

# Grosvenor Americas– Privacy Notice

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## 1. Introduction

This Privacy Notice sets out how Grosvenor Americas (“GA”) obtains, uses and protects your personal information when carrying out its business activities. For the purpose of this Privacy Notice, ‘we’, ‘us’ and ‘our’ refers to one of the GA data controllers (which are listed in the Annex) and ‘you’ refers to you (the data subject).

## 2. Our use of personal data

### 2.1. If you purchase or rent one of our properties

#### 2.1.1. How do we collect personal information about you?

We collect information about you either:

- (i) when it is provided directly by you (e.g. when you send it to us via email, submit information on our apps or websites or when completing one of our paper or online forms or surveys); and/or
- (ii) from other sources:
  - a. brokers and/or legal advisors (who will pass to us information that you provided or they have obtained from public sources)
  - b. public sources (including via our background/risk screening companies)

#### 2.1.2. What personal information may we process about you?

We may process any or all of the following personal information that relates to you:

##### Information provided directly by you

- your name, date of birth, place of birth, gender and nationality;

- your email address, postal address, telephone and mobile number;
- your bank account and financial details;
- your passport, driving license or other government issued ID documents;
- personal and financial references;
- details relating to your purchase/lease and property, including contracts, payments, repairs, defect claims, insurance certificates, feedback and other correspondence;
- your marketing and other preferences and interests that you have expressed; and/or
- your photograph and opinions if you agree to participate in our digital communications and social media campaigns to promote Grosvenor as a landlord

#### **Information from other sources**

- Public information/media reports regarding sanctions you may be subject to, your activities (for example, your corporate appointments, any financial difficulties and criminal or civil court cases) and any political exposure
- Information about your interaction with our websites, social media pages, applications and emails if you visit or receive them, including via cookies that may be set on your device. See our Cookie Notice for more information.

#### **2.1.3. Why we may use your personal information**

We may process your personal information for the following purposes:

- sending you electronic marketing communications about Grosvenor properties and related news and events that we believe may be of interest to you, provided we have received your consent to do so;
- managing and administering the property sale negotiation and agreement, including payment of the sale price on completion of the purchase and related accounting and administrative activities;
- carrying out our Know Your Client/background and risk checks relating to you prior to you entering into the sale (including sanctions, anti-money laundering, financial and credit checks);
- carrying out our obligations under and enforcing the terms of the sale agreement and managing any post-sale issues;
- collating with data of other purchasers of our and third-party properties to analyze and compare property market, trends and performance of residential unit sales in different areas;
- complying with any applicable present or future law, rule, regulation, guidance or directive, and complying with any applicable industry or professional rules and regulations or any applicable voluntary codes;
- complying with demands or requests made by government and law enforcement authorities, and complying with court orders (or equivalent), or in connection with any litigation; and/or

- activities connected with any sale, merger, acquisition, disposal, reorganization or similar change of our business or its assets

#### **2.1.4. Whom we may share your personal information with**

In addition to the third parties described in the “Common Data Sharing” section below, we may share your personal information with any of the following recipients as may be necessary or desirable for the purposes described above:

- our service providers (for example, those who provide our marketing and IT systems/services, background/risk screening and accounting);
- our lenders and joint venture partners who may require oversight of purchases and leases relating to their investments; and/or
- the public if you agree to participate in our digital communications and social media campaigns promoting Grosvenor as a landlord

Such recipients will be under an obligation to protect the confidentiality and security of that personal information (unless otherwise required by law).

#### **2.1.5. Retention of your personal information**

If you started the process of purchasing a residential property with us (even if it did not complete), we will generally hold your personal information on our systems up to 10 years following the end of residential sales for that property.

If you contacted us but did not start the sales process, we will only retain your data until the end of residential sales for that property.

In either case, we may continue to hold your personal information for longer periods in accordance with our IT backup procedures or for legal, accounting and/or financial reasons.

