

DATA PROTECTION INFORMATION FOR BUSINESS PARTNERS

(Date last amended: 29 October 2024)

TABLE OF CONTENTS

1.	WHO DOES THIS DATA PROTECTION STATEMENT APPLY TO?	2
2.	DATA CONTROLLER AND DATA PROTECTION OFFICER	2
3.	CATEGORIES OF PERSONAL DATA THAT ARE PROCESSED	3
4.	HOW DO WE OBTAIN THE PERSONAL DATA THAT WE PROCESS?	3
5.	PURPOSE AND LEGAL BASES OF THE PROCESSING	3
6.	CATEGORIES OF RECIPIENTS OF PERSONAL DATA.....	5
7.	AUDIO AND VIDEO CONFERENCES.....	6
8.	DATA TRANSMISSIONS TO RECIPIENTS OUTSIDE THE EUROPEAN ECONOMIC AREA	7
9.	DATA RETENTION PERIOD	7
10.	DO PERSONAL DATA HAVE TO BE MADE AVAILABLE?	8
11.	RIGHTS OF THE DATA SUBJECTS.....	8
12.	IS AUTOMATED DECISION-MAKING OR PROFILING USED?.....	9
13.	INFORMATION ON JOINT CONTROLLERSHIP PURSUANT TO ART. 26, SEC. 2, SENT. 2, GDPR	9
14.	AMENDMENTS TO THE DATA PROTECTION INFORMATION.....	10

Note: Wherever we use solely the masculine or the feminine form for personal references and person-based nouns in this document for the sake of an easier reading experience, such phrasing principally refers to any gender within the meaning of equal treatment.

1. WHO DOES THIS DATA PROTECTION STATEMENT APPLY TO?

We, the company Trei Real Estate GmbH or one of our German member companies of the Trei Group (hereinafter "Trei" for short or "we" or "us") maintain a business relationship with you, your employers or your client, which situation covers both the initiation and the implementation of contractual relationships within the scope of our business activities. For instance, the scope of business relations could include the commissioning or performance of construction and upkeep works, services in the area of consultancy or IT infrastructure or supply performance in the heating and energy sector.

We might act either as principal and client or as service provider in this context. The same goes for you, your employer or your client. Moreover, we might have relations with you, your employer or your clients within the framework of marketing/client acquisition activities.

Within the scope of the aforementioned activities, Trei may process a variety of personal data. That is why we will brief you pursuant to Art. 13, GDPR, or, if no data are directly collected, pursuant to Art. 14, GDPR, about the processing of personal data within the scope of our day-to-day business activities. In addition, we will communicate separate data protection statements to cover certain activities (e.g. relating to our Internet presences or to tenancies) and the processing of personal data in the respective contexts.

Which exact data are processed in each case and in which manner they are used depends on the nature of the business relationship, service or activity on our side. Accordingly, not all of the information below may apply to you.

2. DATA CONTROLLER AND DATA PROTECTION OFFICER

The data controller within the meaning of Art. 4, No. 7, GDPR, is principally

Trei Real Estate GmbH
Klaus-Bungert-Str. 5b
40468 Düsseldorf, Germany

+49 211 54011-000
info[at]treirealestate.com

In line with the division of labour among the Trei Group member companies, the awarding and execution of assignments could also cause other functional companies or property holding companies of Trei to act as joint controllers within the meaning of Art. 26, GDPR. Which exact companies these are in a given case is specified in the contract documents.

The main information on joint controllership will be made available to you in this Data Protection Statement under item 13., below, pursuant to Art. 26, Sec. 2, Sent. 2, GDPR.

Use the contact details below to reach out to our data protection officer:

Tengelmann Audit GmbH
Data Protection Officer
An der Pönt 45
40885 Ratingen, Germany

E-mail: datenschutz@t-audit.de

3. CATEGORIES OF PERSONAL DATA THAT ARE PROCESSED

According to Art. 4, No. 1, GDPR, personal data means any information that relates to a natural person (the “data subject”) and that can be directly or indirectly attributed to that person.

The scope of our business activities generally requires the processing of various personal data.

