

EXTERNAL PRIVACY NOTICE

1. BACKGROUND

- 1.1 SEGRO plc ("we" or "the Company") is a data controller for the purposes of applicable data protection laws, including the European Data Protection Regulation ("EU GDPR"), UK General Data Protection Regulation, (the "UK GDPR") and the Data Protection Act 2018 (the "DPA" and together the "**Data Protection Legislation**"). This means we make decisions about how and why we process your personal data and because of this, we are responsible for the personal information we hold about you.
- 1.2 In accordance with the Data Protection Legislation, personal data must be processed in a lawful, fair, and transparent manner in relation to the data subject (i.e. you). Accordingly, an important part of the protection of your privacy is to inform you about the processing of your personal data. This privacy notice sets out what information we collect about you, how we will use it and for what purpose. This notice overrides anything different previously communicated to you.
- 1.3 As we undertake a wide range of activities, we've organised information into tables, reflecting the different ways you might interact with us, in order to help you get to the information you want quickly. This notice will apply to you if you:
 - 1.3.1 are one of our service partners, suppliers or customers;
 - 1.3.2 visitor to one of our buildings or offices;
 - 1.3.3 party (or potential party) to a property transaction with us such as customers and joint venture partners;
 - 1.3.4 are a current shareholder or former shareholder;
 - 1.3.5 are engaged with us for marketing / advertising;
 - 1.3.6 participate in one of our community investment programmes or Responsible SEGRO initiatives;
 - 1.3.7 all data subjects.
- 1.4 Please note more than one section may apply to you. For example, a service partner may need to read the service partner section and the visitor section.
- 1.5 Please take the time to read and understand this privacy notice. If you have any queries, you may contact us using the details at the end of this notice.

2. SCOPE, PURPOSES AND LAWFUL BASIS OF PERSONAL DATA PROCESSED

- 2.1 Set out in the table below is a list of the ways that we may use your personal data, the reasons for doing so and lawful basis we rely on to do so. This is also where we tell you what our (or a third parties') legitimate interests are.

Relating to	Description of personal data	Why we use your personal data	Lawful basis
Our service partners, suppliers or customers including contractors and any representatives of such.	<ul style="list-style-type: none"> Contact details including first and last name, Company name Bank Email address Registration details account details Occupation Any other information individuals share 	<ul style="list-style-type: none"> to facilitate communication; to manage our service partners, suppliers and customers in respect of our projects; for the maintenance of our buildings; for the supply of other goods and services that our business may need; and to perform our obligations including with respect to payments. 	<p>Contract</p> <p>Legal obligation including with respect to:</p> <ul style="list-style-type: none"> the Modern Slavery Act 2015; and health and safety. <p>Our Legitimate Interest: in engaging and managing third parties.</p>
Our service partners, suppliers or customer including contractors and any representatives of such - in connection with our customer Intelligence Platform: Introhive.	<ul style="list-style-type: none"> Contact details on emails such as: name, telephone number, email address; business address; job title; LinkedIn information and any company specific social media links; Your connection/ relationship with SEGRO employees 	<ul style="list-style-type: none"> to create efficiencies in the way we send and receive communications with prospective or actual customers and other external third parties; and to connect interests, relationships, engagements, links, affiliations (direct or indirect). 	<p>Our Legitimate Interests:</p> <ul style="list-style-type: none"> to develop our customer relationship management; to develop our relationships and grow our business; to ensure that valuable business relationships and potential opportunities are not lost; to enhance and enrich our CRM system; to efficiently manage communications.
Visitor to one of our buildings or offices	<ul style="list-style-type: none"> Contact details including first and last name Company and professional information such as occupation, title and role Email address Photographs 	<ul style="list-style-type: none"> to verify identity; to provide access to buildings; to effectively manage and operate our buildings; for crime prevention, security and public safety; for crisis management including fire or other incident; for accident and incident reporting; 	<p>Consent</p> <p>Legal Obligation</p> <p>Contract</p> <p>Our Legitimate Interests:</p> <ul style="list-style-type: none"> to keep visitors safe and protected; to manage use of our buildings; and

