

PRIVACY POLICY

1.- Scope of application

CASTELLANA PROPERTIES SOCIMI S.A. (hereinafter, “CASTELLANA”) is committed to protecting the privacy of its clients and users who access the website indicated below, available at the following address: <https://www.castellanaproperties.es> (hereinafter, the “Website”), including the specific section dedicated to CAMINHO PROPÍCIO – SIC IMOBILIÁRIA FECHADA, S.A. (hereinafter, “CAMINHO”), accessible at <https://www.castellanaproperties.es/es/caminho-propicio> (hereinafter, the “CAMINHO Section”).

The contents of the Website are owned by, or are operated, licensed or controlled by CASTELLANA. Use of this Website confers the status of user (hereinafter, the “user”).

Where the user submits a query or request linked to CAMINHO, their personal data may be processed by CAMINHO in order to manage such request and, where applicable, any pre-contractual or contractual relationship that may arise.

The user may browse and use the Website without providing any personal data. The only personal data to which CASTELLANA will have access are those voluntarily provided by the user through the forms made available for this purpose, or when the user contacts CASTELLANA by email or through any other means provided on the Website. Within the CAMINHO Section, there is currently no specific form, and contact is primarily carried out through the email address datos@castellanaproperties.es. Where personal data are collected through cookies, users will be duly informed through the [Cookie Policy](#), as well as through the channels required by applicable legislation.

This document sets out our policy regarding the observance and use of personal data collected through our Website or auxiliary devices such as mobile phones or tablets. Likewise, use of the Website implies acceptance by the user of the provisions contained in this Privacy Policy and that their personal data will be processed as stipulated herein.

Please note that although there may be links on our Website to other websites, this Privacy Policy applies solely to the Website and not to the websites of other companies or organisations to which the Website may redirect users. CASTELLANA and CAMINHO

neither control nor approve the content of third-party websites and accept no responsibility whatsoever for the content or privacy policies of such websites.

2.- Personal data protection

In accordance with the foregoing, and in compliance with the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation – GDPR), as well as “Ley Orgánica 3/2018, de 5 de diciembre, de Protección de Datos Personales y garantía de los derechos digitales (LOPDGDD)” and “Lei n.º 58/2019, de 8 de agosto”, which ensures the implementation of the GDPR within the Portuguese legal system, we hereby inform you that, depending on the purpose of the processing, CASTELLANA and/or CAMINHO may act as data controllers, applying the necessary measures to ensure that personal data are processed lawfully, fairly, transparently, adequately, relevantly, limitedly, accurately and kept up to date, in accordance with the purposes and legal bases established under applicable legislation.

A. Data Controllers:

A.1. Data controller for the technical operation of the Website (including the installation and management of cookies), as well as for handling requests submitted through the general contact forms on the Website:

- **Corporate name:** CASTELLANA PROPERTIES SOCIMI S.A.
- **Tax Identification Number (C.I.F.):** A-87293015
- **Address:** Pº de la Castellana 36-38, 8th Floor
- **Registration:** Madrid Companies Register (Registro Mercantil de Madrid), Volume 33483, Folio 64, Section 8, Company file number 602735, Registration entry 4.
- **Telephone:** (+34) 91 426 86 86
- **E-mail:** datos@castellanaproperties.es

A.2. Data controller for the management of requests, communications and, where applicable, pre-contractual or contractual relationships linked to CAMINHO (for example, where the user contacts us in relation to the CAMINHO Section):

- **Corporate name:** CAMINHO PROPÍCIO – SIC IMOBILIÁRIA FECHADA, S.A.
- **Tax Identification Number (NIPC):** 518372766
- **Address:** Rua Joaquim António Aguiar, 66, 6º, 1050-121 Lisbon (Portugal)
- **Registration:** Lisbon Commercial Registry Office under corporate entity number 518372766
- **Telephone:** (+34) 91 426 86 86
- **E-mail:** datos@castellanaproperties.es

For operational purposes, both entities have designated the email address datos@castellanaproperties.es and the telephone number (+34) 91 426 86 86 as a single point of contact. The data subject may indicate in the subject line whether their request refers to “Caminho” in order to facilitate proper handling. Where appropriate, CASTELLANA will forward requests related to CAMINHO to CAMINHO for proper attention.

