

PGIM REAL ESTATE RETAIL PRIVACY NOTICE

LAST UPDATED: SEPTEMBER 2022

Tenant Personal Information Notice

In connection with the property at which we are your landlord, your landlord’s advisor and/or investment manager, and/or where we provide related services in connection with the property (“**Services**”), PGIM Real Estate¹ (“**PGIM**”) collects, processes and shares information that identifies you as an individual or relates to an identifiable individual (“**Personal Information**”). PGIM may have received this information from you or other entities (i.e., entities engaged in transactions concerning you, or who, at your request, provide commercial, financial, or occupational information, etc.).

SERVICES COVERED BY THIS PRIVACY STATEMENT

This Privacy Notice describes our practices solely in connection with information that we collect from tenants at properties where we are acting as a landlord or the landlord’s advisor and/or investment manager. This Privacy Notice does not apply to other services, relationships or activities that have their own privacy statements. For example, we have separate privacy policies for California residents and certain job applicants to our European affiliates and operations. Please refer to our online [Privacy Center](#) for more information about these other notices and the types of activities they cover.

PERSONAL INFORMATION

“**Personal Information**” is information that identifies an individual or relates to an identifiable individual, including, but is not limited to the following:

- Name
- Postal address
- Telephone number
- Email address
- Business contact information
- Employment and job history
- Personal financial information
- Government issued identification
- Credit information

You can find more information about the types of Personal Information we collect and use in the “How We Use Your Personal Information” section below.

¹ For the purposes of this notice PGIM Real Estate means, as necessary, PGIM Limited, PGIM Fund Management Limited, PGIM Real Estate Germany AG, Pramerica Property Investment GmbH, PGIM Real Estate Luxembourg S.A., PGIM, Inc., PGIM Real Estate France SAS, TMW USPF-Verwaltungs-GmbH, TMW ASPF Management GmbH, ASPF II Management GmbH, PLA Residential Fund III Manager, LLC; such entity that has the contractual relationship with you.

HOW WE COLLECT PERSONAL INFORMATION

We and our agents and service providers collect Personal Information in a variety of ways, including:

- **Through the Services and in connection with our Relationships.** For example, you may provide us with your name, address, email address, and telephone number when you visit one of our websites, register an account, attend one of our events, submit a request for information, or contact one of our advisors or representatives.
- **Indirectly.** We may collect Personal Information from you indirectly, such as when you participate in a transaction or contractual arrangement.
- **From Other Sources.** We receive Personal Information from other sources, for example:
 - Publicly available information or databases;
 - Your employer; and /or
 - The entity to which we provide the Services and from other third parties.

We need to collect and process Personal Information in order to provide the requested Services, in connection with our Relationships, or because we are otherwise legally permitted or required to do so. If you do not provide the information requested, we may not be able to provide the requested Services or meet the needs of parties to our Relationships. If you disclose any Personal Information relating to other people to us or to our service providers in connection with the Services or our Relationship, you represent that you have the authority to do so and to permit us to use the information in accordance with this Privacy Notice.

HOW WE USE PERSONAL INFORMATION

We and our service providers use Personal Information for a variety of legitimate business purposes, including:

- To provide the Services and fulfill your requests.
 - To provide the Services to you, such as providing real estate, and providing you with related customer service.
 - To respond to your enquiries and fulfill your requests when you contact us (for example, when you send us questions, suggestions, compliments, or complaints, or when you request a quote for other information about our Services).
 - To complete your transactions and provide you with related customer service.
 - To send administrative information to you, such as changes to our terms, conditions and policies.

We will engage in these activities to manage our contractual relationship with you and/or comply with a legal obligation.

- To aggregate and/or anonymise Personal Information.
 - We may aggregate and/or anonymise Personal Information so that it will no longer be considered Personal Information. We do so to generate other data for our use, which we may use and disclose for any purpose.

- To ensure compliance with statutory requirements such as “Know Your Customers” and anti-money laundering checks.
- To manage our client’s exposure to financial risk.
- To accomplish our business purposes.
 - For data analysis;
 - For audits, to verify that our internal processes function as intended and are compliant with legal, regulatory or contractual requirements;
 - For fraud and security monitoring purposes, for example, to detect and prevent cyberattacks or attempts to commit identity theft.

We need to collect and process Personal Information in order to provide the requested Services to our clients or because we are legally required to do so. If clients do not provide the information that we request, we may not be able to provide the requested services.

We engage in these activities to manage our contractual relationship with you, to comply with a legal obligation, and/or because we have a legitimate interest.

Without your Personal Information, we will be unable to provide you with some or all of the Services that you have requested.