## **2.2. If you (or your organization) engage with our community or development projects**

### **2.2.1. How do we collect personal information about you?**

We often engage with the communities in which our or our partner or client’s properties are located to help improve surrounding areas or inform our property developments. When doing so, we may collect information:

- when you or an organization you belong to provides it to us when communicating with us or attending one of our, our client or our partner’s events;
- from public sources, such as from an organization’s website or publications, news and social media and other publicly available sources; and
- from third party online engagement platforms which we or our clients and partners use to display information about our development (the platform tends

to control this information and share some or all of it with us as development company in accordance with their privacy policy)

### **2.2.2. What personal information may we process about you?**

We may process any or all of the following personal information that relates to you:

- Your name, title, phone, email
- Organizations and roles
- News, opinions, preferences and feedback

### **2.2.3. Why we may use your personal information**

We may use the information we collect about you to:

- Provide you with important information about our developments (where you are a tenant or another stakeholder)
- Invite you to events that we think will be of interest to you (where you requested this or provided consent)
- Ensure that we provide a consistent and effective contact with you and others
- Inform and aid our projects and developments

### **2.2.4. Whom we may share your personal information with**

In addition to the third parties described in the “Common Data Sharing” section below, we may share your personal information with any of the following recipients as may be necessary or desirable for the purposes described above:

- our service providers (for example, those who provide or help us to manage our PR, community engagement or IT systems)

They will be under an obligation to protect the confidentiality and security of that personal information (unless otherwise required by applicable law).

### **2.2.5. Retention of your personal information**

Your personal data is retained for the duration of our relationship with you as a contact or until the development is completed. It may be retained for longer if necessary for legal reasons.

## **2.3. If you work for one of our business partners (e.g. an investor, supplier or a real estate vendor/purchaser)**

### **2.3.1. How do we collect personal information about you?**

We will collect information that you will provide to us in the course of business with the organization(s) or person(s) you represent. This may include information provided by you or your employer during our business partner and supplier

onboarding/set up process and due diligence or, in the case of an investor, when you create an account on our investment portal.

We may collect information from background or risk screening companies and public sources when conducting due diligence on executives, shareholders, beneficiaries and other key persons relating to our investors, vendors, suppliers and other business partners as part of our due diligence/KYC processes.

We may also access contact information that is in the public domain, such as from an organization's website or publications or other resources in which companies choose to publish their business contact information.

### **2.3.2. What personal information may we process about you?**

We may process any or all of the following personal information that relates to you:

- Name, contact information, role and organization;
- Bank account details (if we need to pay you);
- Invoice details, including bills/timesheets (if you are working for us);
- Events you may have attended;
- Your advice, opinions, preferences and areas of interest;
- If you are a key person in the organization:
  - Signature on contractual documents;
  - Tax and financial details;
  - Passport, driving licence or other government issued ID documents;
  - Professional profiles (CVs, LinkedIn, corporate biographies, references etc.);
  - Directorships and shareholdings;
  - Adverse media, sanctions and political exposure reports;
- If you are working on our sites: details relating to health and safety, signature on documents, trade union membership, expenses

### **2.3.3. Why we may use your personal information**

We may use the information we collect about you to:

- ensure you and your employer are suitable counterparties
- manage our relationship with you or your company as our business partner or supplier;
- pay you or your employer (where applicable);
- managing and administering our investor agreements and relationships;
- complying with applicable present or future law, rule, regulation, guidance or directive, and complying with any applicable industry or professional rules and regulations or any applicable voluntary codes; and/or
- inform you about Grosvenor news and activities and/or invite you to events which we think will be of interest to you (where you have requested this, we are permitted by law or you have provided consent)

#### **2.3.4. Whom we may share your personal information with**

In addition to the third parties described in the “Common Data Sharing” section below, we may share your personal information with any of the following recipients as may be necessary or desirable for the purposes described above:

- our service providers (for example, those who provide or help us to manage our IT systems, business communications and risk screening companies)

They will be under an obligation to protect the confidentiality and security of that personal information (unless otherwise required or permitted by applicable law).

#### **2.3.5. Retention of your personal information**

Your personal data is retained for the duration of our relationship with you as a contact or your organization. However, we may continue to hold your personal information for longer periods in accordance with our IT backup procedures or for legal, accounting and/or financial reasons.

If you are an investor or an employee of an investor, please see the [Grosvenor Americas Investor Privacy Policy](#) for more information.

### **2.4. If you visit our websites or use our apps**

#### **2.4.1. What personal information is collected?**

We may collect and process the following personal information:

- *All visits:* Details of access to our websites and applications including: time/date, traffic, and location data, technical data (such as browser or application version, device and operating system, internet service provider, IP addresses and cookie IDs) and details of the pages accessed and how you accessed them.
- *If you ask us to contact you using our webform:* First and last name, email address, telephone number and postcode and details of your correspondence with us.
- *If you request or consent to receive marketing from us:* Details of preferences for marketing events or materials you wish to receive. See the section of this privacy notice titled “If you agree to receive email marketing from us” for more information.
- *If you engage with us to purchase or rent one of our properties, input into one of our development proposals or work with us:* Additional details may be collected – see the other sections of this privacy notice.