Relating to	Description of personal data	Why we use your personal data	Lawful basis
	<ul style="list-style-type: none"> Information about your visit such as the purpose or contact you are meeting CCTV incl. images Duration on sites Access control information Wi-fi log in and usage Sensitive data including dietary requirements or accessibility needs 	<ul style="list-style-type: none"> to allow visitors at SEGRO offices to use the wi-fi. to operate and maintain access and facilitate health & safety requirements 	<ul style="list-style-type: none"> for evidential purposes including in the exercise or defence of a legal claim.
Party (or potential party) to a property transaction with us such as customers and joint venture partners	<ul style="list-style-type: none"> Contact details including first and last name Company and professional information such as occupation, title and role Identification information including date of birth, residential address, nationality, residency status, political affiliations and directorships held, and in some instances biometric data Bank account information and other payment details Credit, tax and financial information Your interests including 	<ul style="list-style-type: none"> to facilitate leasing and property transactions; to enter into contracts; to carry out KYC checks and verification of people and funds; and for compliance purposes including to prevent money laundering and fraud and to conduct sanctions screenings. to conduct credit and financial background checks 	<p>Legal obligation including with respect to:</p> <ul style="list-style-type: none"> anti-money laundering sanctions legislation <p>Contract</p> <p>Legitimate Interests of us and our third parties:</p> <ul style="list-style-type: none"> in verifying contacts and relationships; and furthering the growth of our businesses.

Relating to	Description of personal data	Why we use your personal data	Lawful basis
	information extracted from share registers		
Current shareholder or former shareholder	<ul style="list-style-type: none"> • Contact details including first and last name, email address and telephone number and registered address • Shareholding and communication method preference • Bank account details where provided • Photographs and/or videos where specified at general meetings or other presentations to shareholders if you attend such events • information about transactions and investments you have made • voting preference at general meetings; • information about other people, such as spouses, joint holders, appointed proxies, corporate representatives and other connected parties 	<ul style="list-style-type: none"> • to manage and operate your shareholding in SEGRO • to keep your shareholder records up to date; • to make shareholder communications and shareholder meeting materials available to you; • to pay dividends to you; • to allow you to exercise your rights as a shareholder, such as a right to vote at shareholder meetings; and • for the purposes of providing information on our financial performance to you; • to facilitate results presentations and investor relation events; and • to respond to any correspondence that you send to us or to our Registrar 	<p>Consent</p> <p>Contract</p> <p>Legal Obligation including in relation to UK listed company compliance, regulations and laws</p>
Engaged with us for marketing / advertising	<ul style="list-style-type: none"> • Contact details including first and last name • Email addresses 	<ul style="list-style-type: none"> • to facilitate communication; • to invite you to and effectively manage events, workshops and presentations 	Our Legitimate Interests:

Relating to	Description of personal data	Why we use your personal data	Lawful basis
	<ul style="list-style-type: none"> • Telephone numbers • Photography or videography relating to you • Sensitive data including dietary requirements or accessibility needs. 	<ul style="list-style-type: none"> • to facilitate communication for marketing / advertising including social media; and • for publications, press releases and other communications; • for prize draws at events, subject to the terms of such prize draw; • for marketing / advertising via our social media platforms 	<ul style="list-style-type: none"> • build and maintain relationships with third parties; and • grow our business.
You are a participant in one of our community investment programmes or Responsible SEGRO initiatives;	<ul style="list-style-type: none"> • Contact details including first and last names • Company names • Associations including school or workshop • Your relationship including child and parent/guardian • Email addresses • Photography or videography relating to you 	<ul style="list-style-type: none"> • for marketing/advertising, including via our social media platforms; • for publications, press releases and other communications; • to manage and facilitate events, including site visits, workshops, volunteer programmes, community events and networking activities; • to communicate effectively with participants 	<p>Legal obligation</p> <p>Consent</p> <p>Our Legitimate Interests:</p> <ul style="list-style-type: none"> • to participate and engage in community investment programmes; • share our initiatives and activities including marketing, advertising or publications and general communications; and • to grow our business.
All data subjects	<ul style="list-style-type: none"> • Contact details including first and last names; • Date of birth; • Address; • Personal and professional contact details (including, where relevant, telephone number and email address); • Job title; • LinkedIn URL (including profile photo); • Gender 	<ul style="list-style-type: none"> • to facilitate communication; and • for the purposes of complaints handling • in the administration of insurance and health and safety cover and processing any claims 	<p>Consent</p> <p>Our Legitimate Interests:</p> <ul style="list-style-type: none"> • to deal with complaints and queries and • in the exercise or defence of a legal claim • to validly record any health and safety incidents, insurance and third party claims.

