

# Privacy Policy

## **1. Processing of personal data**

This privacy notice applies for (i) visitors to our website [www.urban.partners](http://www.urban.partners), (ii) contact persons at customers, suppliers, business partners etc., and (iii) event participants.

## **2. Data controller and contact information**

Urban Partners Management Company S.A. is the data controller for the processing of your personal data as described in this privacy policy.

The data controller's contact details are:

Urban Partners Management Company S.A.  
Company reg. no. B 186049  
16-18, Boulevard Royal, 5th Floor  
L-2449 Luxembourg  
E-mail: [privacy@nrep.com](mailto:privacy@nrep.com)  
Phone: +45 30 57 45 23

## **3. Overview of the processing activities**

In this section you can read about the categories of personal data, which we collect, and for what purposes they are being processed. Furthermore, you can read about the legal basis for the processing of personal data and the retention period in the specific processes mentioned.

<b>Processing activity</b>	<b>Personal data</b>	<b>Purpose of the processing activity</b>	<b>Legal basis</b>	<b>Retention period</b>
Cookies	Website visitors: Consent state, page visits, average time spent on website, pages read, page requests, IP-address, device-ID.	(i) Ensuring the functionality of the website  (ii) Statistical and analytical purposes	(i) Our legal basis for processing your personal data is our legitimate interest in providing you with a fully functional website, cf. GDPR article 6(1)(f).  (ii) Our legal basis for processing your personal data is your consent, cf. GDPR article 6(1)(a).	We store your personal data in accordance with the expiration dates stated in the cookie banner.
Contact persons (including customers, contacts with suppliers and business partners etc.)	Name, employer, title, address, phone numbers, e-mail address, whether customer/supplier/business partner	Maintaining ongoing relationships with (potential) customers, suppliers or business partners	Our legitimate interests in communicating and maintaining our relationship with the (potential) customers, suppliers or business partners, respectively, cf. GDPR article 6(1)(f).	The personal data are stored for as long as they are relevant for the relationship with the relevant customer, supplier or business partner and for the establishment, exercise or defense of legal claims.
Event participants	Name, e-mail address, title, company name and photo	Hosting events and branding	Our legal basis for processing your ordinary personal data is our legitimate interest in administrating and hosting events as well as branding Urban Partners, cf. GDPR article 6(1)(f). We will always inform in advance that photos will be taken at these events.	Participation lists are deleted immediately after the event has been held. Photos are deleted after a period of 3 years from the time they were published.

## **4. Sources**

As a general rule, the personal data are collected directly from you or from your device.

## **5. Recipients of the personal data**

We disclose your personal data to our data processors, who host and provide support for our IT systems. In connection with branding activities, we may disclose your personal data on our websites or social media profiles.

Furthermore, we may also disclose personal data gathered via cookies to our third-party cookie providers. Such third-party cookie providers may use personal data about you collected via cookies for their own purposes. You can find further information on our third-party cookie providers, and find their respective privacy policies, in the cookie banner.

## **6. Joint data controllership**

We may sometimes host events together with other parties. In these cases, we have a joint data controllership with the external party related to the processing of personal data in connection with invitations to the event, administrating the participant list and hosting the event. Thus, we transfer your personal data as described above to the external party, with whom we host the event.

We are responsible for providing you with information in accordance with GDPR Art. 13 and 14, and thus, details about the processing, including what personal data is processed, for what purpose and what legal basis as well as retention period is described above.

If you have questions regarding your rights, or if you wish to make use of your rights, you can contact us via the contact information stated in section 2 of this privacy policy.

## **7. Transfer of personal data to third countries**

When we disclose personal data about you to third party cookie providers, we may also transfer your personal data to third countries in which these third parties operate, such as USA. Our legal basis for the transfers in question is the EU Commission's adequacy decision regarding the USA and the third-party providers' subsequent certifications under the EU-US Data Privacy Framework.

## **8. Your rights**

Subject to the conditions set out in the applicable data protection legislation, you enjoy the following rights:

- The right to request access to the personal data
- The right to rectification of inaccurate personal data and to have incomplete personal data completed
- The right to erasure of the personal data
- The right to restriction of processing of the personal data
- The right to object, on grounds relating to your particular situation, at any time to processing of personal data which is based on Art. 6(1)(f) of the GDPR, or if we process your personal data for direct marketing purposes. If you object, we must no longer process the personal data unless we demonstrate compelling legitimate grounds for the processing, which override your interests, rights and freedoms or if processing is necessary for the establishment, exercise or defense of legal claims.

### **Right to withdraw consent**

Where the processing of personal data is based on your consent, you also have the right to withdraw your consent at any time by using the contact information provided in section 2 of this privacy policy. If you withdraw such consent, this will not affect the lawfulness of the processing prior to the withdrawal.

**Right to lodge a complaint to the supervisory authority**

You have the right to lodge a complaint with the relevant supervisory authority:

<b>For Denmark</b> Danish Data Protection Agency (in Danish: <i>Datatilsynet</i> ) <a href="http://www.datatilsynet.dk">www.datatilsynet.dk</a>	<b>For Sweden</b> Swedish Authority for Privacy Protection (in Swedish: <i>Integritetsskyddsmyndigheten (IMY)</i> ) <a href="https://www.imy.se/">https://www.imy.se/</a>	<b>For Norway</b> Norwegian Data Protection Agency (in Norwegian: <i>Datatilsynet</i> ) <a href="http://www.datatilsynet.no/">www.datatilsynet.no/</a>
<b>For United Kingdom</b> Information Commissioner's Office <a href="http://www.ico.org.uk">www.ico.org.uk</a>	<b>For Poland</b> Polish Data Protection Agency (in Polish: <i>Urząd Ochrony Danych Osobowych</i> ) <a href="http://www.uodo.gov.pl">www.uodo.gov.pl</a>	<b>For Germany</b> The Hessian Commissioner for Data Protection and Freedom of Information ( <i>Der Hessische Beauftragte für Datenschutz und Informationsfreiheit</i> ) <a href="http://www.datenschutz.hessen.de">www.datenschutz.hessen.de</a>
<b>For Finland</b> Finnish Data Protection Ombudsman (in Finnish: <i>Tietosuojavaltuutetun toimisto</i> ) <a href="http://www.tietosuoja.fi/etusivu">www.tietosuoja.fi/etusivu</a>	<b>For Luxemburg</b> Luxembourgian National Commission for Data Protection (in French: <i>Commission nationale pour la protection des données</i> ) <a href="http://www.cnpd.public.lu/fr.html">www.cnpd.public.lu/fr.html</a>	