

**EU DATA PROTECTION NOTICE FOR BUSINESS PARTNERS
(suppliers, customers, service providers, landlords, tenants, vendors)**

The General Data Protection Regulation (the “**GDPR**”) and applicable national data protection law(s) (together the “**Data Protection Laws**”)¹ impose certain obligations on Phoenix Tower International Investments LLC (the “**Company**”) as a data controller² with respect to its use of personal data (the “**Personal Data**”) and cover Personal Data held electronically and as part of a manual filing system. Personal Data is information about living individuals (the “**Data Subjects**”), being information that relates to them or which identifies them directly or indirectly.

Types of Data Subjects Concerned

Private persons who are suppliers, customers, service providers, landlords, tenants, vendors or, when they are legal persons, who are their directors, officers, employees, partners, or shareholders.

Type of Data and Personal Data Collected

- Personal details including name and surname, telephone number, email, address, status within a relevant legal entity with whom we have a contractual relationship, economic and financial information (income, financial situation, tax situation, bank accounts), personal ID / passport number, political role if relevant, date of birth.
- Bank/building society details.
- Government and other official information (PPS numbers for stamp duty purposes).

The processing of such data is necessary for us to enter into a contract with you or the legal entity to which you belong and is therefore mandatory to enter into such contract.

In case you don’t provide the above Personal Data, we will not be able to perform the contractual relationship with you or the legal entity to which you belong. If you are a director, officer, employee, partners or shareholders of the legal entity contracting with us, please note that we obtained your Personal Data through the legal entity to which you belong.

Purpose	Legal basis
Administrative management of our contract with you or the company to which you belong (incl. fulfilment of contractual obligations).	Necessary for the performance of a contract to which the individual is a party (or to take pre-contractual steps) under Art. 6(1)(b) GDPR; or

¹ For France: the French Act n°78-17 of 6 January 1978 on Data Processing, Data Files and Individual Liberties (as subsequently amended); for Ireland: the Data Protection Act 2018; for Italy: the legislative Decree No. 101 of 10 August 2018; for Spain : the Data Protection and Digital Rights 2018; for Netherlands: the Dutch General Data Protection Regulation Implementation Act of 25 May 2018; for Luxembourg: the Data Protection Act of 1 August 2018; for Malta: the Data Protection Act 2018 (Cap 586); for Cyprus: the law providing for the Protection of Natural Persons with regard to the Processing of Personal Data and for the Free Movement of such Data of 2018 (Law 125(I)/2018).

² As regards the management of the contractual relationship with landlords, please note that Emerald Tower Limited (First Floor, 3013 Marketing Suit Building, Lake Drive, Citywest Business Campus, Dublin 24, D24 YXW2) acts as joint data controller. As regards the management of the contractual relationship with service providers, please note that Emerald Tower Limited and Phoenix Tower International Investment LLC (999 Yamato Road, Suite 100 Boca Raton, FL 33431, United States) act as joint data controllers.

	Necessary for the purposes of the legitimate interests pursued by the Company or a third party under Art. 6(1)(f) GDPR.
Managing our assets and property leases and performing our obligations and exercising our rights under such agreements.	Necessary for the performance of a contract to which the individual is a party (or to take pre-contractual steps) under Art. 6(1)(b) GDPR; or Necessary for the purposes of the legitimate interests pursued by the Company or a third party under Art. 6(1)(f) GDPR.
Managing our business operations and IT infrastructure, in line with our internal policies and procedures, including those relating to finance and accounting; billing and collections; IT systems operation; data and website hosting; data analytics; business continuity and optimization (such as maintaining a customer or supplier database); records management; document management; and auditing. In addition, we monitor electronic communications between us (for example, emails) to protect you, our business and IT infrastructure, and third parties including by: <ul style="list-style-type: none"> - identifying and dealing with inappropriate communications; and - looking for and removing any viruses, or other malware, and resolving any other information security issues. 	Necessary for the purposes of the legitimate interests pursued by the Company or a third party under Art. 6(1)(f) GDPR.
Maintaining records relating to business activities, budgeting, financial management and reporting, communications, managing mergers, acquisitions, sales, reorganisations or disposals of assets and integration with purchasers.	Necessary for the purposes of the legitimate interests pursued by the Company or a third party under Art. 6(1)(f) GDPR.
Managing complaints, feedback and queries, and handle requests for data access or correction, or the exercise of other rights relating to Personal Data.	Necessary for the purposes of the legitimate interests pursued by the Company or a third party under Art. 6(1)(f) GDPR.