Depending on the activity and the nature of a given case, these could be data of different categories, assuming the information permits inferences regarding a natural person. Examples:

- General master data (e.g. name and salutation, title, job title)
- Information regarding creditworthiness or credit rating
- Customer relationship data (such as customer histories, payment information, status, other master data)
- Information regarding scheduled appointments with us (place, date, etc.)
- Information we are legally obliged to collect and process, e.g. pursuant to Art. 11, Sec. 4 and 5, German Money Laundering Act (GwG)
- Communication contents (e.g. from personal, phone or written/electronic communications)
- Contact details (such as phone number, email address, postal address)
- Billing data
- Technically necessary information to ensure IT security or the provision/use of electronic communication or platforms, such as IP address or user data.

Provided it does not conflict with the purpose of processing or legal constraints, is technically feasible and requires no disproportionate effort, we always strive to work with pseudonymised or even anonymised data.

4. HOW DO WE OBTAIN THE PERSONAL DATA THAT WE PROCESS?

Whenever we process your personal data, we generally received the data directly from you (e.g. via contact forms, e-mail signatures, business cards, etc.), from your employer, client or other business contacts (e.g. in the wake of recommendations).

In addition, we also process personal data that we received or collected from legitimate other sources. This could be any of various sources, such as: company websites, commercial registers, address databases, company directories or social media specialising in business contacts. Furthermore, we may also receive data from other market participants, e.g. through recommendations.

5. PURPOSE AND LEGAL BASES OF THE PROCESSING

We always process personal data as part of our business activities in compliance with the provisions of the GDPR and all other definitive data protection laws and regulations. As a rule, processing is done for one or more of the subsequently listed purposes and on the authority of the legal bases mentioned:

a) Fulfilment of (Pre- and Post-)Contractual Obligations within the Scope of Business Relations

If we have a direct contractual relationship with you as a person or if we are in the process of negotiating a contract (e.g. for the provision or use of a service), we will process your personal data on the basis of Art. 6, Sec. 1, Lit. b, GDPR, (fulfilment of (pre-)contractual obligations).

If you are not a contractual partner yourself, but the contractual relationship exists with a legal entity, for instance, then personal data will be processed—if necessary—in order to initiate, fulfil or terminate a business relationship on the basis of our legitimate interest in accordance with Art. 6, Sec. 1, Lit. f, GDPR. The economic fulfilment of our business objective and the mutual fulfilment of

contractual obligations arising from our business relationships constitutes both our own legitimate interest and—at least to some extent—the legitimate interest of our business partners.

In this context, your personal data may also be processed in connection with the optimisation of our internal business processes or customer satisfaction, e.g. as part of the active and system-supported management of business relationships or the electronic recording of documents. Our legitimate interest in this case is to ensure an efficient and effective economic operation, but also to ensure the contentment of our business partners and employees.

b) Generating New, and Strengthening Existing, Business Ties

We regularly implement all sorts of measures to generate new business contacts and to strengthen existing ones. The measures are generally based on Trei's legitimate interest to generate, strengthen and promote business activities (legal basis Art. 6, Sec. 1, Lit. f, GDPR). The associated measures may include the following activities, among others:

- Adding and updating data to/in our contacts database (e.g. from business cards given to us at trade fairs)
- Advertising and/or direct marketing
- Extending invitations to exhibitions and events as well as managing events and attendees.

For marketing measures, personal data may have to be processed on the basis of your prior consent pursuant to Art. 6, Sec. 1, Lit. a, GDPR. In this case, we will separately request your consent and notify you accordingly. Once you granted your consent, you have the right to withdraw your consent at any time without giving a reason. To do so, please use the contact details provided when you granted your consent or get in touch with the general contact provided above in item 2.

