
1. Personal Data Protection Policy Statement

1. Introduction

- 1.1. Cromwell European REIT (“CEREIT”) is traded on the Singapore Exchange (SGX-ST:CNUU and SGX-SG:CSFU)
- 1.2. Cromwell EREIT Management Pte. Ltd. acts as the REIT Manager of CEREIT. Cromwell EREIT Management Pte. Ltd. and its subsidiaries shall be referred to as “CEREIT Manager”.
- 1.3. This document outlines the policy implemented by CEREIT and CEREIT Manager to manage the collection, usage and disclosure of personal data.
- 1.4. This Policy applies to
- 1.5. Cromwell EREIT Management Pte. Ltd. and all its Singapore-based employees
- 1.6. If there is conflict between this policy and current legislation, the latter shall prevail.

2. Purpose

- 2.1. Organisations that collect, use and disclose personal data are required to develop and implement policies and practices that are necessary for the organisation to comply with the Personal Data Protection Act 2012 (“PDPA”). The intention of the PDPA is to address the concerns from individuals about how their personal data is being used and maintain their trust in organisations that manage data.
- 2.2. The Manager will ensure that:
 - 2.2.1. only fair, proper and legitimate means are employed to collect personal data;
 - 2.2.2. personal data collected and used is accurate;
 - 2.2.3. personal data is protected by appropriate safeguards and made available only to authorised persons; and
 - 2.2.4. individuals have the right to access and request correction of their personal data.

3. Compliance with PDPA

- 3.1. CEREIT Manager is required to
 - 3.1.1. Develop and implement policies that are necessary to meet the obligations of the PDPA;
 - 3.1.2. Develop a process to receive and respond to complaints that may arise with respect to the application of the PDPA;
 - 3.1.3. Communicate to employees information about CEREIT Manager’s policies and practices; and

3.1.4. Make information available on request about the policies and practices and complaint process.

4. Personal Data Protection Principles

4.1. In handling personal data, CEREIT Manager abides by the following personal data protection principles:

4.2. Notification of purpose and consent

4.2.1. Unless otherwise required or permitted by law, CEREIT Manager will notify the individual of the purposes for which CEREIT Manager intends to collect, use or disclose personal data. This will occur on or before the time of the collection, use or disclosure. CEREIT Manager will limit the personal data collected to that which is necessary for, or related to, these purposes;

4.2.2. Unless otherwise required or permitted by law, CEREIT Manager will only collect, use or disclose personal data with consent; and

4.2.3. An individual may withdraw their consent for CEREIT Manager to collect, use and disclose their personal data.

4.3. Access and correction

4.3.1. Upon request, CEREIT Manager will provide an individual with access to their personal data and information about the ways in which their personal data may have been used or disclosed in the past year, as required or permitted by laws;

4.3.2. An individual may also verify the accuracy and completeness of their personal data, and request that it be amended, if appropriate. CEREIT Manager will respond to these requests in accordance with its personal data practices and policies and in accordance with the law.

4.4. Accuracy

4.4.1. CEREIT Manager aims to keep records of personal data accurate and up to date as is necessary to fulfil the purposes for which the data was collected and used. For this reason, individuals are required to update their personal data by informing CEREIT Manager of any changes promptly.

4.5. Safeguards

4.5.1. CEREIT Manager will protect personal data with security safeguards that are reasonable and appropriate to the sensitivity of the personal data, in order to protect it from unauthorized access, use or disclosure.

4.6. Retention

4.6.1. CEREIT Manager complies with applicable regulatory requirements with respect to the retention of personal data

4.7. Openness

4.7.1. CEREIT Manager has appointed designated individuals who are responsible for monitoring ongoing compliance with the PDPA.

