

PGIM Real Estate Tenant Privacy Notice

(English)



PGIM Real Estate Tenant Privacy Notice

In connection with the property at which we are your landlord, your landlord's advisor and/or investment manager, and/or where we provide related services in connection with the property ("Services"), PGIM Real Estate¹ ("PGIM") collect, use, share, and retain personal information that identifies you as an individual or relates to an identifiable individual. PGIM may have received this information from you or other entities (i.e., entities engaged in transactions concerning you, or who, at your request, provide commercial, financial, or occupational information, etc.).

SERVICES COVERED BY THIS PRIVACY STATEMENT

This Privacy Notice describes our practices solely in connection with information that we collect from tenants at properties where we are acting as a landlord or the landlord's advisor and/or investment manager.

This Privacy Notice does not apply to other services, relationships or activities that have their own privacy statements. For example, we have separate privacy policies for California residents and certain job applicants to our European affiliates and operations. Please refer to our online [Privacy Center](#) for more information about these other notices and the types of activities they cover.

This Privacy Notice does apply to information we collect through our websites (such as PGIM.com), as well as social media pages that we control from which you are accessing this Privacy Notice, including our LinkedIn Corporation, Twitter, Inc., and YouTube, Inc. pages, (the "Social Media Pages") as part of the Services and in connection with our Relationships.

PERSONAL INFORMATION

"Personal Information" is information that identifies an individual or relates to an identifiable individual, including, but is not limited to the following:

- Name
- Postal address
- Telephone number
- Email address
- IP Address
- Date of Birth
- Passport information
- Account Details
- Social Security Number or other Tax Identification Number
- Identification Numbers
- Energy, water, and other utility usage
- Social media ID

You can find more information about the types of Personal Information we collect and use in the "How We Use Your Personal Information" section below.

• HOW WE COLLECT PERSONAL INFORMATION

We and our agents and service providers collect Personal Information in a variety of ways, including:

- Through the Services and in connection with our Relationships. For example, you may provide us with your name, address, email address, and telephone number when you visit one of our websites, register an account, attend one of our events, submit a request for information, or contact one of our

¹ For the purposes of this notice PGIM Real Estate means, as necessary, PGIM Limited, PGIM Fund Management Limited, PGIM Real Estate Germany AG, Pramerica Property Investment GmbH, PGIM Luxembourg S.A., PGIM, Inc., PGIM Real Estate France SAS, TMW USPF-Verwaltungs-GmbH, TMW ASPF Management GmbH, ASPF II Management GmbH, PLA Residential Fund III Manager, LLC; such entity that has the contractual relationship with you.

advisors or representatives.

- **Indirectly.** We may collect Personal Information from you indirectly, such as when you participate in a transaction or contractual arrangement. For example, you may provide identification data (e.g., Date of Birth, proof of residency, government issued ID, driver’s license, passport number, or other similar identifiers) as part of Leasing agreement in order to assist with fraud prevention, detection, and mitigation.
- **Automatically.** We may collect Personal Information from you automatically in connection with the Services. Please read the “Other Information” section below and refer to our Cookies and Similar Technology Statement in the Global Online Privacy Statement for more information.
- **From Other Sources.** We receive Personal Information from other sources, for example:
 - Publicly available information or databases;
 - Your employer; and /or
 - The entity to which we provide the Services and from other third parties (e.g., energy, water/ sewerage, and utility providers)

We need to collect and process Personal Information to provide the requested Services, in connection with our Relationships, or because we are otherwise legally permitted or required to do so. If you do not provide the information requested, we may not be able to provide the requested Services or meet the needs of parties to our Relationships. If you disclose any Personal Information relating to other people to us or to our service providers in connection with the Services or our Relationship, you represent that you have the authority to do so and to permit us to use the information in accordance with this Privacy Notice.

No automated decision making will occur.

HOW WE USE PERSONAL INFORMATION

We and our service providers use Personal Information for a variety of business purposes. In the chart below, we describe these different purposes, related activities, the categories of Personal Information involved and where applicable, the associated legal bases. We have also indicated where Personal Information is required to carry out the purpose and related activities.