c) Fulfilling Legal Obligations

We are subject to various legal obligations, such as tax laws, commercial-law requirements or regulations governed by the German Money Laundering Act (GWG). Within the scope of fulfilling the various obligations, we may also process personal data, e.g. when fulfilling the statutory retention and reporting requirements. Whenever we have to process personal data in order to fulfil our legal obligations, Art. 6, Sec. 1, Lit. c, GDPR, (in conjunction with the respective legal standard for the specific obligation) constitutes the legal basis for processing personal data. This applies, for instance, when fulfilling our general due diligence obligations under the GWG, according to which we may be obliged to process personal data in certain situations for the purpose of identifying contractual partners or beneficial owners. Whenever processing of personal data is not expressly prescribed in the respective legal standard, but is necessary to fulfil the respective legal obligations, we base such processing on our legitimate interest pursuant to Art. 6, Sec. 1, Lit. f, GDPR, to fulfil the legal requirements.

d) Internal Quality Assurance, IT- and Network Safety, Compliance or Internal Audits

We regularly take steps to ensure internal quality assurance, IT and network security while also running compliance or audit checks and, depending on the findings, will take further steps to clarify or improve the respective situation. In this context, your personal data may also be processed, e.g. in conjunction with random checks.

Underlying these steps is a legitimate interest in accordance with Art. 6, Sec. 1, Lit. f, GDPR, to take them in order to ensure safe, efficient and effective processes at a quality level necessary to satisfy certain economic aspects. On top of that, we have a legitimate interest in safeguarding, enforcing and/or defending our legal interests, ensuring compliance with the legal framework and preventing and investigating cases of fraud and misuse. Certain legal obligations constitute another legal basis for such measures pursuant to Art. 6, Sec. 1, Lit. c, GDPR, depending on the case at hand.

e) Risk Mitigants

As part of the initiation/implementation of business relationships, we may process personal data to enable us to assess and reduce business risks. For instance, we may run credit checks in order to prevent collection losses. In addition, we may carry out due diligence risk assessments within the framework of corporate transactions, possibly in collaboration with external lawyers. Whenever personal data are processed during such measures, the legal basis is either the implementation of (pre-contractual) measures (Art. 6, Sec. 1, Sent. 1, Lit. b, GDPR), a legal obligation (Art. 6, Sec. 1, Sent. 1, Lit. c, GDPR) or our legitimate interest in minimising business risks (Art. 6, Sec. 1, Sent. 1, Lit. f, GDPR).

f) Other Operational Purposes and Legitimate Interests

In addition to the aforementioned purposes, there are other legitimate reasons for processing personal data, each of which is based on the corresponding legitimate interest on our part or that of a third party unless the legitimate interests of the data subjects prevail. This may include the following processing purposes:

- Anonymising information to permit extended evaluation without any possible personal reference.
- Responding to request for information and clarifying facts and circumstances
- Providing/using electronic communication or platforms
- Conducting corporate transactions effectively and efficiently
- Compiling and evaluating international reporting figures or metrics e.g. to have better control over cost effectiveness or to achieve sustainability objectives
- Asserting legal claims and defending the company in legal disputes
- Ensuring the safety and preservation of buildings and facilities
- Ensuring the safety and stable operation of our IT systems as well as the continued development of these measures
- Exercising our domiciliary rights, supporting visitor management and access controls.

g) Consent-Based Processing

If we process personal data on the basis of consent in accordance with Art. 6, Sec. 1, Lit. a, GDPR, we will request your consent separately and brief you on the processing purposes in this context, among other things. Once you have granted your consent, you have the right to withdraw your consent at any time without giving a reason. To do so, please use the contact details provided when you granted your consent or get in touch with the general contact provided above in item 2.

6. CATEGORIES OF RECIPIENTS OF PERSONAL DATA

As is custom in general business operations, we also use third-party service providers from time to time, or may have to transmit information to public-sector entities in order to fulfil our contractual and legal obligations. Personal data will be transferred to third parties in this context only if doing so is necessary for the aforementioned purposes and is permitted by law, or if prior consent was granted. In data protection terms, a third party may count either as commissioned data processor on our behalf pursuant to Art. 4, No. 8, GDPR, or as controller in its own right pursuant to Art. 4, No. 7, GDPR.

The selection and use of third-party service providers is carried out by us in consideration of internal minimum data protection standards and the relevant legal requirements (e.g. the conclusion of applicable contracts pursuant to Art. 28, GDPR, for commissioned data processors).