Our websites and apps include links to external websites / platforms provided by third parties, such as social networks (e.g. Facebook and Twitter). It will be clear from the link or its URL which third party is providing the external website/platform. They may collect personal information if you choose to interact with those links,

including via cookies. Please see their privacy and cookie notices for more information.

#### **2.4.2. How is this personal information collected?**

Details of access to our websites and apps are automatically collected as you use them (that is, gathered without you actively providing the information). This collection is done by using various technologies and means, such as cookies and navigational data collection. You can alter how or if you receive certain cookies via your web browser settings and other tools.

Your other details are collected when you choose to provide them. For example, by using our web form or by making a purchase.

#### **2.4.3. Why we may use your personal information**

We may use the information we collect about you to:

- Provide our websites and applications to you, and where applicable customising them to your preferences.
- Respond to your queries and provide you with the information about our products and services that you request from us (including via email or SMS where such contact details have been provided);
- Improve the content of our websites and applications to ensure that content is presented in the most effective manner for you and for your computer;
- Notify you of any important information relating to our websites, applications or your purchases; and
- Administer our websites and applications and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.

#### **2.4.4. When we may disclose your personal information**

In addition to the third parties described in the “Common Data Sharing” section below, we may share your personal information with any of the following recipients as may be necessary or desirable for the purposes described above:

- our service providers (for example, the companies providing our websites and analytic services and delivering purchased products to you); and
- our payment partners (who handle your credit/debit card details when making a purchase; we do not process this data and they will handle it in accordance with their privacy policy which should be made available to you at the time of payment).

All third parties to whom we transfer personal information relating to you will be under an obligation to protect the confidentiality and security of that personal information (unless otherwise required by applicable law).

#### **2.4.5. How long will we hold your personal information**

We will retain your personal information for as long as necessary to fulfil your request, such as to provide marketing information where requested, and to satisfy our legal obligations (such as requirements to retain details of commercial transactions).

Website/application analytics information is not generally accessible to us in a personalised form and is held in accordance with our analytics provider's retention practices. See our [Cookie Notice](#) for more details.

### **2.5. If you are a visitor to one of our offices, properties or construction sites**

#### **2.5.1. How do we collect personal information about you?**

We may collect personal data in several ways including:

- Directly from visitors in advance of their visit to our buildings;
- Directly from visitors on arrival at one of our buildings;
- From employees in advance of visitors' arrival to our building; and/or
- CCTV cameras

#### **2.5.2. What personal information may we process about you?**

We may collect the following types of personal information:

- Name of visitor;
- Email if provided by staff member on our room booking system;
- Contact phone number for each visitor;
- Date of visit, arrival time and departure time;
- Name of staff member who had arranged the meeting; and
- CCTV data of you passing and entering our site and premises

#### **2.5.3. Why we may use your personal information**

We are collecting personal information to ensure we know who is in our building in the event of an evacuation, such as a fire or fire drill.

We process CCTV footage to:

- prevent unauthorised access to our buildings
- improve health and safety
- protect your interests (or the interests of others) in the event of criminality such as a theft, physical or verbal abuse or criminal damage.

#### **2.5.4. Whom we may share your personal information with**

In addition to the third parties described in the “Common Data Sharing” section below, we may share your personal information with any of the following recipients as may be necessary or desirable for the purposes described above:

- our service providers (for example, those who provide or help us to manage our IT, events and CCTV)

They will be under an obligation to protect the confidentiality and security of that personal information (unless otherwise required by applicable law).

#### **2.5.5. Retention of your personal information**

Your personal information will be processed for the duration of your visit and for a reasonable period thereafter. CCTV data is wiped after 30 days unless a request has been made by a data subject or other authorised party to review the data. In that case, the data is retained until the query has been completed.

### **2.6. If you purchase a property from a developer with whom we are working**

#### **2.6.1. How do we collect personal information about you?**

We may need visibility of sale information for developments managed by developers to whom we have lent money.

#### **2.6.2. What personal information may we process about you?**

We may process any or all of the following personal information that relates to you:

- your name;
- your email address, postal address, telephone and mobile number; and/or
- purchase price / rent and related contract

#### **2.6.3. Why we may process your personal information**

We process your personal information to verify the developer has entered into a genuine sale or lease contract.

#### **2.6.4. Whom we may share your personal information with**

In addition to the third parties described in the “Common Data Sharing” section below, we may share your personal information with any of the following recipients as may be necessary or desirable for the purposes described above:

- our service providers (for example, those who provide our marketing and IT systems/services, background/risk screening and accounting)

They will be under an obligation to protect the confidentiality and security of that personal information (unless otherwise required by law).