In particular, where the user submits queries, requests or communications relating to CAMINHO through the single point of contact or other channels enabled on the Website, CASTELLANA provides CAMINHO with hosting, support and communication routing services within the framework of the CAMINHO Section. In such cases, CASTELLANA processes personal data on behalf of CAMINHO, acting as a data processor in accordance with Article 28 of the GDPR, and without using such data for its own purposes unrelated to the provision of the service.

Likewise, REFUNDOS – Sociedade Gestora de Organismos de Investimento Coletivo, S.A. (NIPC: 502913290) may process personal data, where applicable, within the framework of the management and administration of CAMINHO on behalf of and for CAMINHO, in accordance with the applicable regulatory framework.

B. Purpose and legal bases for processing:

Controller	Purpose	Legal basis
<p style="text-align: center;">CASTELLANA & CAMINHO</p>	<p>Handling and managing requests or queries submitted via email or Website contact forms (including, where applicable, queries linked to the CAMINHO Section)</p>	<ol style="list-style-type: none"> 1. Consent of the data subject (Article 6(1)(a) GDPR) when submitting the form. 2. Performance of pre-contractual measures or a contract (Article 6(1)(b) GDPR), where the request relates to a relationship with CAMINHO. 3. Legal obligation (Article 6(1)(c) GDPR) in the case of requests related to the exercise of rights.
<p style="text-align: center;">CASTELLANA</p>	<p>Preparation of usage statistics and analysis in order to improve the quality and functionality of the Website.</p>	<p>Consent of the data subject (Article 6(1)(a) GDPR) granted through the cookie banner.</p>

Users under 18 years of age may only browse the Website under the supervision of a parent or legal guardian. No data relating to minors are processed through the Website, and users must refrain from providing such data if they do not meet the required age.

For these purposes, the user provides the following data through the contact form: first name, last name and email address.

Furthermore, we do not make automated decisions based on profiling, except for the personalisation of advertising and the prevention of online fraud.

Personal data will be retained for as long as necessary to fulfil the purpose for which they were collected and subsequently for the periods required by applicable law.

C. Disclosure of personal data:

Information relating to our clients is very important to us; therefore, we will only disclose data for specific purposes and will always inform you accordingly. Users' data may be disclosed to:

- Banks, savings banks, public authorities and entities necessary to fulfil the provision of the service and billing obligations.
- Companies forming part of the CASTELLANA PROPERTIES Group, for the purpose of properly managing contractual or pre-contractual relationships, as a result of the centralisation of administrative and IT processes within the Group, as well as for commercial purposes where you have given your consent.
- Data processors necessary for the provision of the service, with whom we have entered into service agreements that include confidentiality obligations and security measures.
- CAMINHO and, where applicable, REFUNDOS – Sociedade Gestora de Organismos de Investimento Coletivo, S.A. (NIPC: 502913290; registered office: Rua Joaquim António Aguiar, 66, 6º, 1070-153 Lisbon, Portugal), where the query or request refers to CAMINHO and is necessary for its management and administration in accordance with the applicable Portuguese regulatory framework.

D. User rights:

At any time, the user may exercise their rights of access, rectification, restriction of processing, erasure, objection, data portability, and the right not to be subject to automated individual decision-making, by submitting a written and signed request to CASTELLANA PROPERTIES SOCIMI S.A. at the address indicated above or via email at datos@castellanaproperties.es. In the case of processing operations for which CAMINHO is the data controller, the data subject may also exercise their rights through the same single point of contact, indicating that the request refers to CAMINHO.

The exercise of these rights is free of charge, unless the requests are unfounded or excessive, in which case the user shall bear the administrative costs incurred.

Where the data subject considers that their rights have not been adequately addressed, they may lodge a complaint with the competent supervisory authority. In particular, they may contact the Agencia Española de Protección de Datos ([AEPD](#)) and/or the Comissão Nacional de Proteção de Dados ([CNPD](#)) in Portugal, without prejudice to other competent authorities in accordance with the GDPR.

E. Data collection through devices such as mobile phones or tablets:

When you use CASTELLANA's Website and request or consent to location-based services, where applicable, we may receive information regarding your location and your mobile phone or tablet device, including a unique identifier. We may use such information to provide location-based services, such as search results and other personalised content. Most mobile devices allow you to disable such location services.

F. Security measures:

CASTELLANA informs users that it has adopted the technical and organisational measures necessary to maintain the level of security required in view of the personal data processed and has also implemented the necessary mechanisms to prevent, as far as possible, unauthorised access, misappropriation, unlawful modification and loss of data.