Relating to	Description of personal data	Why we use your personal data	Lawful basis
	<ul style="list-style-type: none"> any contact with SEGRO, prior correspondence and customer support interactions. 		

- 2.2 We do not use your personal data for automated decision making.
- 2.3 If you do not provide personal data then, depending on the purpose for which the data is required, we may be unable to comply with our legal or contractual obligations. This may mean we may not be able to provide you with contractual or legal entitlements and may in certain situations not be able to enter into or continue any applicable engagement with you. Where information is not mandatory, we will make this clear, for instance we will explain if any data fields in our application or survey processes are optional and can be left blank.
- 2.4 Generally, we will only use your personal data for the purposes for which we collected it. If over time we consider that we have a different purpose we will ensure the reason is compatible with the original purpose and where appropriate and/or permitted, generally seek your consent to any new or changed processing.
- 2.5 As noted above in 2.1, some areas of SEGRO premises are covered by CCTV. If you would like further information on our processing via CCTV, please request to see a copy of the CCTV Policy.

3. SOURCES OF PERSONAL DATA

- 3.1 We may collect personal information about you from any of the following sources:
- 3.2 Directly from you;
- 3.3 Internal sources;
- 3.4 Third parties: referees, government bodies and departments, law enforcement agencies and our suppliers, advisers and agents;
- 3.5 Publicly available registers or platforms including social or business networking sites such as X and Facebook (company level information only), and LinkedIn.

4. SHARING OF PERSONAL DATA

- 4.1 SEGRO may transfer personal data to third parties. This is so that we can run our business, comply with laws and rules that apply to us, where it is necessary to administer the terms of your engagement with us, or where we have another legitimate interest in doing so.
- 4.2 Our suppliers, service providers and agents are only permitted to process your personal data for specified purposes, in accordance with our instructions.

4.3 This table describes our sharing of personal data including who we share with, the reasons why and if any personal data is transferred outside of the UK and EEA.

Relating to	Third Parties	Data Sharing Purposes	Transfers out of the EEA
Our service partners, suppliers or customers including contractors and any representatives of such.	<ul style="list-style-type: none"> Our service partners, suppliers or customers Contractors and any representatives of service partners, suppliers or customers. Building managers / concierge service providers 	<ul style="list-style-type: none"> to the extent necessary for them to perform their services to us. to facilitate communication to enable sufficient background checks and compliance requirements to comply with applicable laws to provide access to premises or buildings for fire evacuation purposes or other health and safety requirements 	We may transfer your personal data outside the EEA (see below).
Our service partners, suppliers or customers including contractors and any representatives of such in connection with our customer Intelligence Platform: Introhive	<ul style="list-style-type: none"> Introhive and such sub-processors as approved pursuant to contract 	<ul style="list-style-type: none"> To effectively utilise and enrich the data to allow us to develop our customer relationship management. 	We may transfer your personal data outside the EEA (see below).
Visitor to one of our buildings or offices	<ul style="list-style-type: none"> Lawyers, insurance brokers, and other professional advisers Law enforcement Building managers / any concierge service providers 	<ul style="list-style-type: none"> Lawyers, insurance brokers, and other professional advisers: <ul style="list-style-type: none"> Where we seek advice or need to defend or bring a claim; where information relates to incidents including health and safety; for security reasons; and 	We do not transfer any of this personal data outside the EEA.

