage Data** includes information about how you use our website and services.

- **Informational Material / Communications Data** includes your preferences in receiving informational materials and newsletters from us and your communication preferences.

We may also be required to process additional information about you in order to enable us to appropriately operate our business and promote our services effectively.

How we collect information about you

We will collect personal information directly from you. For example, you may give us your personal information by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal information you provide when you: (i) apply for our services or make investments with us; (ii) provide us with any personal details in connection with your tenancy at any of our properties; (ii) subscribe to receive our services, newsletters, informational materials or other publications; or (iii) provide us with any feedback or other communications.

As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies.

In addition, we may also collect information about you from other entities in our group and from other third parties, including but not limited to third party providers or sub-contractors of technical services and payment services, analytics providers, business partners, fund administrators, professional advisers, property managers, estate agents, credit reference agencies, background check agencies and other third parties which provide services in connection with the operation of our business.

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

Purposes for which we use your information

We will only use your personal information where we have lawful grounds for doing so. In most cases, we will use the information we hold about you in the following circumstances:

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

In sections (1) to (12) below we have set out a description of the ways we may use your personal information and the relevant lawful grounds for processing which we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Please note that we may process your personal information for 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 information where more than one lawful ground has been set out below.

- 1) **Purpose:** Registering you as a new investor / customer, including carrying out due diligence on you where this is required by law.

Lawful grounds for processing

- Necessary for the performance of a contract with you.
- Necessary to comply with our legal obligations.

- 2) **Purpose:** Registering you as a new tenant at any of our properties, including carrying out due diligence on you where this is required by law.

Lawful grounds for processing

- Necessary for the performance of a contract with you.
 - Necessary to comply with our legal obligations.
- 3) **Purpose:** Providing you or any relevant fund with services in connection with any contract which you or the relevant fund have entered into with us, including any services in connection with making any investment with us.

Lawful grounds for processing

- Necessary for the performance of our contract with you.
 - Necessary for our legitimate interests in operating our business effectively and providing services to you or to any relevant fund.
- 4) **Purpose:** Performing our obligations in connection with any lease which you have entered into with us in relation to any of our properties.

Lawful grounds for processing

- Necessary for the performance of our contract with you.
- 5) **Purpose:** Communicating with you for the purposes of providing services to you or any relevant fund or in connection with making any investment with us.

Lawful grounds for processing

- Necessary for the performance of our contract with you.
 - Necessary for our legitimate interests in operating our business effectively and promoting our services.
- 6) **Purpose:** Communicating with you in connection with any lease which you have entered into with us in relation to any of our properties.

Lawful grounds for processing

- Necessary for the performance of our contract with you.
 - Necessary for our legitimate interests in operating our business effectively and promoting our services.
- 7) **Purpose:** Managing our relationship with you, including but not limited to reviewing and responding to any communications or feedback submitted by you via our website or by post, phone, email or otherwise.

Lawful grounds for processing

- Necessary for the performance of a contract with you.
 - Necessary for our legitimate interests in operating our business effectively, promoting and improving our services and responding to any queries or complaints in relation to our services.
- 8) **Purpose:** Managing and collecting all applicable payments, fees and/or charges.

Lawful grounds for processing

- Necessary for the performance of our contract with you.
- Necessary for our legitimate interests in processing payments made by customers / investors and ensuring that we are able to recover all sums due to us.

- 9) **Purpose:** Administering and protecting our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).

Lawful grounds for processing

- Necessary to comply with our legal obligations.
- Necessary for our legitimate interests in running our business, ensuring the provision of administration and IT services, maintaining network security and preventing fraud.

- 10) **Purpose:** Processing any application submitted by you to subscribe to our newsletters and providing you with such newsletters as requested.

Lawful grounds for processing

- Necessary for the performance of our contract with you.
- Necessary for our legitimate interests in developing and promoting our services and growing our business.

- 11) **Purpose:** Providing you with informational materials and suggestions and recommendations about our services that may be of interest to you, as well as information about events that we may organise that may be of interest to you.