Personal data may principally be transmitted to the following categories of recipients:

- advisory and consulting firms
- service provider for the disposal of records and data carriers
- printing services
- IT and telecommunication services
- banks and payment service providers
- suppliers, specialist firms, installers, tradesmen, contractors, architects, etc.
- logistics and postal services
- marketing services and advertising agencies
- public sector entities and institutions (e.g. land registries, law enforcement agencies, courts of law, state offices for statistics, social security authorities) or debt collection services, lawyers, notaries or administrators as necessary in a given case
- associates
- chartered accountants and/or auditors, tax consultants.

7. AUDIO AND VIDEO CONFERENCES

We use various online conferencing tools to communicate with our business partners. The tools we use are listed at the bottom of this section. When using online video or audio conferences, your personal data will be processed both by us and by the respective service provider.

For the processing of personal data within the scope of electronic communication, the respective providers of the video/audio conferencing services are subject to telecommunications secrecy pursuant to Part 2 of the German Teleservices Data Protection Act (TDDSG) and are responsible for the processing accordingly. Please note that we only have limited control over the data processing by the tools used. Rather, it depends strongly on the guidelines of a given service provider. For more information on the data processing by said tools, see the privacy statements for the tools used which you will find under the links we set at the bottom of this section.

In accordance with current data protection legislation, we are responsible for any further processing that results from the communication via said video/audio conferencing services (e. g. via the invite function, video recordings or document exchange). Accordingly, the video/audio conferencing services we use act as commissioned data processor for us in this context.

When in use, the conference tools will collect all data that you provide/enter in order to use the tools (e-mail address and/or your telephone number). In addition, the conference tools will process the duration of the conference, the start and end (time) of conference attendance, the number of participants and other "context information" connected to the communication process (metadata). The providers of the tools will moreover process all technical data required for implementing the online communication. This includes specifically IP addresses, MAC addresses, device IDs, device type, operating system type and version, client version, camera type, microphone or loudspeaker and the type of connection.

Contents uploaded or provided within the tool will be stored on the providers' servers. This may include recordings, text messages (chats), voicemails, photos, videos, files, whiteboards and other information shared during the use of such tools.

At any time during a session, it is up to you to decide whether your camera and/or microphone should be switched on or off. Moreover, it is up to you to decide whether or not to share contents, and you may abort the sharing of contents at any time. It may also be possible for participants to make a recording of the session during an online meeting using the respective conferencing tool. Whenever this option is used, you will be directly notified about the recording and you may object to the recording via-à-vis the meeting participants. After the online meeting, the recording will be saved by the tool's provider and can be shared with other participants.

We use conference tools to communicate with prospective or existing business partners and to discuss the implementation of contractual/business relationships (on the legal basis of Art. 6, Sec. 1, Lit. b, GDPR, or our corresponding legitimate interest pursuant to Art. 6, Sec. 1, Lit. f, GDPR). Moreover, we use the tools to generally simplify and accelerate your communication with us or with our companies (legitimate interest within the meaning of Art. 6, Sec. 1, Lit. f, GDPR). If your consent was requested, the tools in question will be used on the basis of your consent; you may revoke your consent at any time with effect to the future.

The data stored by us via video and conferencing tools will be deleted from our systems if you ask us to delete them, if you revoke any consent you may have granted regarding their storage or if the purpose for storing them ceased to exist. This will not affect the observance of compelling statutory retention periods. If the tool operator placed any cookies, these will remain on your endpoint until you delete them. We have no influence on the storage period of any data that the conferencing tool operators stored for their own purposes. Detailed information regarding this aspect can be obtained directly from the respective conferencing tool operators.

These are the conferencing tools we use:

Microsoft Teams

We use Microsoft Teams. This service is provided by Microsoft Ireland Operations Limited, One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, Ireland. For details on its data processing policy, please see the privacy statement of Microsoft Teams:

<https://privacy.microsoft.com/en-us/privacystatement>

Processing of personal data is principally not intended whenever Teams is used in third countries (states outside the European Union and the European Economic Area) because Microsoft has agreed to limit the storage location to data centres inside the European Union. However, we cannot rule out the possibility that data are routed via Internet servers located outside the EU. This may specifically be the case whenever the participants of a meeting are located in a third country.