PURPOSE	ASSOCIATED ACTIVITIES	PERSONAL INFORMATION	LEGAL BASES
Responding to Inquiries and Relationship Building	Such as: 1) responding to informational inquiries and fulfilling requests for information; 2) identifying eligibility and suitability for Services and offerings; and 3) building relationships with prospective tenants.	Name; business and personal contact information; account information (including username); Company or other internal identifier; institutional affiliations or representative capacity; professional certifications; Social Security number or tax identification number; government-issued identification; financial information, such as information about property, assets, and income; information specific to an inquiry; information and content you may choose to provide.	Legitimate interests, such as responding to inquiries and building new Relationships and tenants.
Facilitating Requests, Transactions and Account Management	Such as: 1) Setting up tenant profiles and accounts, including verifying an individual’s identity or location (or the identity or location of your representative or agent) to allow account access; 2) responding to customer service or account-related inquiries, requests or complaints; 3) conducting requested transactions and providing requested advice, including validating authorized signatories when concluding agreements and transactions; and	Name; contact information; account information (including username and password); Company or other internal identifier; institutional affiliations or representative capacity; professional certifications; financial information, such as information about property, assets, and income; Social Security number or tax identification number; government-issued identification; transaction history; account history; financial account information.	Performance of a contract, such as executing leasing agreement for tenant.

	4) contacting account holders in connection with existing or previous transactions and contractual agreements.		
Personalizing and Improving the Services	Such as: 1) understanding interests and preferences to personalize interactions and communications; and 2) analyzing data and conducting audits to develop and improve Services performance and content, such as identifying usage trends to understand which parts of our Services are of most interest.	Name; contact information; IP address (for the purpose of obtaining approximate country location; communication/content preferences (ex. Frequency, method, subject matter).	Legitimate interests, such as enhancing and improving product and service offerings.
Risk Management & Compliance	Such as: 1) conducting audits, to ensure adequate oversight over the provision of our products and services; 2) addressing legal, regulatory, or contractual requirements for fraud detection and prevention, including "know your customer", anti-money laundering, due diligence requirements, credit checks, compliance with sanction rules, tax reporting, anti-bribery, and gift-giving policies; and 3) protecting the security of accounts and Personal Information.	Name; contact information; account information (including username); Company or other online identifiers; institutional affiliations or representative capacity; professional certifications; Social Security number or tax identification number; government-issued identification; financial account information transaction history; account history.	Legitimate interests, such as ensuring security of our Services and data. Legal obligations (when stemming from EEA member State law) and legitimate interests (to comply with non-EEA member State law to which we are subject), such as collecting tax identification numbers as required by law.
Operations & General Business Purposes	Such as: 1) performing investment analysis and loan performance; 2) for data analysis, for example to identify usage trends, anticipate market and customer needs, and develop new products; 3) sending administrative information to our tenant, including changes to our terms and conditions.	Name; contact information; account username; account information or other Company or online identifiers; institutional affiliations; tax identification number; transaction history; account history.	Performance of a contract, such as providing notice of modified terms and conditions. Legitimate interests, such as enhancing and improving product and service offerings. Legal obligations relating to financial transactions, such as the obligation to maintain books and records.
Marketing & Promotions	Such as: 1) providing our tenants and prospective tenants with our newsletter and/or other marketing materials, 2) informing tenants and prospective tenants about new products or services we believe may be of interest; and 3) determining the effectiveness of promotional campaigns.	Name; contact information; account information (including username); Company or other online identifiers; institutional affiliations or representative capacity; professional certifications; transaction history; account history; communication/content preferences (ex. Frequency, method, subject matter).	Consent, such as honoring the mode of communication preferences (e.g., email, SMS). Performance of a contract, such as honoring promotional offers.

- **HOW WE DISCLOSE PERSONAL INFORMATION**

We disclose Personal Information:

- **To the appropriate PGIM organization or affiliate for the purposes described in this Privacy Notice.**
 - A listing of our affiliates and their locations can be provided by contacting your leasing agent/ management company or PGIMRealEstate.Privacy@pgim.com for a listing of our affiliates

and their locations.