HOW WE DISCLOSE PERSONAL INFORMATION

We disclose Personal Information:

- **To the appropriate PGIM organization or affiliate for the purposes described in this Privacy Notice.**
 - A listing of our affiliates and their locations can be provided by contacting your Client Service Representative or PGIMRealEstate.Privacy@pgim.com for a listing of our affiliates and their locations.
- **To our third-party service providers, to facilitate services they provide to us.**
 - These can include providers of services such as managing agents, valuers and other professional advisors, research houses and/or data aggregators, insurers, acquiring/selling agents, investors, banks/lenders, administrators, proptech providers, lawyers and other services.
- **To intermediaries and counterparties with which we may have dealings.**
 - These can include financial institutions, credit institutions, investors, tax authorities, insurers and consultants.
- **To customers’ service providers or customers.**
 - For our customers, these can include your custodians, fund administrators, insurers and consultants.
- **By using the Services, you may elect to disclose Personal Information.**
 - On other services to which you are able to post information and content (including,

without limitation, our Social Media Pages). Please note that any information you post or disclose through these services will become public and may be available to other users and the general public.

PGIM will make your Personal Information available to affiliated and non-affiliated third parties. We disclose Personal Information to our affiliated entities for the purposes described above, and, to the extent possible, limit access to those who have a need to access the information for the purposes for which it was collected and processed. Due to the global nature of our company operations, this includes transferring Personal Information to other countries. For example, we may transfer your Personal Information to affiliated entities located outside of your country, including the United States.

Certain Personal Information, additionally, is shared with third parties as required by law, for instance, by the anti-money laundering regulations or to provide you with the requested services.

The lists of affiliates, independent data controllers and data processors are updated continuously and readily accessed, free of charge, by requesting them from PGIM.

Some affiliates and third parties with which we share Personal Information are located in countries outside of the one in which you reside. Some of these countries are recognized by the European Commission as providing an adequate level of protection according to EEA standards (the full list of these countries is available here). With regards to transfers from the EEA to other countries, we have put in place standard contractual clauses adopted by the European Commission to protect your information. You may obtain a copy of these measures by contacting PGIMRealEstate.Privacy@pgim.com.

OTHER USES AND DISCLOSURES OF PERSONAL INFORMATION

We also use and disclose Personal Information as necessary or appropriate, especially when we have a legal obligation or legitimate interest to do so:

- **To comply with applicable law and regulations.**
 - This can include laws outside your country of residence.
- **To cooperate with public and government authorities.**
 - To respond to a request or to provide information we believe is necessary or appropriate.
 - These can include authorities outside your country of residence.
- **To cooperate with law enforcement.**
 - For example, when we respond to law enforcement requests and orders or provide information we believe is important.
- **For other legal reasons.**
 - To enforce our terms and conditions; and
 - To protect our rights, privacy, safety or property, and/or that of our affiliates, you or others.
- **In connection with a sale or business transaction.**
 - We have a legitimate interest in disclosing or transferring Personal Information to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock

(including in connection with any bankruptcy or similar proceedings). Such third parties may include, for example, an acquiring entity and its advisors.

OTHER INFORMATION

“**Other Information**” is any information that does not reveal a person’s specific identity or does not directly relate to an identifiable individual. We and our service providers collect Other Information such as:

- Browser and device information;
- Application usage data;
- Information collected through cookies, pixel tags and other technologies;
- Demographic information and other information provided by you that does not reveal a person’s specific identity; and
- Information that has been aggregated in a manner that it no longer reveals a person’s specific identity.

We and our service providers may collect Other Information in a variety of ways. Please refer to the Cookies and Similar Technology Statement in the Global Online Privacy Statement [here](#) for more information.

We may use and disclose Other Information for any purpose, except where we are required to do otherwise under applicable law. If we are required to treat Other Information as Personal Information under applicable law, then we may use and disclose it for the purposes for which we use and disclose Personal Information as detailed in this Privacy Notice. In some instances, we may combine Other Information with Personal Information. If we do, we will treat the combined information as Personal Information as long as it is combined.

HOW WE PROTECT YOUR INFORMATION

PGIM seeks to use reasonable organizational, administrative, and technical, measures to protect Personal Information within our organization. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us in accordance with the “Contacting Us” section below.

CHOICES AND ACCESS

Marketing communications

PGIM gives you choices regarding our use and disclosure of your Personal Information for marketing purposes. You may opt out from receiving marketing-related emails from us. If you no longer want to receive marketing related emails from us on a going-forward basis, you may opt out by clicking on the unsubscribe link (or equivalent link) at the bottom of one of our marketing emails, by reaching out to your client services representative, or by contacting us at: PGIMRealEstate.Privacy@pgim.com.