Microsoft uses EU standard contractual clauses to ensure an adequate level of data protection when processing/transferring personal data to third countries (e.g. the United States). Microsoft Corporation, the parent company of Microsoft, is domiciled in the United States of America. The United States are subject to an adequacy decision by the European Commission as to the EU-US Data Privacy Framework, assuming that a given company has been certified accordingly. The US parent company of Microsoft has been certified accordingly. More details on the subject are available under the link below:

<https://www.dataprivacyframework.gov/participant/6474>.

8. DATA TRANSMISSIONS TO RECIPIENTS OUTSIDE THE EUROPEAN ECONOMIC AREA

The transfer of personal data to so-called third countries (countries outside the European Economic Area where the GDPR does not apply) or an international organisation is restricted and is only tolerated in exceptional cases, provided an adequate level of data protection has been ensured or if it is permitted in exceptional cases in accordance with Art. 49, GDPR. An adequate data protection level would, for example, be assured by the existence of a valid adequacy decision by the European Commission pursuant to Art. 45, GDPR, or by appropriate safeguards pursuant to Art. 46 et seq., GDPR (e.g. EU standard contractual clauses and additional protective measures).

9. DATA RETENTION PERIOD

We will process and store personal data as long as doing so is necessary for the aforementioned purposes and/or for the sake of complying with legal obligations and fulfilling all mutual claims. Legal obligations

arise on a regular basis from substantiation and retention requirements as mandated, e.g., by the German Commercial Code (HGB) or the German Fiscal Code (AO). According to these legal codes, retention period can be as long as ten years. It may also be necessary to retain personal data for as long as it takes to have claims asserted against us (with statutory limitation periods of up to 30 years possibly applying in certain cases).

10. DO PERSONAL DATA HAVE TO BE MADE AVAILABLE?

An obligation to disclose personal data may arise from contracts already or yet to be concluded insofar as doing so is necessary for the contract's conclusion or performance. In addition, statutory obligations may also necessitate the collection/processing of personal data. While the disclosure of personal data is voluntary in principle, please note that, depending on a given case, we may not be able to engage in certain business activities if the relevant data are unavailable.

11. RIGHTS OF THE DATA SUBJECTS

If we process your personal data in our function as controller, you have the following rights vis-à-vis us with regard to the processing of your personal data, which rights you may assert at any time using the contact details listed above under item 2., above, or vis-à-vis your contact person at our company:

Right to Information, Rectification and Erasure

Within the scope of the applicable legal provisions, you have the right to free information (Art. 15, GDPR) about your processed personal data and other disclosures pursuant to Art. 15, Sec. 1, Lit. a through h, GDPR, at any time. In addition, you may be entitled to the rectification (Art. 16, GDPR) or erasure (Art. 17, GDPR) of these data. The right to erasure may be restricted in cases specified in Art. 17, Sec. 3, GDPR (e. g. whenever the data are required for asserting, exercising or defending legal claims).

Right to Restriction of Processing

You have the right to demand that the processing (Art. 18, GDPR) of your personal data be restricted (or blocked). The right to restriction of processing exists in the cases specified in Art. 18, Sec. 1, Lit. a through d, GDPR. Once the processing of your personal data has been restricted, such data may—apart from being stored—only be processed with your consent or else to assert, exercise or defend legal claims, or for to protect the rights of another natural person or legal entity, or for reasons of material public interest of the European Union or one of its member states.

Right to Data Portability

You have the right to receive personal data concerning you in a standard machine-readable format, assuming that you have provided us with the data yourself, that we process these data via automated procedures and that the processing is based on your consent or the fulfilment of a contract with you (Art. 20, GDPR).