Lawful grounds for processing

- Necessary for our legitimate interests in developing and promoting our services and growing our business.

Informational Materials

We may use your personal information to provide you with information in relation to services provided by us that may be of interest to you. You will receive such informational materials from us if you have requested this. You may also receive such materials from us if you have purchased services from us or engaged in negotiations with us in connection with our services and, in each case, you have not opted out of receiving such materials.

You can ask us to stop sending you informational materials at any time by contacting our Data Privacy Team using the details set out below:

Mirastar Real Estate Investment Management Limited
Third Floor
The Monument Building
11 Monument Street
London
EC3R 8AF

DataPrivacyTeam@mirastar.eu

If you fail to provide information

Where we need to collect personal information by law, or under the terms of a contract we have with you and you fail to provide that information 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 services). In this case, we may have to cancel a service which we provide to you but we will notify you if this is the case at the time.

How long we will retain your information

We will retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or

disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

Third parties with whom we share your information

We may need to share your information with third parties who act on our behalf or provide services to us. Your personal information will be kept secure at all times and will only be shared with such third parties when necessary. Your information may be disclosed to the following third parties:

- Other entities in our group.
- Professional advisers (including but not limited to legal advisers and financial advisers), insurers, bankers, auditors, financial organisations and administrators.
- Providers of certain services and functions such as hosting and cloud services, production of investor notices and financial statements, providers of client relationship management, investment management, administration and domiciliation agency services, reporting software and other software used to meet business operation needs.
- Providers of certain services and functions such as property management services, estate agency services and other services and functions in connection with the management, administration and/or maintenance of any of our properties.
- Other third parties which provide services in connection with the operation of our business and the business of our managed / sponsored vehicles, including but not limited to IT and system administration services.
- Trade associates and business partners.
- Third parties with whom we may enter into negotiations in respect of a commercial agreement, e.g. a business sale or joint business venture.
- The UK Government or any other public authorities or regulatory authorities where we are obliged to do so by any applicable laws.

International data transfers

Please note that there may be instances where it may be necessary for us to transfer your information outside the European Economic Area, e.g. if we use third party service providers from another country. In these circumstances we shall put in place suitable safeguards to ensure that your information is held securely, such as the Model Contract Clauses. If you require further information about the safeguards put in place you can request it from us by contacting our Data Privacy Team using the details set out below:

Mirastar Real Estate Investment Management Limited
Third Floor
The Monument Building
11 Monument Street
London
EC3R 8AF

DataPrivacyTeam@mirastar.eu

Your rights in relation to your information

Under the GDPR, you have a number of rights in relation to your information which we respect and aim to uphold in everything we do. These include the following:

- You can ask us for a copy of the information we hold about you and a description of how we use that information ("subject access right").

- If you believe any information we hold on you may be inaccurate or incomplete, and you are unable to correct this information yourself, you can require us to rectify these inaccuracies ("right to rectification").
- You can require us to erase your information in certain limited circumstances ("right to erasure" or "right to be forgotten").
- Where we process your information using automated means on the basis of either your consent or to perform a contract, you can request that we supply such information to another party ("right to data portability").
- You can require us to restrict our use of your information or object to how it is used in certain limited circumstances ("right to restriction of processing").
- Where we process your information on the basis of our legitimate interests, you have the right to object to us processing your information in certain circumstances ("right to object to processing").
- If we process your personal information for the purposes of providing you with direct marketing, you have the right to object at any time to the processing of your personal information for such purposes ("right to object to processing – direct marketing").

In circumstances where we process your information on the basis of your consent, you have the right to withdraw your consent to the processing of your information at any time ("right to withdraw consent").

How to contact us

If you have any questions about how we use your personal information or you wish to contact us about your rights or if you have any complaints about our use of your information, please contact us at: DataPrivacyTeam@mirastar.eu

We will do our best to answer any question and resolve any complaint to your satisfaction. However, if you feel that we have not resolved your complaint, please note that you have the right to complain to the Information Commissioner's Office (in the United Kingdom) or other equivalent local data protection authority.

Please note that we may update this privacy notice at any time.