We will try to comply with your request(s) as soon as reasonably practicable. Please note that if you opt-out of receiving marketing-related emails from us, we may still send you important administrative messages, from which you cannot opt out.

How you can access, change, or delete your Personal Information

If you would like to request to access, correct, update, suppress, restrict, or delete Personal Information, object to the processing of Personal Information, or if you would like to request to receive a copy of your Personal Information for purposes of transmitting it to another company (in each case, to the extent these rights are provided to you by applicable law), you may contact us by sending an e-mail to PGIMRealEstate.Privacy@pgim.com or write to use at the following address: 655 Broad Street, Newark, NJ, 07102 Mail Stop: 08-19-70. We will respond to your request consistent with applicable law.

In your request, please make clear what Personal Information you would like to have changed, whether you would like to have the Personal Information suppressed from our database. For your protection, we may only implement requests with respect to the Personal Information associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable.

Please note that we may need to retain certain information for recordkeeping purposes, to meet legal obligations, and/or to complete any transactions that you began prior to requesting a change or deletion.

RETENTION PERIOD

We retain Personal Information for as long as needed or permitted in light of the purpose(s) for which it was obtained and consistent with applicable law.

The criteria used to determine our retention periods include:

- The length of time we have an ongoing relationship with you and provide the Services to you;
- Whether there is a legal obligation to which we are subject (for example, certain laws require us to keep records of certain transactions for a certain period of time before we can delete them); or
- Whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation, or regulatory investigations).

THIRD-PARTY SERVICES

This Privacy Notice does not address, and we are not responsible for, the privacy, information, or other practices of any third parties, including any third party operating any website or service to which the Services link. The inclusion of a link on the Services does not imply endorsement of the linked site or service by us or by our affiliates.

CROSS-BORDER TRANSFER

Personal Information may be stored and processed in any country where PGIM has facilities or in which we engage service providers, and by using the Services you understand that your information will be transferred to countries outside of your country of residence, including the United States, which may have data protection rules that are different from those of your country. In certain circumstances, courts, law enforcement agencies, regulatory agencies or security authorities in those other countries may be entitled to access Personal Information.

SENSITIVE INFORMATION

Unless specifically requested, we ask that you not send us, and you not disclose, any sensitive Personal Information (e.g., information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background or trade union membership) on or through the Services, our Relationships, or otherwise to us.

ADDITIONAL INFORMATION FOR THE EEA

Some non-EEA countries are recognized by the European Commission as providing an adequate level of data protection according to EEA standards (the full list of these countries is available [here](#)). For transfers from the EEA to countries not considered adequate by the European Commission, we have put in place adequate measures, such as standard contractual clauses adopted by the European Commission to protect Personal Information. You may obtain a copy of these measures by contacting your client services representative or at PGIMRealEstate.Privacy@pgim.com.

USE OF SERVICES BY MINORS

The Services are not directed to individuals under the age of eighteen (18), and we do not knowingly collect or post Personal Information from individuals under the age of eighteen (18).

EFFECTIVE DATE

This privacy statement is effective as of the “LAST UPDATED” legend above. We reserve the right to change this statement. If we change it, we will post the current privacy notice on this page. Any changes to this notice will be effective as of the day they are posted. Use of the Services following these changes signifies acceptance of the revised Privacy Notice.

CONTACTING US

Any questions about this Privacy Notice, please contact us at PGIMRealEstate.Privacy@pgim.com with your questions or comments or write to us at the following address: 655 Broad Street, Newark, NJ, 07102 Mail Stop: 08-19-70. We will respond to your request in accordance with applicable law.

ADDITIONAL INFORMATION REGARDING THE UK AND EEA

You may also:

- Lodge a complaint with an EU/EEA or the UK data protection authority for your country or region where you have your habitual residence or place of work or where an alleged infringement of applicable data protection law occurs. A list of data protection authorities in the EU/EEA is available at http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080 and information regarding lodging a complaint with the UK ICO can be found here: <https://ico.org.uk/make-a-complaint/>
- The contact information for our data protection officer (DPO) in Germany is as follows:

Jochen Geck
VIVACIS Consulting GmbH
Horexstraße 1 | ALTER GÜTERBAHNHOF
D - 61352 Bad Homburg
Telephone: +49 160 938 492 30
Email: jochen.geck@vivacis.de

ADDITIONAL INFORMATION REGARDING SINGAPORE

- The contact information for our data protection officer (DPO) in Singapore is as follows:

Cai Kuangyi, Director, Operational Risk Management

88 Market Street #43-06 CapitaSpring, Singapore 048948
Telephone: Main Office: +65 6735 2833
Direct Line: +65 6739 7234
Email: colin.cai@pgim.com