



Addendum 1.1 – Individual Rights

What are your rights, and how can you exercise them?

How do I send my request?

A request can be submitted to IFM by sending an email to dataprotection@ifminvestors.com.

When will I receive a response from IFM?

- If you exercise any of your rights under data protection law, IFM will respond as soon as reasonably practicable. This must be no later than one calendar month, starting from the day IFM receives the request. If IFM requires additional information in order to review your request (*e.g., a document to verify your identity*), the time limit will commence once all of the required information and/or supporting documentation has been received.
- If your request is complex or you make multiple requests, the response time may be a maximum of three calendar months, starting from the day we receive your initial request.

A. Right to access - You have the right to confirm with us whether your Personal Data is processed, and if it is, to request access to that Personal Data, including the categories of Personal Data processed, the purpose of the Processing and the recipients or categories of recipients. We can only provide you with your Personal Data, not Personal Data about another Individual, unless written permission is received. Additionally, where access would adversely affect another Individual's rights, we are not required to provide Personal Data. In certain scenarios, due to legal privilege, we may not be able to share some or all of the records requested.

What is required to be included in my request?

The following information should be included in the request:

- A subject line or header noting "Personal Data Access Request";
- Sufficient Personal Data for us to identify you. This may include your full name (and any other names where relevant), email address, home address and phone number, c, or any other Personal Data that can help identify you;
- Details of the Personal Data you are seeking;
- The reason (including any supporting information) on why you are wanting to access the Personal Data; and
- How would you like to receive the Personal Data (*e.g. electronically, or printed and sent by post*), and if you have any accessibility requirements (*e.g. large fonts*).

Can I make an access request for someone else?

You can make an access request on someone else's behalf if you can prove that you have the Individual's permission to obtain the Personal Data from us.

When you submit a request on someone else's behalf, please provide the following evidence along with the formal access request:

- Written permission from the person; or
- A power of attorney document (where applicable).



What actions will IFM undertake

IFM will take reasonable steps to investigate whether the access request related to Personal Data is valid. IFM will:

- Acknowledge that the request is received and provide the estimated timeframe for a response to be provided; and
- Investigate the access request and where the request can be fulfilled provide you with copies of the information, which may include the purpose for which your Personal Data is being used, third parties with whom your Personal Data is being proposed to be shared, the retention period, and an overview of the security measures.

Alternatively, IFM may decline the access request and provide an explanation for the outcome.

In what other circumstances can IFM decline a request?

IFM may be unable to fulfil an access request in certain circumstances, for example if it involves a disproportionate effort to provide the information or where an exemption applies under applicable law. In certain cases, IFM may either charge a reasonable fee to process the request or decline to address it altogether. IFM will inform you of its decision and justification.

- B. Right to rectification** - You have the right to rectify any inaccurate or incomplete Personal Data about you. We recommend checking your Personal Data regularly to keep it accurate and up to date.

What is required to be included in my request?

The following information should be included in the request:

- A subject line or header noting "Personal Data Rectification Request";
- Sufficient Personal Data for us to identify you. This may include your full name (and any other names where relevant), email address, home address and phone number, or any other Personal Data that can help identify you;
- Detailed information on what you believe is inaccurate or incomplete; and
- Where available, provide evidence or supporting information of the inaccuracies.

What actions will IFM undertake

IFM will take reasonable steps to investigate whether the Personal Data held is accurate and should be able to demonstrate that it has done so. IFM will:

- Acknowledge that the request is received and provide the estimated timeframe for a response to be provided; and
- Confirm it has corrected the Personal Data, if applicable.

Alternatively, where IFM is unable to correct your Personal Data, an explanation will be provided on the outcome.

In what other circumstances can IFM decline a request?

IFM may be unable to fulfil a request for rectification in certain circumstances, for example, if it involves a disproportionate effort to provide the information or where an exemption applies under applicable law. In certain cases, IFM may either charge a reasonable fee to process the request or decline to address it altogether. IFM will inform you of its decision and justification.



- C. Right to erasure** - You may have the right to request the erasure of your Personal Data under applicable local regulations. However, this right does not apply if your Personal Data is processed for specific purposes, such as the exercise or defense of legal claims.