Relating to	Third Parties	Data Sharing Purposes	Transfers out of the EEA
		<ul style="list-style-type: none"> ○ for matters giving rise to an insurance claim or relevant to our insurance coverage. • Police: <ul style="list-style-type: none"> ○ in the event of a criminal incident. • Building manager: <ul style="list-style-type: none"> ○ To provide access to the building and concierge services on our behalf (if relevant) ○ For fire evacuation purposes and other health and safety requirements 	
Party (or potential party) to a property transaction with us such as customers and joint venture partners	<ul style="list-style-type: none"> • Joint venture partners • Lawyers • Banks • Agents and other professional advisers • AML third party providers • Sanction screening providers • Auditors • Local and statutory authorities 	<ul style="list-style-type: none"> • Joint venture partners, lawyers and banks: <ul style="list-style-type: none"> ○ to manage and administer our portfolio ○ to perform our agreements. • Agents and other professional advisers: <ul style="list-style-type: none"> ○ to progress and complete transactions. • AML and sanction screening providers: <ul style="list-style-type: none"> ○ To carry out credit and finance checks, identity verification for anti-money laundering checks and sanctions screenings. • Local and statutory authorities: <ul style="list-style-type: none"> ○ to meet our legal obligations. 	We may transfer your personal data outside the EEA (see below).
Current shareholder or former shareholder	<ul style="list-style-type: none"> • Our share scheme provider Equiniti 	<ul style="list-style-type: none"> ○ to respond to, or assist us to respond to, any correspondence you send; ○ to manage, on your behalf, your shareholding in SEGRO; and ○ to keep your shareholding record up to date. 	We may transfer your personal data outside the EEA (see below).
Engaged with us for marketing / advertising	<ul style="list-style-type: none"> • Our service partners including photographers / videographers 	<ul style="list-style-type: none"> • Our service partners: <ul style="list-style-type: none"> ○ to the extent necessary for them to perform their services to us. • Project manager: <ul style="list-style-type: none"> ○ for health and safety reasons. 	We do not transfer any of this personal data outside the EEA.

Relating to	Third Parties	Data Sharing Purposes	Transfers out of the EEA
	<ul style="list-style-type: none"> Joint hosts or event organisers Project Managers Consultants, contractors, and sub-contractors PR Agencies 	<ul style="list-style-type: none"> Joint hosts or event organisers: <ul style="list-style-type: none"> to share the attendance list when we hold a joint event with a third party in respect of a project. Corporate PR agency: <ul style="list-style-type: none"> to the extent necessary for them to perform their services to us, including facilitating investor relations events. 	
You are a participant in one of our community investment programmes or Responsible SEGRO initiatives	<ul style="list-style-type: none"> Event organisers 	<ul style="list-style-type: none"> Event organisers: <ul style="list-style-type: none"> to manage and coordinate events; to communicate with participants. 	We do not transfer any of this personal data outside the EEA.
All data subjects	<ul style="list-style-type: none"> Within the group of companies 	<ul style="list-style-type: none"> For our general business and management purposes; To meet client needs where working across offices/locations; For line management, authorisations or approvals with relevant decision makers; Group reporting and strategy; To manage risk; and Where systems and services are provided on a shared basis. 	We do not transfer any of this personal data outside the EEA.
All data subjects	<ul style="list-style-type: none"> Lawyers Accountants Agents Stock brokers Insurance brokers Consultants Banks 	<ul style="list-style-type: none"> Where SEGRO is making an acquisition or disposal To facilitate the transaction including , for example, sharing information in the due diligence stage To facilitate and perform our agreements. 	We may transfer your personal data outside the EEA (see below).

Relating to	Third Parties	Data Sharing Purposes	Transfers out of the EEA
	<ul style="list-style-type: none"> Data Room providers 	<ul style="list-style-type: none"> To advise and facilitate any associated payments and tax payments. 	

5. STORAGE OF INFORMATION

- 5.1 Your personal data will be stored locally by us but may also be stored and backed up on servers located outside of the UK and European Economic Area (EEA). Please see section 6 below for information on how we safeguard your data in these circumstances.

6. INTERNATIONAL TRANSFERS OF PERSONAL DATA OUTSIDE THE EEA

- 6.1 We only send your personal data outside the EEA to:
- 6.1.1 Follow your instructions;
 - 6.1.2 Comply with a legal duty;
 - 6.1.3 Work with our group companies, suppliers and service providers that are based outside the EEA; or
 - 6.1.4 Work with financial institutions and joint venture partners that are based outside the EEA.
- 6.2 If we transfer your personal data outside the EEA, we will implement one of the following safeguards:
- 6.2.1 Transfers to a non-EEA country that has been deemed to provide an adequate level of protection for personal information by the European Commission. For further details, see European Commission: Adequacy of the protection of personal information in non-EU countries. (The UK has published “adequacy regulations” in relation to countries within the EEA and some countries outside of the EEA, which means that these countries are considered under UK data protection law, to provide an adequate level of protection for personal data. (See the ICO’s guidance on international transfers for a list of countries deemed adequate.)
 - 6.2.2 Put in place a contract with the recipient that means they must protect it to the equivalent standards as the EEA including standard contractual clauses for data transfers between EU and non-EU countries; the UK Information Commissioner’s International Data Transfer Agreement / Addendum and any other appropriate safeguard in place from time to time.

