



# YEW GROVE

REIT PLC

## SHAREHOLDER PRIVACY NOTICE

(“PRIVACY NOTICE”)

1 OCTOBER 2020

Yew Grove REIT plc (“**Yew Grove**”) takes the privacy of its shareholders seriously and in its commitment to protecting your privacy, Yew Grove aims to comply at all times with the EU General Data Protection Regulation 2016 and the Data Protection Act 2018 (together “**GDPR**”).

This Privacy Notice explains how Yew Grove processes the personal data of its shareholders in accordance with GDPR requirements and will apply former and current shareholders of Yew Grove.

For the purposes of the GDPR, Yew Grove is the data controller of your personal data, which means that Yew Grove decides how it processes personal data about you. Some of our staff and third party service providers will process personal data on our behalf. Yew Grove will only process your personal data in accordance with applicable data protection laws, adhering to GDPR principles.

Yew Grove may from time to time amend this Privacy Notice to reflect any changes to GDPR and the way it processes your personal data. Yew Grove will issue a new privacy notice when it makes any material changes and may notify you in other ways about the processing of your personal data.

You can request a copy of this Privacy Notice at any time by emailing Yew Grove’s data protection contact (details below).

### *What personal data is processed?*

For a number of practical and legal reasons, Yew Grove may collect and process data relating to you during the course of Yew Grove’s relationship with you as a shareholder.

The type of personal data that we process about you includes, but may not be limited to:

- your name and contact details, including your address, phone number and email address;
- your date of birth and your nationality;
- your bank account details, including your account number and sort code;
- your tax details;
- a statement of the shares held by you in Yew Grove and the amount paid on the shares;
- details regarding dividend, interest or any other sums paid to you where relevant;
- the date on which you were entered onto Yew Grove’s share register;
- the date on which you cease to be a shareholder in Yew Grove; and
- any other personal information you have provided directly to us.

### *How does Yew Grove receive your personal data?*

Some of the personal data Yew Grove receives will be received directly from you, however, most of the information is obtained from:

- Link Registrars Limited ("**Link** Yew Grove's appointed share registrar, situated at 2 Grand Canal Square, Dublin 2, D02 A342; and
- Orient Capital (Pty) Limited (London branch) ("**Orient**"), who provide ownership analytics services to Yew Grove, situated at 65 Gresham Street, London, EC2V 7NQ.

Yew Grove have entered into an agreement with Link and Orient, which outlines the share registration and associated services they provide, as well as their responsibilities and obligations in processing your personal data under GDPR.

### *How will your personal data be used?*

Yew Grove, and other third party service providers on our behalf, may hold personal data about former and current shareholders to enable them to complete a number of obligations, including but not limited to:

- maintaining and administering the Company's register of members, including a register of legal and beneficial owners for tax and jurisdictional purposes or facilitate shareholder consultations or proxy solicitation;
- manage the registration and certification of share transfers;
- to prepare, print and distribute dividend or interest payments and dividend share certificates, as well as to reconcile dividend bank accounts;
- to respond to shareholder enquiries and engage with shareholders on company issues or to attend investor or corporate governance roadshows;
- to prepare, print and distribute circulars, notices and company documents to shareholders of upcoming general meetings;
- any reorganisation of Yew Grove's share capital that may impact shareholder's rights;
- to comply with Yew Grove's obligations under Market Abuse Regulations;
- anti-money laundering and fraud prevention, investigation and detection;
- to maintain records of member meetings, votes cast and resolutions put forward;
- to provide voting and proxy services;
- to identify and report on Yew Grove's shareholders to assist in understanding shareholder requirements and attracting new investors;
- instituting or defending legal claims;
- to facilitate business restructuring or a transfer or sale of assets of the business; and
- filing annual returns and associated financial statements with the Companies Registration Office.

### ***What are the legal justifications for processing your personal data?***

Yew Grove rely on the following grounds for possessing your personal data:

- contractual necessity for the proper administration of Yew Grove's obligations under its contract with you, which allows Yew Grove to effectively manage all aspects of the shareholding lifecycle;
- to comply with legal and regulatory requirements in Ireland;
- consent, in instances where you have given Yew Grove permission to process your information;
- a legitimate business interest of Yew Grove, to effectively develop and operate the Yew Grove's business, for risk management and pursuing corporate and social responsibility objectives.

