

GCP Student Living plc – Privacy Notice

KEY SUMMARY

We rely on reputable companies to develop our business under our directions, and for this reason your personal data will normally be directly processed by parties (i) like Gravis Capital Management Limited ("Gravis"), who is our Investment Advisor, or (ii) who carry out other functions like our Administrator, Company Secretary, Registrar or Depositary and GCP Student Living plc (the "Company") will not access or anyhow process your data unless it is strictly necessary. You can see more about parties collecting and processing data about you under this scheme [here](#).

Some data collected by this website, mainly concerning website users contacting for general enquiries or in relation to another investment trust, are under Gravis (or other companies)' control and we are not responsible for the processing of such data. Please ensure you read their privacy notices if you believe they apply to you.

We process your personal information to enable us to promote and supervise the management of the Company, to maintain our accounts and records, to communicate with directors and past, current or prospective shareholders and contractors, and to deal with any enquiries or requests.

This notice explains what data we process, why, how it is legal and your rights.

ABOUT US and THIS NOTICE

This Privacy Notice is provided by GCP Student Living plc and its subsidiaries ("Company" or "we" or "us") and to the extent we process your personal data directly or by someone under our instructions, we are the data controller and responsible for processing your data. We process your data in compliance with the General Data Protection Regulation and the law applicable in other jurisdictions where appropriate.

We take your privacy very seriously. We ask that you read this Privacy Notice carefully as it contains important information about our processing and your rights.

How to contact us

- If you need to contact us about this Privacy Notice, please contact our Company Secretary by using the details below Link Company Matters Limited Beaufort House, 51 New North Road, Exeter EX4 4EP
- Telephone number: 01392 477500
- Email: gcpstudentliving@linkgroup.co.uk

If you would like this Privacy Notice in another format (for example: audio, large print, braille), please contact us.

Changes to this Privacy Notice

We may change this Privacy Notice from time to time. We will alert you **by posting a notice on our website** when changes are made.

Current version: v1 May 2018

USEFUL WORDS AND PHRASES

Please familiarise yourself with the following words and phrases (used in **bold**) as they have particular meanings in the **Data Protection Laws** and are used throughout this Privacy Notice:

Term	Definition
controller	This means any person who determines the purposes for which, and the manner in which, any personal data is processed .
criminal offence data	This means any information relating to criminal convictions and offences committed or allegedly committed.
Data Protection Laws	This means the laws which govern the handling of personal data and includes the General Data Protection Regulation (EU) 2016/679 and any other national laws implementing that Regulation or related to data protection.
data subject	The person to whom the personal data relates.
ICO	This means the UK Information Commissioner's Office who is responsible for implementing, overseeing and enforcing the Data Protection Laws in the UK.
personal data	<p>This means any information from which a <u>living individual</u> can be identified.</p> <p>This will include information such as telephone numbers, names, addresses, e-mail addresses, photographs and voice recordings. It will also include expressions of opinion and indications of intentions about data subjects (and their own expressions of opinion/intentions).</p> <p>It will also cover information which on its own does not identify someone but which would identify them if put together with other information which we have or are likely to have in the future.</p>
Processing	<p>This covers virtually anything anyone can do with personal data, including:</p> <ul style="list-style-type: none"> • obtaining, recording, retrieving, consulting or holding it; • organising, adapting or altering it; • disclosing, disseminating or otherwise making it available; and • aligning, blocking, erasing or destroying it.

Term	Definition
Processor	This means any person who processes the personal data on behalf of the controller.
special categories of data	<p>This means any information relating to:</p> <ul style="list-style-type: none"> • racial or ethnic origin; • political opinions; • religious beliefs or beliefs of a similar nature; • trade union membership; • physical or mental health or condition; • sexual life; or • genetic data or biometric data for the purpose of uniquely identifying you.

WHAT PERSONAL DATA DO WE COLLECT?

➤ **Information provided by you**

We collect your contact details such as name, email address, address, telephone number; bank account details, KYC documents and details of social media accounts

➤ **Personal information processed by third parties on our behalf**

We do not directly process most of the information you give to our Investment Adviser, Administrator, Company Secretary and other third parties like our Broker, and when they collect your personal data, or any personal data you provide to them, we or they will inform you about the processing of that data as appropriate. The type of data they process includes:

- Signatory lists for contractors
- Shareholder register analysis
- Records of meetings minutes and attendance notes
- Personal information and contact details for Directors and Advisors of the Company

➤ **Personal information about other individuals**

If you provide us with information about other individuals you confirm that you are mandated by them and thus act under their instructions and have informed them about this and any other applicable Privacy Notice as necessary.