- PGIM is the party responsible for the management of the shared Personal Information
- **To our third-party service providers, to facilitate services they provide to us.**
 - These can include providers of services such as managing agents, valuers and other professional advisors, research houses and/or data aggregators, insurers, acquiring/selling agents, investors, banks/lenders, administrators, prop-tech providers, lawyers, and other services (e.g., an appropriate utility management solution platform and a specialist ESG technology platform)
- **To intermediaries and counterparties with which we may have dealings.**
 - These can include financial institutions, credit institutions, investors, tax authorities, insurers, and consultants.
- **To customers' service providers or customers.**
 - For our customers, these can include your custodians, fund administrators, insurers, and consultants.
- **By using the Services, you may elect to disclose Personal Information.**
 - On other services to which you are able to post information and content (including, without limitation, our Social Media Pages). Please note that any information you post or disclose through these services will become public and may be available to other users and the general public.

OTHER USES AND DISCLOSURES OF PERSONAL INFORMATION

We also use and disclose Personal Information as necessary or appropriate, especially when we have a legal obligation or legitimate interest to do so:

- **To comply with applicable law and regulations.**
 - This can include laws outside your country of residence.
- **To cooperate with public and government authorities.**
 - To respond to a request or to provide information we believe is necessary or appropriate.
 - These can include authorities outside your country of residence.
- **To cooperate with law enforcement.**
 - For example, when we respond to law enforcement requests and orders or provide information we believe is important
- **For other legal reasons.**
 - To enforce our terms and conditions; and
 - To protect our rights, privacy, safety, or property, and/or that of our affiliates, you, or others.
- **In connection with a sale or business transaction.**
 - We have a legitimate interest in disclosing or transferring Personal Information to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings). Such third parties may include, for example, an acquiring entity and its advisors.

OTHER INFORMATION

“Other Information” is any information that does not reveal a person’s specific identity or does not directly relate to an identifiable individual. We and our service providers collect Other Information such as:

- Browser and device information;
- Application usage data;
- Information collected through cookies, pixel tags and other technologies;
- Demographic information and other information provided by you that does not reveal a person’s specific identity; and
- Information that has been aggregated in a manner that it no longer reveals a person’s specific identity.

We and our service providers may collect Other Information in a variety of ways. Please refer to the Cookies and Similar Technology Statement in the Global Online Privacy Statement here (www.pgim.com/terms-use/privacy-center) for more information.

We may use and disclose Other Information for any purpose, except where we are required to do otherwise under applicable law. If we are required to treat Other Information as Personal Information under applicable law, then we may use and disclose it for the purposes for which we use and disclose Personal Information as detailed in this Privacy Notice. In some instances, we may combine Other Information with Personal Information. If we do, we will treat the combined information as Personal Information as long as it is combined.

HOW WE PROTECT YOUR INFORMATION

PGIM seeks to use reasonable organizational, administrative, and technical, measures to protect Personal Information within our organization. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us in accordance with the “Contacting Us” section below.

CHOICES AND ACCESS

Marketing communications

PGIM gives you choices regarding our use and disclosure of your Personal Information for marketing purposes. You may opt out from receiving marketing-related emails from us. If you no longer want to receive marketing related emails from us on a going-forward basis, you may opt out by clicking on the unsubscribe link (or equivalent link) at the bottom of one of our marketing emails, by reaching out to your leasing agent/management company, or by contacting us at: PGIMRealEstate.Privacy@pgim.com.

We will try to comply with your request(s) as soon as reasonably practicable. Please note that if you opt-out of receiving marketing-related emails from us, we may still send you important administrative messages, from which you cannot opt out.

How you can access, change, or delete your Personal Information

If you would like to request to access, correct, update, suppress, restrict, or delete Personal Information, object to the processing of Personal Information, or if you would like to request to receive a copy of your Personal Information for purposes of transmitting it to another company (in each case, to the extent these rights are provided to you by applicable law), you may submit the applicable request form online (www.pgim.com/terms-use/privacy-center) or contact us by sending an e-mail to PGIMRealEstate.Privacy@pgim.com or write to use at the following address: 655 Broad Street, Newark, NJ, 07102 Mail Stop: 08-19-70. We will respond to your request consistent with applicable law.

