

## Privacy Notice for Cohen & Steers

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This Privacy Notice for Cohen & Steers UK Limited, together with its affiliates as appropriate, (“**Company**”, “**we**”, “**us**”, “**our**”) sets out the categories of personal data we collect from you, how we collect it, what we use it for and with whom we share it in accordance with the General Data Protection Regulation (EU) 2016/679 (“**GDPR**”).

As a data controller, the Company, located at 50 Pall Mall, 7<sup>th</sup> Floor, London, SW1Y 5JH, United Kingdom, is responsible for deciding how we hold and use personal data about you. Should you have any questions about this Privacy Notice you can contact us at [webprivacy@cohenandsteers.com](mailto:webprivacy@cohenandsteers.com).

This Privacy Notice applies to personal data about you that we collect, use and otherwise process in connection with your relationship with the Company. We reserve the right to update this privacy notice at any time, and we will make an updated copy of such privacy notice available on our website. We may also notify you in other ways from time to time about the processing of your personal data.

### **What is personal data?**

By “personal data” we mean any information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Personal data does not include data where you can no longer be identified from it such as anonymised or aggregate data.

### **How do we collect your personal data?**

We may collect personal data about you:

- When you communicate or transact with us in person, writing, electronically, or by phone.
- When you submit applications or requests for forms.
- When you request literature from us.
- When you visit our website.
- From third parties providing services to us.
- From public sources.

We may also automatically collect certain data when you interact with our website such as technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. For further information about our use of these technologies, and how to control them, please see our [cookie policy](#).

## **What personal data do we collect about you and what do we use it for?**

We may collect personal data from you such as a name, contact details, your employer, and online identifiers such as your IP address. These types of personal data are processed under a 'lawful basis' specified under GDPR as described below.

We use your personal data to fulfill a contract we have entered into with you, to comply with a legal obligation, to protect vital interest, or as may be required for the public good. This includes:

- To contact you regarding fulfilling the contract we have with you or your firm.
- To monitor and record calls and electronic communications for processing and verification of instructions; investigation and fraud prevention purposes; and crime detection, prevention, investigation and prosecution.
- To provide services requested by you as described when we collect the data.
- To enforce this privacy notice, or to comply with legal obligations that we are subject to.

We use your personal data to pursue our legitimate interests (or those of a third party) where your rights and freedoms do not outweigh these interests. This includes to:

- Deliver targeted marketing and services.
- Improve and customize website content based on your preferences.
- Measure how our clients use our products/services, in order for us to develop them, grow our business and inform our marketing strategy.
- Define types of clients for our products/services and to keep our website updated and relevant.
- Communicate or transact with you related to services and business we undertake.

Generally we do not rely on your consent as a lawful basis for processing your personal data other than in relation to sending direct marketing communications to you via email. You have the right to withdraw consent to marketing at any time by contacting us on the details given at the beginning of this notice.

We may process your personal data without your knowledge or consent, in compliance with the above rules, if we are required by law to do so or if we reasonably believe that it is necessary to protect our rights and/or to comply with judicial or regulatory proceedings, a court order or other legal process.

We will only use your personal data for the purposes for which we collected it as identified above, unless we reasonably consider that we need to use it for another reason which is compatible with the original purpose for which you provided it to us.

## **What if you do not provide the personal data we request?**

If you do not provide us with certain personal data when requested, we will not be able to perform all or part of the contract we have entered into with you, or we may be prevented from complying with our legal obligations.

## **With whom will we share your personal data?**

We will need to share your personal data with:

- Other entities in our group to service your accounts or if they act as a service provider, as well as for system maintenance support and for hosting of data.
- Our service providers, including auditors, lawyers, IT service providers.
- Others in the context of the possible sale, restructuring, or acquisition of the business.
- A regulator or to otherwise comply with applicable law or judicial process.

We may share your personal data with third parties where this is required by law, where it is necessary to perform our contract with you, or where we have another legitimate interest in doing so. We may disclose your personal data if we are required by law to do so or if we reasonably believe that disclosure is necessary to protect our rights and/or to comply with judicial or regulatory proceedings, a court order or other legal process.

## **Processing of your personal data outside the EU**

The personal data we collect about you may be transferred outside of the EU including to affiliates of the Company. If such a transfer occurs, we are required to ensure that the processing of your personal data is done so with physical, electronic and procedural safeguards in place that are reasonably designed to protect your personal data from unauthorized access and use in order to ensure that your personal data is treated in a manner that is consistent with and which respects the EU laws on data protection. If you require further information about the transfer of your personal data outside the EU, you can request it from [webprivacy@cohenandsteers.com](mailto:webprivacy@cohenandsteers.com).

## **How long will we retain your personal data?**

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, accounting or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. Details of retention periods for different aspects of your personal data are documented in our retention policy.

Once we no longer require your personal data for the purposes we collected it for, we will securely destroy your personal data in accordance with applicable laws and regulations.

## **Accuracy of personal data**

It is important that the personal data we hold about you is accurate and current. Please let us know if your personal data changes during your relationship with us.

## Your rights in relation to your personal data

You have rights as an individual which you can exercise in relation to the information we hold about you under certain circumstances. These rights are to:

- Request **access** to your personal data (commonly known as a “data subject access request”) and request certain information in relation to its processing.
- Request **rectification** of your personal data.
- Request the **erasure** of your personal data.
- Request the **restriction** of processing of your personal data.
- **Object** to the processing of your personal data.
- Request the **transfer** of your personal data to another party.

If you want to exercise one of these rights please contact us at [webprivacy@cohenandsteers.com](mailto:webprivacy@cohenandsteers.com). In certain circumstances it may not be feasible for the Company to discharge these rights.

You also have the right to make a complaint at any time to the Information Commissioner’s Office. We would, however, appreciate the opportunity to deal with your concerns prior to any approach to the supervisory authority so please do contact us in the first instance.

You will not usually have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is manifestly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

## What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information or to exercise any of your other rights. This is another appropriate security measure to ensure that personal data is not disclosed to any person who has no right to receive it. While we strive to protect all information we receive from you, we cannot guarantee the security of any information you transmit to us.

## Your right to withdraw your consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact [webprivacy@cohenandsteers.com](mailto:webprivacy@cohenandsteers.com). Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose(s) you originally agreed to unless we now have an alternative legal basis for doing so.

## Further information

This Privacy Notice was written with brevity and clarity in mind and is not an exhaustive account of all aspects of our collection and use of personal data. If you require any further information, please do not hesitate to contact [webprivacy@cohenandsteers.com](mailto:webprivacy@cohenandsteers.com).