

VASTNED RETAIL N.V. PRIVACY POLICY

Effective date: 8 June 2023

INTRODUCTION

This is the Privacy Policy of Vastned Retail N.V. (**'Vastned'** or the **'Company'**). Vastned is a listed European retail property company. Vastned has its registered office at Mercuriusplein 11 in 2132 HA Hoofddorp, the Netherlands, and is listed in the Commercial Register of the Dutch Chamber of Commerce under number 24262564.

Vastned processes personal data. This means inter alia that we collect, store and transmit personal data.

Vastned is the controller for the processing of your personal data.

1. CONTENTS AND STATUS OF THE PRIVACY POLICY

- 1.1 Your privacy is important to us. This Privacy Policy explains how Vastned processes personal data. This includes the purposes for which we process personal data and the grounds on which our processing is based. It also explains to whom we provide personal data, how long we retain personal data and how we protect these data.
- 1.2 This Privacy Policy also contains important information about your rights regarding the processing of your personal data. We advise you to read this Privacy Policy carefully.
- 1.3 This Privacy Policy has been adopted by the Executive Committee and Executive Board of Vastned Retail N.V. on 8 June 2023 and is effective as of 8 June 2023.
- 1.4 This Privacy Policy applies to Vastned and its group companies, with the exception of Vastned Belgium NV and its subsidiaries.
- 1.5 This Privacy Policy is reviewed annually and amended following developments in laws and regulations related to privacy that apply to the Company.
- 1.6 This Privacy Policy will be published on the website of the Company.

2. HOW DO WE COLLECT YOUR PERSONAL DATA?

- 2.1 We can collect your personal data in a number of ways:
 - 2.1.1 directly from you, e.g. when you contact us directly or when you provide your data to us;
 - 2.1.2 from third parties who provide the data to us, for example when you are employed by such parties;
 - 2.1.3 from other sources, such as the Land Registry, the Commercial Register, commercial databases and other public sources;
 - 2.1.4 directly from you when you visit our website: vastned.com;
 - 2.1.5 by means of cookies; please see our Cookie Policy.

3. FOR WHAT PURPOSES DO WE PROCESS PERSONAL DATA AND ON WHICH GROUNDS IS PROCESSING OF PERSONAL DATA BASED?

- 3.1 The overview hereafter lists for what purposes we process personal data and on which grounds processing of these is based:

PROCESSING PURPOSE	LEGAL GROUNDS
to enter into or perform an agreement with you, e.g. to contact you	necessary for the conclusion and the performance of an agreement
to comply with statutory or tax obligations	necessary to comply with statutory or tax obligations or necessary for a legitimate interest of Vastned or of a third party
to inform you about our activities, e.g. to send you press releases	necessary for a legitimate interest of Vastned or of a third party or based on your consent
to bring our activities to your attention, e.g. to invite you to an event, lunch or drinks	necessary for a legitimate interest of Vastned or of a third party or based on your consent
to answer your questions and respond to your requests, or deal with your complaints	necessary for a legitimate interest of Vastned or of a third party or necessary for the conclusion and the performance of an agreement
to enable you to make use of all functionalities of our website and to improve them	necessary for a legitimate interest of Vastned or of a third party
for your job application	necessary for a legitimate interest of Vastned or of a third party
in the event of disputes with Vastned	necessary for a legitimate interest of Vastned or of a third party or necessary for the conclusion and the performance of an agreement

3.2 If we process your personal data based on your consent, you can withdraw it at any time. For this, you may contact Peggy Deraedt, Director Legal at Vastned (postal address PO Box 22276, 1100 CG Amsterdam, the Netherlands) or by email on privacy@vastned.com or by telephone on + 31 20 24 24 300.

4 WITH WHOM DO WE SHARE YOUR PERSONAL DATA?

4.1 We sometimes share your personal data with third parties who do work for us. These may include technical managers and experts, maintenance companies, IT service providers, website providers, valuers, real estate agents, insurers, financiers, legal/tax service providers and recruiters. We may share personal data with purchasers of assets. We may also share your personal data with companies affiliated with Vastned. We may have a legal obligation to pass on personal data.

4.2 We will ensure that appropriate measures are taken to secure your personal data when we pass them on to third parties. Such measures may include entering into a processing agreement.

5 HOW LONG DO WE STORE YOUR PERSONAL DATA?

5.1 We keep personal data as long as is necessary to achieve the purposes for which they have been collected.

5.2 The General Data Protection Regulation does not determine specific storage periods for personal data. Other legislation may specify minimum storage periods, which we must comply with. Such legislation includes the general requirement for businesses to keep records, as set out in the Dutch

Civil Code and tax laws. Personal data may be kept longer for various reasons, such as for risk management purposes, for security reasons or so that claims, investigations or legal proceedings can be handled properly. The specific terms are listed in our record of processing activities.

6 HOW DO WE PROTECT YOUR PERSONAL DATA?

- 6.1 All staff members of Vastned with access to your personal data are bound by a confidentiality agreement.
- 6.2 We will take the necessary administrative, technical and organisational measures to ensure a security level that is appropriate for the specific risks we have identified. We protect your personal data against destruction, loss, alteration, unauthorised disclosure of or access to personal data that is sent, stored or otherwise processed.
- 6.3 Furthermore, we endeavour to keep your personal data accurate and up to date. For this reason, we kindly request that you inform us of any changes to your personal data (such as your contact details).

7 WHAT ARE YOUR RIGHTS AND HOW CAN YOU EXERCISE THEM?

- 7.1 You are entitled:
 - 7.1.1 to information about and inspection of your personal data;
 - 7.1.2 to correction of your personal data;
 - 7.1.3 to deletion of your personal data (the 'right to be forgotten');
 - 7.1.4 to limit the processing of your personal data;
 - 7.1.5 to object to the processing of your personal data;
 - 7.1.6 to receive your personal data in a structured, current and machine-readable format, and to transfer this personal data to another controller.
- 7.2 These rights may be limited in certain situations. For example when we have a statutory obligation to process your personal data.
- 7.3 Before you can invoke these rights, you will first have to identify yourself sufficiently for us to confirm your identity.
- 7.4 If you want to exercise your rights, please contact Peggy Deraedt, Director Legal at Vastned (postal address PO Box 22276, 1100 CG Amsterdam, the Netherlands) or by email on privacy@vastned.com or by telephone on + 31 20 24 24 300.
- 7.5 If you have registered to receive our press releases and you no longer wish to, you can unsubscribe on the page '(un)subscribe to newsroom', which you can find on the vastned.com website under the heading 'newsroom'.

8 AMENDMENTS, COMPLAINTS AND QUESTIONS

- 8.1 This Privacy Policy may change, for example when new developments give rise to this. The most recent version of this Privacy Policy is always available from our website: vastned.com. We recommend that you regularly consult this Privacy Policy so that you are aware of any changes. You can also ask us to send you a copy of the most recent version of this Privacy Policy. We will do so free of charge.

- 8.2 We are happy to assist you if you have a complaint about the processing of your personal data. You also have the right to lodge a complaint with the privacy regulator: in the Netherlands with the Dutch Data Protection Authority using the complaint form of this Authority, in France with the Commission Nationale de l'Informatique et des Libertés (CNIL), and in Spain with the Agencia Española de Protección de Datos (AEPD).
- 8.3 If you have any questions, remarks or complaints about this Privacy Policy or about the processing of your personal data, please contact Peggy Deraedt, Director Legal at Vastned (postal address PO Box 22276, 1100 CG Amsterdam, the Netherlands) or by email on privacy@vastned.com or by telephone on + 31 20 24 24 300.