Establish and defend legal rights to protect our business operations, and those of our business partners, and secure our rights, privacy, safety or property, and that of our business partners, you, or other individuals or third parties and to enforce our contractual or legal rights.	Necessary for the purposes of the legitimate interests pursued by the Company or a third party under Art. 6(1)(f) GDPR.
Complying with legal and regulatory obligations, record-keeping and reporting obligations, insurance requirements, payment of tax and duty, compliance with requests from government or other public authorities (including those outside your country of residence if required), responding to legal process such as subpoenas, summons or warrants, court orders.	Necessary for compliance with a legal obligation to which the Company is subject under Art. 6(1)(c) GDPR.
Conducting internal investigations to comply with legal and regulatory obligations and internal policies and procedures.	Necessary for the purposes of the legitimate interests pursued by the Company or a third party under Art. 6(1)(f) GDPR.
Promoting services and offers.	Necessary for the purposes of the legitimate interests pursued by the Company or a third party under Art. 6(1)(f) GDPR.

Disclosure of Personal Data

We may disclose Personal Data to our service providers, such as accountants, auditors, experts, lawyers and other professional advisors; IT system providers, marketing agents, support and hosting service providers; advertising, marketing and market research providers; banks and financial institutions that service our accounts; document and records management providers; and other third party vendors and outsourced service providers and group companies that assist us in carrying out business activities.

For your complete information, our service providers are subject to a strict obligation of confidentiality and in any event, will not be authorized to process your personal data for purposes other than those mentioned in the present notice.

We may also share Personal Data with: (a) government or other public authorities (including, but not limited to, courts, regulatory bodies, law enforcement agencies, tax authorities and criminal investigations agencies); and (b) third party participants in legal proceedings and their accountants, auditors, lawyers, and other advisors and representatives, as we believe to be necessary or appropriate.

Data Transfers outside the EEA

Your Personal Data may be transferred outside the EEA, notably in the United States. Appropriate safeguards in accordance with the Data Protection Laws are implemented for transferring your Personal Data outside the EEA. Indeed, the Company entered into EU Standard Contractual Clauses with its

affiliates and with its service providers. In order to obtain a copy of such Standard Contractual Clauses please send an email to privacy@phoenixintl.com.

Retention Periods

The Company will keep Personal Data for as long as necessary for the purposes for which we collect it. Where the Company holds Personal Data to comply with a legal or regulatory obligation, we will keep the information for at least as long as is required to comply with that obligation.

Where we hold Personal Data in the context of a contractual relationship, we will keep the information for at least as long as that contractual relationship, and for a number of years thereafter. The number of years varies depending on the nature of the contractual relationship (which could be up to 10 years post termination of the relationship) and will be retained for a longer period in the event of legal or prospective legal proceedings. Any Personal Data contained on documents which are required to be retained for title purposes in respect of property rights will be retained for so long as such retention is required in order to evidence title or other property interest.

Data Subject Rights

Data Protection Laws provide the following rights in favour of Data Subjects:

- a) the right to receive information on the processing (which is provided here or in any other forms or notices provided to you);
- b) the right of access to Personal Data (*i.e.* the right to access the personal data itself and other information such as the purposes of the processing or the retention period);
- c) the right to rectify inaccurate Personal Data or erase Personal Data (*i.e.* right to be forgotten);
- d) the right to restrict processing;
- e) the right to data portability (*i.e.* the right to receive your personal data in a standardized format and transmit them to another data controller);
- f) the right to object to the processing of Personal Data;
- g) the right to object to automated decision-making (including profiling) which has a legal or similarly significant effect on you;
- h) the right to complain to the relevant data protection commission³ in the event you have a complaint or believe your rights have been infringed (in such cases we would request that you bring the matter to our attention in the first instance so that we may discuss it with you); and
- i) the right to give instructions concerning the fate of his or her personal data after his or her death⁴.

Requests to exercise the rights b) to g) will be processed as soon as practicable. Please note that some of the above-mentioned rights, such as the right of data erasure, portability and objection, are restricted by Data Protection Laws and must be fulfilled by us possibly only under certain conditions.

In order to ensure the Company's files are accurate and up to date, please notify the Company as soon as possible following any change in relevant Personal Data.

³ For France: the French Data Protection Authority (CNIL); for Ireland: the Data Protection Commission; for Italy: the Italian Data Protection Authority; for Spain : the Spanish Data Protection Agency; for Netherlands: the Dutch Data Protection Authority; for Luxembourg: the National Commission for Data Protection; for Malta: the Office of the Information and Data Protection Commissioner; for Cyprus: the Office of the Commissioner for Personal Data Protection.

⁴ Please note that this right only applies when the French Act n°78-17 of 6 January 1978 on Data Processing, Data Files and Individual Liberties (as subsequently amended) is applicable to the employee.



Who to Contact about your Personal Data

To exercise the rights mentioned above, or for any question, please contact privacy@phoenixintl.com.

This Privacy Notice was last updated in August 2023.