Where Yew Grove rely on a legitimate business interest for processing personal data, the legitimate business interest will not be superseded by your own interests, rights and freedoms.

Some of the abovementioned grounds for processing personal data will overlap and there may be more than one ground to justify the use of your personal data by Yew Grove or its third party service providers.

### ***Will Yew Grove share any personal data?***

Yew Grove will share personal data with certain third party recipients for the reasons set out above. The applicable third party service providers include: investment advisors, share registrars, depositary, alternative investment fund manager, financial service providers and intermediaries, regulatory bodies and local government departments and service providers Yew Grove engage for professional services, such as legal advisors and external auditors.

Yew Grove will only disclose your personal data to a third party service provider if it is necessary for that third party to provide their service and provided that Yew Grove has an agreement in place with them requiring that they keep your personal data safe and that it is used for the intended purpose only. Yew Grove will ensure that those third party service providers have adequate policies/procedures in place and that they adhere to the required data security standards, policies and procedures.

Yew Grove may be required to share your personal data with other third parties in the context of the possible sale or restructuring of the business, which may entail providing information to a regulator or to otherwise comply with Yew Grove's legal obligations.

### ***How is personal data stored and what security measures are in place to keep it safe?***

Your personal data is stored electronically on Yew Grove's secure servers and/or in paper copy form in locked filing cabinets with restricted access. Yew Grove has robust technical and organisational security measures and procedures in place to protect your personal data from unauthorised access or disclosures, improper use, destruction and accidental loss or alteration.

Yew Grove restricts access to your personal data to those employees and third party service providers who have a business need to know and those persons will only process your personal data on senior management's instructions. Those persons will at all times be subject to a duty of confidentiality.

### ***How does Yew Grove respond in the event of a data security breach?***

Yew Grove has procedures in place to swiftly identify the cause of a suspected or actual breach and in the case of an actual breach, contain and mitigate the consequences. Yew Grove will also take steps to prevent future occurrences of similar breaches of security and will notify you and the Data Protection Commissioner where legally required to do so.

### *How long will Yew Grove retain personal data?*

Yew Grove will keep your personal data for as long as you are a shareholder in Yew Grove and for a period of time after you cease to be a shareholder in order to comply with Yew Grove's legal obligations and to deal with any claims or disputes that may arise in relation to your shareholding.

### *What are my rights as a data subject?*

Subject to certain exemptions, you have various rights under GDPR, which include:

- the right to request that Yew Grove confirm whether or not it processes any personal data about you and to be provided with copies of your personal data at any time (“**Subject Access Request**”). Yew Grove must respond within one month to a Subject Access Request. Yew Grove are permitted to extend the one month time response period by an additional two months where your Subject Access Request is complex or voluminous;
- the right to request that Yew Grove provide soft (electronic) copies of your personal data or that Yew Grove forward them to another person specified by you;
- the right to have your personal data updated and corrected where it is inaccurate;
- the right to have your personal data deleted where it is no longer required, provided that Yew Grove do not have any continuing lawful obligation to process your personal data;
- the right to request Yew Grove to refrain from processing your personal data where it relies on legitimate business interests as a lawful reason for the processing of your data and you believe that the processing of your personal data by Yew Grove is unwarranted or unlawful;
- the right to withdraw your consent where Yew Grove have relied upon consent as a lawful basis for processing personal data;
- the right not to be subject a solely automated decision, including profiling;
- the right to object to Yew Grove using your information for direct marketing purposes; and
- the right to lodge a complaint to the Data Protection Commissioner (<https://dataprotection.ie/>) if you are concerned about the way Yew Grove have processed your personal data

### *Who is the data protection contact?*

If you have any questions or wish to exercise any of your rights, please address your request in writing to the Company Secretary, Yew Grove's data protection contact, by email at [compliance@ygreit.com](mailto:compliance@ygreit.com) or by post to First Floor, 57 Fitzwilliam Square, Dublin 2, Ireland, D02 CP02.

Please note, Yew Grove may need to request additional information from you in order to process a request, such as to confirm your identity and ensure your right to access the information. Such measures are considered reasonable and appropriate to ensure that personal data is not disclosed to any person who has no right to receive it.