7. DATA RETENTION

- 7.1 We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. In many cases, this will require us to get your express consent to use your information for such an unrelated purpose.

- 7.2 Your personal information will only be retained for as long as is reasonably necessary. What this means in practice will vary as between different types of information, and when we consider our approach, we take into account the following:
- 7.2.1 the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data,
 - 7.2.2 the purposes for which we process your personal data and whether we can achieve those purposes through other means,
 - 7.2.3 if you have made a request to have your personal data deleted (see section 9 of this notice);
 - 7.2.4 guidelines issued by relevant data protection regulators; and
 - 7.2.5 the applicable legal requirements for example in relation to tax, health and safety, employment rights and potential or actual disputes or investigations.
- 7.3 When we no longer need your personal information, it will be deleted.
- 7.4 In relation to the processing activities carried out through Introhive, please note that data and information collected through the platform will be retained as long as necessary to pursue the objectives it was collected for, and generally, for reasons including efficiency and sustaining valuable relationships, until the termination of your customer/supplier relationship with us. In some circumstances data may be retained for a longer period to maintain a business contact with you and to continue maintaining business relationships for related purposes. Where appropriate, information will be removed from SEGRO's internal systems or anonymised.
- 7.5 In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

8. YOUR DATA ACCESS RIGHTS

- 8.1 You have certain additional rights, beyond receiving this notice, in relation to your personal data as summarised in the table below

Rights	What does this mean?
The right to be informed	You have the right to be provided with clear, transparent and easily understandable information about how we use your information and your rights. This notice is an example of this right.
The right of access	You have the right to obtain a copy of personal data relating to you (and other information) from us where we are processing it. This is so you are aware and can check that we are using your information in accordance with data protection law.
The right to rectification	You are entitled to have your information corrected if it is inaccurate or incomplete. It is important that the personal data we

Rights	What does this mean?
	hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.
The right to erasure	This enables you to request the deletion or removal of your personal data where there is no compelling reason for us to keep using it.
The right to restrict processing	<p>You have the right to ‘block’ or suppress further use of your personal data that we process. This means that it can only be used for certain things, such as legal claims or to exercise legal rights.</p> <p>You can ask us to restrict the use of your personal data if it is not accurate; it has been used unlawfully but you don’t want us to delete it; it is not relevant any more, but you want us to keep it for use in legal claims; or you have already asked us to stop using your data but you are waiting for us to tell you if we are allowed to keep on using it. If we do restrict your information in this way, we will not use or share it in other ways while it is restricted.</p>
The right to data portability	You have the right to receive your personal data in a structured, commonly used and machine-readable format and to request that this data is transmitted to another party/controller where this is technically feasible. This right only applies to personal data you have directly provided to us (not any other information).
The right to lodge a complaint	You have the right to lodge a complaint about our handling or processing of your personal data to data protection regulators. (See section 9 for further details).
The right to withdraw consent	Where you have given your consent to us for the processing of any personal data, you have the right to withdraw your consent at any time (although this does not mean that any processing of personal data carried out by us with your consent up to that point is unlawful).

9. CONTACTING US AND MAKING A COMPLAINT

- 9.1 To exercise your rights, raise any complaints or to contact us with any questions regarding the processing of your personal data, please contact us by dataprotection@segro.com.
- 9.2 You can also complain to the ICO if you are unhappy with how we have used your data. The ICO’s contact details are:

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

10. CHANGES TO THIS PRIVACY POLICY

- 10.1 The current version of the External Privacy Notice is 1.00.
- 10.2 We reserve the right to modify and/or update this privacy notice at any time. We may modify this notice to ensure it is accurate and up to date and to reflect changes in the law, the practice of the competent data protection authority, business needs and any new activity involving personal data processing. We will notify you when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.
- 10.3 Upon request by you, we will send you a copy of the latest updated version of this notice.

This policy was last updated on 10 June 2025.