What is required to be included in my request?

The following information should be included in the request:

- A subject line or header noting "Personal Data Erasure Request";
- Sufficient Personal Data for us to identify you. This may include your full name (and any other names where relevant), email address, home address and phone number or any other Personal Data that can help identify you; and
- Details of the Personal Data you want to erase.

What actions will IFM undertake

IFM will delete your Personal Data in accordance with your request, unless an exemption in data protection law applies (refer to the section "*In what other circumstances can IFM decline a request?*" below). IFM will:

- Acknowledge that the request is received and provide the estimated timeframe for a response to be provided; and
- Confirm that IFM has deleted the Personal Data, if applicable.

Alternatively, where IFM is unable to delete your Personal Data an explanation will be provided on why IFM will continue to hold the Personal Data to carry out its legal obligations or internal administrative tasks.

In what other circumstances can IFM decline a request?

IFM may decline a request for erasure in the following circumstances:

- When keeping your Personal Data is necessary for reasons of freedom of expression and information;
- When IFM is legally obliged to keep hold of your Personal Data, such as complying with financial or other regulations;
- When IFM is subject to a legal obligation under applicable law or regulation that requires processing the Personal Data; performing a task carried out in the public interest; or in the exercise of official authority;
- When keeping your Personal Data is necessary for establishing, exercising, or defending legal claims; and
- When erasing your Personal Data would prejudice research or archiving that is in the public interest.

In addition, the right to erasure does not apply to special category data when keeping hold of your Personal Data is necessary for reasons of public health in the public interest.

If an exemption applies, IFM can either fully or partly refuse to comply with your request.

IFM may be unable to fulfil a request for erasure in certain circumstances, for example, if it involves a disproportionate effort to provide the information or where an exemption applies under applicable law. In certain cases, IFM may either charge a reasonable fee to process the request or decline to address it altogether. IFM will inform you of its decision and justification.

- D. Right to data portability** - You may have the right to obtain the Personal Data that you provided to us in a structured, commonly used, and machine-readable format, and you may also have the right to transfer that Personal Data to another entity under applicable local regulations.



What is required to be included in my request?

The following information should be included in the request:

- A subject line or header noting "Personal Data Portability Request";
- Sufficient Personal Data for us to identify you. This may include your full name (and any other names where relevant), email address, home address and phone number, or any other Personal Data that can help identify you; and
- Details of the Personal Data you want to transfer.

What actions will IFM undertake

IFM will take reasonable steps to investigate whether the Personal Data can be transferred in accordance with your request unless an exemption in data protection law applies. IFM will:

- Acknowledge that the request is received and provide the estimated timeframe for a response to be provided;
- Provide the requested Personal Data in a commonly used, machine-readable format (e.g., a CSV file), and may also offer access through an automated tool, if available;
- Depending on your request, send the Personal Data to an organisation you specify; and
- Confirm that Personal Data has been sent to an organisation you specify.

Alternatively, where IFM is unable to transfer your Personal Data an explanation of the outcome will be provided.

Please note that your Personal Data will not be deleted after it is shared with you. If you wish to delete your Personal Data, you may need to exercise your right to erasure.

In what other circumstances can IFM decline a request?

IFM may be unable to fulfil a portability request in certain circumstances, for example, if it involves a disproportionate effort to provide the information or where an exemption applies under the law. In certain cases, IFM may either charge a reasonable fee to process the request or decline to address it altogether. IFM will inform you of its decision and justification.

- E. Right to restriction of processing** - In certain situations, you have the right to ask us to restrict the processing of your Personal Data. When processing is restricted, we can still store your Personal Data, but we may not use it further. However, please note that by restricting your Personal Data it may affect our ability to provide you with services.

What is required to be included in my request?

The following information should be included in the request:

- A subject line or header noting "Personal Data Restriction of Processing Request";
- Sufficient Personal Data for us to identify you. This may include your full name (and any other names where relevant), email address, home address and phone number, or any other Personal Data that can help identify you; and
- What Personal Data do you want to be restricted and a detailed explanation on why you would like the restriction to be applied.