4.7.2. CEREIT Manager will make information about personal data protection policies, practices and complaint process available to you through this Statement, and upon request

5. Personal Data

- 5.1. Personal data is defined in the PDPA as “data, whether true or not, about an individual who can be identified:
- 5.1.1. From that data; or
 - 5.1.2. From that data and other information which the organisation has or is likely to have access”.
- 5.2. Examples of personal data include:
- 5.2.1. Personal particulars, such as name, NRIC Number, Passport number or other personal identification number;
 - 5.2.2. Contact details such as your telephone number, email address, or fax number;
 - 5.2.3. Information about personal use of CEREIT’s websites and services, including cookies, IP addresses, subscription account details and membership detail; and
 - 5.2.4. Any other information relating to you which you have provided us in any form you may have submitted to us, or in other forms of interaction with individuals.
- 5.3. The provisions of the PDPA do not apply to the following categories of personal data:
- 5.3.1. Personal data about an individual contained in a record that has been in existence for at least 100 years;
 - 5.3.2. Personal data about a deceased individual who has been dead for more than 10 years; and
 - 5.3.3. Business contact information, which is defined as “an individual’s name, position name or title, business telephone number, business address, business email address, or business fax number or any other similar information about the individual, not provided by the individual solely for his personal purpose.”

6. How Personal Data is Collected

- 6.1. A non-exhaustive list of how data is collected:
- 6.1.1. When an individual contacts the CEREIT Manager via form submission on our website or through email;
 - 6.1.2. When an individual interacts with the CEREIT Manager during face to face meetings or through tele-conferencing;
 - 6.1.3. When an individual submits a job application
 - 6.1.4. When an individual asks to be included in an email or mailing list;
 - 6.1.5. When an individual responds to any market surveys conducted by the Manager;
 - 6.1.6. When an individual browses CEREIT’s website

7. How Personal Data is Used

- 7.1. The CEREIT Manager might use personal data to:
- 7.1.1. confirm personal identity
 - 7.1.2. confirm the accuracy of the information collected

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- 7.1.3. properly administer the services the CEREIT Manager provides
 - 7.1.4. communicate and respond to queries or instructions
 - 7.1.5. provide ongoing information and services
 - 7.1.6. make payments
 - 7.1.7. recover any debts owed to the CEREIT Manager
 - 7.1.8. detect, investigate and prevent fraud, or other unlawful or improper activities
 - 7.1.9. coach employees and monitor for quality assurance
 - 7.1.10. comply with all legal and regulatory requirements within and outside Singapore including disclosures to judicial, regulatory, government, statutory authorities and industry entities
 - 7.1.11. resolve complaints, and handle requests for data access or correction
 - 7.1.12. conduct compliance monitoring and audit reviews;
 - 7.1.13. compile statistics to design and improve services, or participate in industry exercises and studies;
 - 7.1.14. conduct research to understand current and future needs, for example, to conduct surveys and other forms of market research and analysis;
 - 7.1.15. perform any functions and activities related to products or services including but not limited to marketing, audit, reporting, research, analysis and finance;
 - 7.1.16. conduct checks with the National Do Not Call Registry and our internal Do Not Call Registry;
 - 7.1.17. comply with any contractual or other commitment or arrangement with local or foreign regulators, governmental bodies, or industry recognised bodies (whether within or outside Singapore) that is assumed by or imposed on us
 - 7.1.18. exercise any rights the CEREIT manager may have in connection with the provision of services;
 - 7.1.19. enable an actual or proposed assignee, transferee, participant or sub-participant of our rights or business to evaluate the transaction intended to be the subject of the assignment, transfer, participation or sub-participation;
 - 7.1.20. for any other purposes specifically provided for in any particular product or service offered by the CEREIT Manager or permitted or required by law or the relevant authorities.
- 7.2. If an individual is an Unitholder of CEREIT's units:
- 7.2.1. to administer the relationship, including the verification of your identity and/or the identity of your proxy (as may be applicable);
 - 7.2.2. to inform you of CEREIT's performance and any relevant information and disclosures through the sending of circulars, reports, newsletters and communications;
 - 7.2.3. to communicate changes and development to CEREIT policies, terms and conditions and other administrative information; and
 - 7.2.4. any other purpose relating to any of the above.
- 7.3. If an individual is a prospective job applicant:
- 7.3.1. to process the application including pre-recruitment checks;
 - 7.3.2. to provide or to obtain references for background screening/vetting;
 - 7.3.3. to collect information about an individual's suitability for the position applied for;
 - 7.3.4. to organise training and staff development programs;
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- 7.3.5.to assess on-the-job performance;
- 7.3.6.to administer benefits and payroll processing;
- 7.3.7.to provide tools to facilitate or as required to perform job function
- 7.3.8.to communicate with the individual as required by CEREIT to comply with its policies and processes, including for business continuity purposes; and
- 7.3.9.any other purposes relating to the aforesaid.