In your request, please make clear what Personal Information you would like to have changed or suppressed from our database, as applicable. For your protection, we may only implement requests with respect to the Personal Information associated with the particular email address that you use to send us your request (or include in the webform, letter, or call details), and we may need to verify your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable.

Please note that we may need to retain certain information for recordkeeping purposes, to meet legal obligations, and/or to complete any transactions that you began prior to requesting a change or deletion.

RETENTION PERIOD

We retain Personal Information for as long as needed or permitted in light of the purpose(s) for which it was obtained and consistent with applicable law.

The criteria used to determine our retention periods include:

- The length of time we have an ongoing relationship with you and provide the Services to you;
- Whether there is a legal obligation to which we are subject (for example, certain laws require us to keep records of certain transactions for a certain period of time before we can delete them); or
- Whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation, or regulatory investigations).

THIRD-PARTY SERVICES

This Privacy Notice does not address, and we are not responsible for, the privacy, information, or other practices of any third parties, including any third party operating any website or service to which the Services link. The inclusion of a link on the Services does not imply endorsement of the linked site or service by us or by our affiliates.

CROSS-BORDER TRANSFER

Personal Information may be transferred to other countries (including countries other than where you are based that have a different data protection regime than is found in the country where you are based). In such circumstances, we will take appropriate steps to provide an adequate level of data protection within the meaning of applicable data protection law, including by implementing the EU Standard Contractual Clauses, the UK Addendum to the EU Standard Contractual Clauses, or any other appropriate safeguard based on jurisdiction where required. You can request a copy of the appropriate safeguards referenced in this section by contacting us.

A list of the affiliate companies that may jointly process your personal information is available in our securities disclosures including 10-K available here: <https://www.investor.prudential.com/financials/sec-filings/sec-filings-details/default.aspx?FilingId=15581928>, and/or upon request (please refer to the Contacting Us section of this Notice).

Additional Information for the UK and EEA

Some non-EEA or non-UK countries are recognized by the European Commission or, as applicable, the UK Government as providing an adequate level of data protection according to EEA and UK standards (the full list of these countries is available at https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en). For transfers from the EEA or the UK to countries not considered adequate by the European Commission or the UK Government, we have put in place adequate measures, such as standard contractual clauses adopted by the European Commission and/or the International Data Transfer Agreement issued by the UK Information Commissioner's Office to protect Personal Information. You may obtain a copy of these measures by contacting your leasing agent/ management company or at PGIMRealEstate.Privacy@pgim.com

SENSITIVE INFORMATION

Unless specifically requested, we ask that you not send us, and you not disclose, any sensitive Personal Information (e.g., information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal **background**, or trade union membership) on or through the Services, our Relationships, or otherwise to us.

USE OF SERVICES BY MINORS

The Services are not directed to individuals under the age of eighteen (18), and we do not knowingly collect or post Personal Information from individuals under the age of eighteen (18).

EFFECTIVE DATE

This privacy statement is effective as of the “LAST UPDATED” legend above. We reserve the right to change this statement. If we change it, we will post the current privacy notice on our website(s). Any changes to this notice will be effective as of the day they are posted. Use of the Services following these changes signifies acceptance of the revised Privacy Notice.

CONTACTING US

Please contact us at PGIMRealEstate.Privacy@pgim.com with your questions or comments or write to us at the following address: 655 Broad Street, Newark, NJ, 07102 Mail Stop: 08-19-70. We will respond to your request in accordance with applicable law.

ADDITIONAL INFORMATION REGARDING THE UK AND EEA

You may also:

- Lodge a complaint with an EU/EEA or the UK data protection authority for your country or region where you have your habitual residence or place of work or where an alleged infringement of applicable data protection law occurs. A list of data protection authorities in the EU/EEA is available at https://edpb.europa.eu/about-edpb/about-edpb/members_en and information regarding lodging a complaint with the UK ICO can be found here: <https://ico.org.uk/make-a-complaint/>
- The contact information for our data protection officer (DPO) in Germany is as follows:

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