WHY DO WE PROCESS YOUR PERSONAL DATA?

We use your **personal data** for the following purposes listed in this section. We are allowed to do so on certain legal bases (please see section 'How is processing your data lawful' for further detail):

- To enable us to promote and supervise the management of the Company
- To maintain our accounts and records
- To communicate with current former and prospective shareholders, contractors, business partners and intermediaries
- To deal with any enquiries or requests

HOW IS PROCESSING YOUR PERSONAL DATA LAWFUL?

We are allowed to **process** your **personal data** for the following reasons and on the following legal bases:

➤ **Contract**

It is necessary for our performance of the contract you have agreed to enter with us. If you do not provide your **personal data** to us, we will not be able to carry out our obligations under the terms of your contract.

➤ **Legal obligation**

We are subject to legal obligations to **process** your **personal data** for the purposes of complying with applicable regulatory, accounting and financial rules, health and safety and to make mandatory disclosures to government bodies and law enforcements.

WHO WILL HAVE ACCESS TO YOUR PERSONAL DATA?

Our Administrator, Company Secretary and Registrar will directly collect and process your personal data as our **processors only when they process personal data under our instructions**. The companies developing these services are as follows:

Who information is processed by: processors	
Company Secretary	Link Company Matters Limited
Registrar	Link Company Matters Limited
Administrator	Link Alternative Fund Administrators Limited

In addition, to the extent that it is necessary we will share your **personal data** with the following entities who act as separate **controllers** of your **personal data**. You should review their privacy notices to find out how they **process** your **personal data**. If you have any queries or complaints about how they **process** your **personal data** by them, please contact them separately using the contact information provided on their website.

Who information is shared with: controllers		Link to their privacy notice
Investment Manager	Gravis Capital Management Limited	https://www.graviscapital.com/regulatory/privacy-policy
To the extent that they do not act under our instructions (for example when they need to comply with their own legal obligations)	Administrator, Company Secretary and Registrar as listed above	https://www.linkassetservices.com/privacy-policy
Asset and Management services providers / consultants	Scape Student Living Limited, Scape Projects Limited, and Collegiate Accommodation Consulting Ltd	https://www.scape.com/en-uk/about/privacy https://www.collegiate-ac.com/privacy-policy/

We also share your personal data to the extent that this is necessary, with our brokers, auditors, tax

advisors, legal advisors and valuation agents.

We will also share your **personal data** with **the police, other law enforcements or regulators like the HMRC** where we are required by law to do so.

More information about the companies we share data with is available under request.

Transfers of your personal data outside the EEA

We may need to transfer your personal data to our subsidiaries located in Guernsey **and other countries** [which are located outside the European Economic Area, for the purposes of carrying out our businesses, to the extent that you have requested so or it is deemed necessary.

Any transfer of your data will be carried out in accordance with the law to safeguard your privacy rights and give you remedies in the unlikely event of a security breach or to any other similar approved mechanisms. If you want to know more about how data is transferred, please contact us using the details in the section above.

How we keep your personal data secure

We strive to implement appropriate technical and organisational measures in order to protect your **personal data** against accidental or unlawful destruction, accidental loss or alteration, unauthorised disclosure or access and any other unlawful forms of **processing**. We aim to ensure that the level of security and the measures adopted to protect your **personal data** are appropriate for the risks presented by the nature and use of your **personal data**. We follow recognised industry practices for protecting our IT environment and physical facilities and we ensure that the companies processing your data on our behalf provide an adequate level of protection to secure both your personal data and other confidential information.

WHEN WILL WE DELETE YOUR DATA?

Our main rule is not to keep your data for longer than we need to in order to meet all the purposes we included in the section "[Why do we process your personal data?](#)".

For example, if you are a shareholder, we will keep your data during the time you are in such position after which, we will keep your personal data if we need it to comply with a legal obligation or if we need it to meet other purposes, but if we do not need all the data you provided at first instance, we will delete the remaining data. For most of the purposes and legal obligations we have stated a retention period of 6 years.