What actions will IFM undertake

IFM will take reasonable steps to investigate whether the Personal Data can be restricted for processing in accordance with your request unless an exemption in data protection law applies. IFM will:



- Acknowledge that the request is received and provide the estimated timeframe for a response to be provided;
- If applicable, temporarily move your data to another system or make it unavailable to users;
- If applicable, temporarily remove it from a website if it has been published;
- If the data is shared with others, IFM will contact each recipient and inform them of the restriction; and
- Confirm that IFM has restricted processing of your Personal Data for the specified purpose.

Alternatively, where IFM is unable to restrict the processing of your Personal Data, an explanation will be provided outlining why IFM will continue to process your Personal Data to carry out its legal obligations or internal administrative tasks.

In what other circumstances can IFM decline a request?

IFM may be unable to fulfil a restriction of processing request in certain circumstances, for example if it involves a disproportionate effort to provide the information or where an exemption applies under applicable law. In certain cases, IFM may either charge a reasonable fee to process the request or decline to address it altogether. IFM will inform you of its decision and justification.

F. Right to object - In certain situations, you may have the right to object to processing your Personal Data, based on your specific circumstances. This means we may be required to stop processing your Personal Data.

What is required to be included in my request?

The following information should be included in the request:

- A subject line or header noting "Personal Data Request - Object to Processing";
- Sufficient Personal Data for us to identify you. This may include your full name (and any other names where relevant), email address, home address and phone number, or any other Personal Data that can help identify you; and
- Advise that you would not like IFM to process your Personal Data and provide a detailed explanation for requesting to object to the processing of your Personal Data.

What actions will IFM undertake

IFM will take reasonable steps to investigate whether the Personal Data request can be objected for processing unless an exemption in data protection law applies. IFM will:

- Acknowledge that the request is received and provide the estimated timeframe for a response to be provided;
- If your objection is successful, IFM will stop or not process your Personal Data for the purpose you have mentioned in the request; and
- Confirm IFM has stopped processing your Personal Data.

Alternatively, if your objection is unsuccessful, IFM may still be able to legitimately continue using your Personal Data for other purposes.

In what other circumstances can IFM decline a request?

IFM may be unable to fulfil an objection to processing request in certain circumstances, for example if it involves a disproportionate effort to provide the information or where an exemption applies under applicable law. In certain cases, IFM may either charge a reasonable fee to process the request or decline to address it altogether. IFM will inform you of its decision and justification.



G. Rights relating to Automated Decision-Making - In certain situations, you may have the right to object to the processing of your Personal Data, including Profiling¹, based on your specific circumstances. This means we may be required to stop processing your Personal Data.

What is required to be included in my request?

The following information should be included in the request:

- A subject line or header noting "Personal Data Request - Object to Automated Decision-Making";
- Sufficient Personal Data for us to identify you. This may include your full name (and any other names where relevant), email address, home address and phone number, or any other Personal Data that can help identify you; and
- State that you do not want IFM to process your Personal Data using automated decision-making and clarify the reason/s for requesting to object to the processing of your Personal Data for automated decision-making-related processing activity.

What actions will IFM undertake

IFM will take reasonable steps to investigate whether the Personal Data request can be objected for automated decision-making processing unless an exemption in data protection law applies. IFM will:

- Acknowledge that the request is received and provide the estimated timeframe for a response to be provided;
- If your objection is successful, IFM will stop or not process your Personal Data for automated decision-making-related processing activity; or
- Confirm that IFM has stopped processing your Personal Data for automated decision-making-related processing activity.

Alternatively, if your objection is unsuccessful, IFM may still be able to legitimately continue using your Personal Data for the purpose.

In what other circumstances can IFM decline a request?

IFM may be unable to fulfil an objection to automated decision-making request in certain circumstances, for example if it involves a disproportionate effort to provide the information or where an exemption applies under applicable law. In certain cases, IFM may either charge a reasonable fee to process the request or decline to address it altogether. IFM will inform you of its decision and justification.

¹ 'Profiling' means any form of automated processing of Personal Data consisting of the use of Personal Data to evaluate certain personal aspects relating to the Individual, in particular to analyse or predict aspects concerning that Individual's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.