8. Whom Personal Data is Disclosed to

- 8.1. Personal data held by the CEREIT Manager will be kept confidential, but it may be disclosed or transferred such personal data to the following persons and/or entities (whether within or outside Singapore) for any of the purposes set out in paragraph below:
 - 8.1.1.any other purposes relating to the aforesaid.
 - 8.1.2.any person in connection with any claims made by or against or otherwise involving an individual in respect of any services;
 - 8.1.3.any agent, contractor or third-party service provider who provides administrative, consultative, telecommunications, computer, information technology, payment, data processing or storage in connection with the operation of our business, including any custodian, administrator, investment manager, investment advisor or distributor;
 - 8.1.4.any credit reference agencies or, in the event of default, any debt collection agencies;
 - 8.1.5.any financial advisor, bank partner, broker, introducer or other intermediary (including their employees);
 - 8.1.6.reinsurers (including proposed reinsurers) and medical service providers;
 - 8.1.7.any person which has undertaken to CEREIT's Manager to keep such personal data confidential;
 - 8.1.8.any person to whom the CEREIT Manager is under an obligation or otherwise required to make disclosure under the requirements of any laws, rules, regulations, codes of practice, guidelines or guidance binding on or applicable to us including but not limited to any local or foreign regulators, governmental bodies, or industry recognized bodies; or
 - 8.1.9.any person to whom are under an obligation or otherwise required to make disclosure pursuant to any contractual or other commitment or arrangement with local or foreign regulators, governmental bodies, or industry recognized bodies that is assumed by or imposed on us by reason of its financial, commercial, business or other interests or activities in or related to the jurisdiction of the relevant local or foreign regulators, governmental bodies, or industry recognized bodies.

9. Withdrawal of Consent

- 9.1. An individual may withdraw consent for CEREIT Manager to collect, use or disclose his / hers personal data for any purpose (e.g. send marketing messages) by contacting the CEREIT Manager directly. Upon receipt of notice to withdraw consent, the CEREIT Manager will inform of the likely consequences of the consent withdrawal. In some cases, withdrawing consent may

have an impact on CEREIT's ability to provide information and applicable services to the individual.

10. Transfer of Personal Data Outside Singapore

10.1. The CEREIT Manager operates its business in Singapore and for contractual, legal or business reasons, it may transfer personal data to service providers located outside of Singapore. CEREIT will use legally binding instruments and other safeguards to ensure that appropriate levels of protection necessary to maintain the security of personal data are in place and that any transferred personal data is processed only in accordance with the Act and any other applicable laws and regulations.

11. Use of Cookies

11.1. Cookies are small text files that may be automatically stored on a web browser that can be retrieved by CEREIT's website. The CEREIT Manager may use cookies to enable or enhance the functionality of the website, or to analyze visitor traffic for marketing or other purposes. CEREIT Manager may also use web analytic consultants to research certain usage and activities on parts of the website. Cookies can make our website more useful by storing information about your preferences, thus enabling us to provide a more personalised service.

11.2. Most web browsers are initially set to accept cookies. Individuals can adjust settings on their web browser so that they will be notified when receiving a cookie. If preferred, an individual can set your web browser to disable cookies. However, by disabling them, certain functions of the website might be disabled..

12. Changes to Statement of Personal Data Protection

12.1. This PDPA Statement is available on CEREIT's website. The CEREIT Manager reserves the right to modify or change this Policy at any time. The date as stated below indicates the last time this Statement was materially revised. If the CEREIT Manager makes any material changes to the Statement, it provide notification via update on CEREIT's website. The CEREIT Manager urges individuals to review this webpage periodically to read and understand latest policies regarding the handling of personal data.

Contact Information

The Data Protection Officer
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