Details of retention periods for different aspects of your personal data are available on request. Criteria which are to be considered in determining the retention periods include the following:

- the purpose(s) and use of your information by us both now and in the future (such as whether it is necessary to continue to store that information in order to continue to perform our obligations under a contract with you or to contact you in the future);
- whether we have any legal obligation to continue to process your information (such as any accounting, record-keeping or reporting obligations imposed by relevant law or regulation);
- whether we have any legal basis to continue to process your information (such as your consent);
- any relevant agreed industry practices on how long information should be retained;
- the levels of risk, cost and liability involved with us continuing to hold the information;
- how hard it is to ensure that the information can be kept up to date and accurate; and
- any relevant surrounding circumstances (such as the nature and status of our relationship with you).

YOUR RIGHTS

As a **data subject**, you have the following rights under the **Data Protection Laws**:

- the right to object to **processing** of your **personal data**;
- the right of access to **personal data** relating to you (known as data subject access request);
- the right to correct any mistakes in your information;
- the right to ask us to stop contacting you with direct marketing;
- the right to prevent your **personal data** being processed;
- the right to have your **personal data** ported to another controller;
- the right to withdraw your consent;
- the right to erasure; and
- rights in relation to automated decision making.

These rights are explained in more detail below. If you want to exercise any of your rights, please contact us (please see "How to contact us").

We will respond to any rights that you exercise within a month of receiving your request, unless the request is particularly complex, in which case we will respond within three months.

Please be aware that there are exceptions and exemptions that apply to some of the rights which we will apply in accordance with the Data Protection Laws.

➤ **Right to object to processing of your personal data**

You may object to us **processing** your **personal data** where we rely on a legitimate interest as our legal grounds for **processing**.

If you object to us **processing** your **personal data** we must demonstrate compelling grounds for continuing to do so. We believe we have demonstrated compelling grounds in the section headed "How is processing your personal data lawful".

➤ **Right to access personal data relating to you**

You may ask to see what **personal data** we hold about you and be provided with:

- a copy of the personal data;
- details of the purpose for which the personal data is being or is to be **processed**;
- details of the recipients or classes of recipients to whom the personal data is or may be disclosed, including if they are overseas and what protections are used for those overseas transfers;

- the period for which the personal data is held (or the criteria we use to determine how long it is held);
- any information available about the source of that data; and
- whether we carry out an automated decision-making, or profiling, and where we do information about the logic involved and the envisaged outcome or consequences of that decision or profiling.

To help us find the information easily, please provide us as much information as possible about the type of information you would like to see.

➤ **Right to correct any mistakes in your information**

You can require us to correct any mistakes in your information which we hold. If you would like to do this, please let us know what information is incorrect and what it should be replaced with.

➤ **Right to restrict processing of personal data**

You may request that we stop **processing** your **personal data** temporarily if:

- you do not think that your data is accurate. We will start **processing** again once we have checked whether or not it is accurate;
- the **processing** is unlawful but you do not want us to erase your data;
- we no longer need the **personal data** for our **processing**, but you need the data to establish, exercise or defend legal claims; or
- you have objected to **processing** because you believe that your interests should override our legitimate interests.

➤ **Right to data portability**

You may ask for an electronic copy of your **personal data** which we hold electronically and which we **process** when we have entered into a contract with you. You can also ask us to provide this directly to another party.

➤ **Right to withdraw consent**

You may withdraw any consent that you have given us to **process** your **personal data** at any time. This means that we will not be able to carry out any **processing** which required use of that **personal data**.

➤ **Right to erasure**

You can ask us to erase your **personal data** where:

- you do not believe that we need your data in order to **process** it for the purposes set out in this Privacy Notice;
- if you had given us consent to process your data, you withdraw that consent and we cannot otherwise legally **process** your data;
- you object to our **processing** and we do not have any legitimate interests that mean we can continue to **process** your data; or
- your data has been **processed** unlawfully or have not been erased when it should have been.

➤ **Rights in relation to automated decision making**

You have the right to have any decision that has been made by automated means and which has a significant effect on you reviewed by a member of staff and we will consider any objections you have to the decision that was reached.

What will happen if your rights are breached?

You may be entitled to compensation for damage caused by contravention of the **Data Protection Laws**.

Complaints to the regulator

It is important that you ensure you have read this Privacy Notice - and if you do not think that we have **processed** your data in accordance with this notice - you should let us know as soon as possible. You may also complain to the **ICO**. Information about how to do this is available on his website at <https://ico.org.uk/>.