Right to Object to the Processing of Your Data

If we process your data on the basis of legitimate interests in accordance with Art. 6, Sec. 1, Lit. f, GDPR, or for the performance of a public task (Art. 6, Sec. 1, Lit. e, GDPR) and if reasons against any processing arise from your personal situation, you have the right to object to the processing pursuant to Art. 21, Sec. 1, GDPR. The same applies to profiling supported by the same legal basis quoted, where applicable. If you file an objection, your personal data will no longer be processed unless we can substantiate compelling reasons worthy of protection for processing your data which outweigh your interests, rights and freedoms, or unless the processing serves the assertion, exercise or defence of legal claims.

If your personal data are processed for the purpose of direct marketing, you have the right to object at any time to the processing of your personal data for the purpose of such marketing; this applies even to profiling if it is associable with direct marketing of this kind.

To object, address an informal note to the contact person listed under item 2., above. However, we would prefer you to directly approach your contact person on our side to ensure optimal processing of your request. Doing so will ensure that your request is swiftly and properly processed.

Right to Lodge a Complaint with a Regulator

If you believe that the processing of your personal data violates data protection law, you have the right to lodge a complaint with a regulator, specifically in the member state of your habitual residence, place of work or place of the alleged violation (Art. 77, GDPR). The right to lodge a complaint exists without prejudice to any other administrative or judicial remedy.

Whenever data subject rights are asserted, personal data will be processed in this same context in order to respond to the request. In this case, personal data are processed to fulfil a statutory obligation pursuant to Art. 6, Sec. 1, Lit. c, GDPR, or on the basis of our legitimate interest pursuant to Art. 6, Sec. 1, Lit. f, GDPR, to implement the data protection regulations that govern the rights of data subjects.

12. IS AUTOMATED DECISION-MAKING OR PROFILING USED?

No, we do not use automated decision-making based on personal data nor do we engage in profiling. Whenever exceptional cases prompt us to deviate from this rule, we shall notify you separately about the fact.

13. INFORMATION ON JOINT CONTROLLERSHIP PURSUANT TO ART. 26, SEC. 2, SENT. 2, GDPR

The member companies of the Trei Group practice division of labour (e.g. as property companies and service companies), combining the specific competences of each company in order to achieve optimal outcomes for the respective companies and for their business partners. For instance, a property asset holding company will normally act as contractual partner of business partners whereas Trei Real Estate GmbH, being the central service company, handles the administrative and operational implementation of the business relationship. To perform their task, the various companies will, as a rule, jointly define the purposes of processing and the means to achieve them, and will constantly exchange information during the collaborative performance of their services. Accordingly, the companies process personal data as "joint controllers" within the meaning of Art. 26, GDPR.

What are the implications for data subjects within the meaning of the GDPR?

Notwithstanding the fact that joint controllership is in place, we shall fulfil our obligations under data protection law according to our respective competences for each of the relevant process stages. In addition, the following has been agreed:

- We shall make the information required pursuant to Articles 13 and 14, GDPR, available to data subjects free of charge in a precise, transparent, comprehensible and easily accessible form and in plain and simple language, this Data Protection Statement being part of the effort.
- Each company will provide all information that is needed in this context to the other company. We will promptly notify each other about legal positions asserted by data subjects, and will make all information that is necessary to answer requests for information, or to process the request, available to the company that was contacted by the data subject.

- Each company involved may be approached for the purpose of asserting data subject rights. In this context, Trei Real Estate GmbH will act as central contact point, and its contact details are listed under Section 2., above.
- All controllers have appointed one and the same data protection officer. The latter's contact details are listed under Section 2., above.

If you would like to have more information on the joint controllership you are welcome to contact us or else the data protection officer.

14. AMENDMENTS TO THE DATA PROTECTION INFORMATION

Since our business activities and processes are subject to change, we will therefore have to amend our data protection statements as well on such occasions. If the purposes of the processing for which we originally collected your personal data were to change, we would notify you of the fact. In addition, you will find the latest version of this Data Protections Statement at:

https://www.treirealestate.com/medien/downloads/datenschutzinformation_geschaeftpartner/Data_Protection_Information_For_Business_Partners_October_2024.pdf.

Naturally, you may always get in touch with us if you have any question or require more information.