We have physical, electronic and procedural security systems relating to the collection, storage and disclosure of users' personal information. Our security procedures may require us, on occasion, to request proof of identity before providing confidential information.

3.- International data transfers

CASTELLANA's and CAMINHO's services may be provided using resources and servers located in different countries (such as Spain, Portugal and South Africa). As a result, your information may be processed outside the country in which the service you are using is located, including in countries outside the European Economic Area (EEA) where the level

of data protection does not meet the requirements established by the European Commission (such as the United States).

When transferring information, we comply with all applicable laws to ensure adequate protection of your privacy. In general, when transferring personal data outside the EEA, we apply the mechanisms recognised under the GDPR to ensure an adequate level of protection. In the case of transfers to the United States, such transfers are carried out in accordance with the European Commission's adequacy decision regarding the EU-U.S. Data Privacy Framework, adopted on 10 July 2023, or through Standard Contractual Clauses approved by the European Commission, where applicable. You may contact us using the contact details provided above.

Your information may be transferred or access thereto may be granted to CASTELLANA's subcontractors that carry out tasks related to the Website. CASTELLANA's subcontractors are not authorised to use personal data for any other purpose, and their services are always subject to a confidentiality clause.

CASTELLANA and CAMINHO never disclose your personal data without your specific permission, unless required to fulfil your request or administer our interactive customer programmes. However, information may be disclosed where required by law, court order, or regulations or requests issued by competent authorities.

For statistical purposes, CASTELLANA may provide trusted third parties with anonymous statistical data collected regarding its customers, sales, traffic types, financial year information and similar Website information. Such statistics do not contain personal data that could identify you.

4.- Confidentiality

In compliance with applicable regulations, CASTELLANA and CAMINHO undertake to comply with their obligation of secrecy regarding the personal data provided by users during browsing of this Website and to keep such data confidential.

5.- Use of third-party cookies

Without prejudice to the [Cookie Policy](#), this Website uses Google Analytics, a web analytics service provided by Google LLC, a Delaware company with its principal office at 1600 Amphitheatre Parkway, Mountain View (California), CA 94043, United States (“Google”). Google Analytics uses “cookies”, which are text files placed on your computer, to help the Website analyse how users use the Website. The information generated by the cookie about your use of the Website (including your IP address) will be transmitted to and stored by Google on servers in the United States.

Google will use this information on our behalf for the purpose of tracking your use of the Website, compiling Website activity reports and providing other services relating to Website activity and internet usage. Google may transfer this information to third parties where required by law, or where such third parties process the information on Google’s behalf. Google will not associate your IP address with any other data held by Google.

You may refuse the processing of data or information by rejecting the use of cookies through appropriate browser settings; however, please note that if you do so, you may not be able to use the full functionality of this Website. By using this Website, you consent to the processing of information about you by Google in the manner and for the purposes set out above.

6.- Automatic information

Examples of the information we collect and analyse include: the Internet Protocol (IP) address used to connect your computer to the Internet; information about your computer and Internet connection, including browser type and version; time zone settings; browser plug-in types and versions; operating system and platform; the “history of visits” of web page URLs from, through and to our Website (including date and time); number of cookies; and any telephone number used to contact our customer service.

We may also use browser data such as cookies, Flash cookies (also known as Local Shared Objects), or similar data in certain areas of our Website for purposes including fraud prevention. During visits to the Website, we may use software tools to measure and collect session information, including page response times, download errors, length of visits to certain pages, page interaction information (such as mouse clicks, scrolling or mouse-over

activity), and methods used to leave the Website. We may also collect technical information that helps us identify your device for diagnostic analysis and fraud prevention purposes.

7.- Notices and revisions

If you have any questions regarding CASTELLANA's privacy practices, please send us an email at datos@castellanaproperties.es detailing your query, and we will endeavour to resolve it. Where your query refers to CAMINHO, you may use the same contact point indicating such circumstance.

CASTELLANA may modify and update this Privacy Policy at any time without prior notice. With regard to the Caminho Propício Section, CAMINHO may introduce the relevant updates. Please ensure that you remain informed of our Privacy Policy, Cookie Policy and Legal Notice, including Terms and Conditions of Use, in order to be aware at all times of the data collected through the Website, how we use it, and the circumstances under which it may be disclosed to third parties.

The user shall be automatically bound by the conditions in force at the time they access the Website and must therefore periodically review this document.