#### **2.6.5. Retention of your personal information**

We will generally retain your data until the project is complete and the developer has sold all available residential units in the development property. However, we may continue to hold your personal information for longer periods in accordance with our IT backup procedures or for legal, accounting or financial reasons.

#### **2.7. Use of anonymised data by us or our service providers**

We (or our third-party service providers on our behalf) may process your personal information in order to generate anonymous statistical information and we may use this for any purpose (including strategic business planning or management decisions).

We also generally allow our third-party service providers (such as those providing cloud IT services to us) to process your personal information to generate anonymous statistical information to improve their products and services.

We may also receive anonymous reports and analysis from third-party service providers that have been prepared using personal information that they or their business partners collect about you (for example, footfall analysis). Those third parties are responsible for providing notice and obtaining consent where required by applicable data protection laws.

We (or third-party processors on our behalf) may process your personal information in order to generate anonymous statistical information and we may use this for any purpose (including strategic business planning or management decisions).

We also generally allow our third-party process (such as those providing cloud services to us) to process your personal information to generate anonymous statistical information in order to improve their products and services.

We may also receive anonymous reports and analysis from third party data controllers that have been prepared using personal information that they or their business partners collect about you (for example, footfall analysis). Those third parties are responsible for providing notice and obtaining consent where required by applicable data protection laws.

## **3. Common Data Sharing**

In addition to the specific data sharing explained above, we (and our third party service providers) may share your personal information with any of the following recipients:

- for the purposes explained above, other Grosvenor organizations and their respective employees;

- for financial, audit and professional services: our banks, investors, insurers, auditors and advisors;
- entities connected with any sale, merger, acquisition, disposal, reorganization or similar change of our business or its assets; and
- for any legal, regulatory or law enforcement matters:
  - local and foreign regulators, governments and law enforcement authorities; and
  - local and foreign courts, tribunals and arbitrators, other judicial committees and enactments of laws

## 4. Your rights regarding the personal information you provide to us

Depending on your location and/or the location of the Grosvenor Americas company responsible for your data (see Annex), you may have rights concerning your personal information and our handling of such information under applicable privacy and data protection laws. These rights may include:

- A right to receive information about our processing of your personal information, such as what is collected, where it is obtained from, what it is used for, whether it is disclosed and to whom;
- A right to receive a copy of such personal information in a structured, commonly-used and machine-readable format;
- A right to correct inaccurate or incomplete personal information;
- A right to require us to stop or to restrict our processing (including transfer to third parties) of your personal information (particularly where unlawfully used or obtained);
- A right to require the deletion of your personal information once it is no longer necessary in relation to the purposes for which the personal information was collected or is being processed;
- A right to “opt out” of the sale of your personal information to a third party (although, as we do not sell your personal information to third parties, this right will not be applicable to us); and
- A right to receive equal service and pricing even if you exercise your rights under Californian privacy laws (where applicable)

We confirm that we do not sell your personal information to third parties, and only share aggregated information as described in this Privacy Notice.

If you wish to exercise any of these rights, or if you have a complaint about how we manage your personal information, please contact us using the details in the Contact section below.

## 5. Security Warnings

Please note that messages you send to us by e-mail or via any internet connection may not be secure. If you choose to send any confidential information to us by such means you do so at your own risk with the knowledge that a third party may intercept this information and we do not accept any responsibility for the security or integrity of such information.

Please also take time to consider the legitimacy of any communications purporting to be from us or third parties working on our behalf. Do not respond to requests for payment or click on links unless you know they are not malicious. If in doubt, please contact us via other means.

## 6. Contact

If you have any questions, comments or requests regarding any aspect of these privacy notices, please contact our Data Protection Officer by email at: [dataprotectionGGL@grosvenor.com](mailto:dataprotectionGGL@grosvenor.com).

Should you not be satisfied with our response and remain concerned your personal data is not being processed in accordance with relevant US and Canadian federal and state/provincial privacy law, you may also have the option of raising the matter with your local government organization/regulator responsible for privacy matters, such as:

- Canada: Office of the Privacy Commissioner of Canada (<https://www.priv.gc.ca/en/>)
- California: Office of the Attorney General, California Department of Justice (<https://oag.ca.gov/privacy>)

*April 2022*

### ***Annex***

#### ***Grosvenor Companies/Data Controllers***

**Canada:** Grosvenor Canada Limited of 1040 W. Georgia Street, #2000, Vancouver BC V6E 4H1

**America:** Grosvenor USA Limited of California Street, Suite 2500, San Francisco CA  
94111