

Last updated: 12-08-2021

# PRIVACY POLICY

## About this Policy

**GHG B.V.** (“us” or “we”) are dedicated to protecting the privacy of your personal data, which is any information relating to an identified or identifiable natural person. This Privacy Policy describes how we collect, use, store and share information we collect from or about you in connection with the product or service you have requested from us and/or the nature of your interaction with us (the “Services”). Your use of certain Services offered by us may be subject to other terms and conditions or additional privacy notices (for example, if you are you register for a property-specific mobile app). This policy also explains your choices about how we use information about you.

This Privacy Policy does not apply to the practices of companies that we do not own or control, or to people who we do not employ or manage. We cannot guarantee the confidentiality of electronic communication, and as such, you should carefully consider whether to submit sensitive information that you would not want made public, and should recognize that your use of the Services is solely at your own risk. Accordingly, please read this policy carefully to understand our practices with respect to your personal data. By using any of the Services, you are permitting us to collect, use, store and disclose your personal data in accordance with this Privacy Policy.

## Definitions

‘personal data’ means any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular 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;

‘processing’ means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

‘restriction of processing’ means the marking of stored personal data with the aim of limiting their processing in the future;

‘profiling’ means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyze or predict aspects concerning that natural person’s performance at work, economic situation, health, personal preferences, interests, reliability, behavior, location or movements;

‘pseudonymization’ means the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organizational

measures to ensure that the personal data are not attributed to an identified or identifiable natural person;

‘filing system’ means any structured set of personal data which are accessible according to specific criteria, whether centralized, decentralized or dispersed on a functional or geographical basis;

‘controller’ means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;

‘processor’ means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

‘recipient’ means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing;

‘third party’ means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorized to process personal data;

‘consent’ of the data subject means any freely given, specific, informed and unambiguous indication of the data subject’s wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;

## Name and contact details of the controller

GHG B.V.  
c/o Jamestown Europe Management B.V.  
39 Pilotenstraat  
1059CH Amsterdam  
Netherlands

[jamestownlp.com/imprint](http://jamestownlp.com/imprint)

## Contact details of the data protection officer

Jamestown Europe GmbH, located in Cologne, Germany, and Jamestown Europe Management B.V., located in Amsterdam, the Netherlands, have appointed an external data protection officer who can be reached through the following contact details.

Postal:  
Jamestown Europe GmbH  
Attn: Data Protection Officer

Marienburger Str. 17  
50968 Cologne  
Germany  
Email: [privacy@jamestown.de](mailto:privacy@jamestown.de)

Postal:  
Jamestown Europe Management B.V.  
Attn: Data Protection Officer  
39 Pilotenstraat  
1059CH Amsterdam  
Netherlands  
Email: [privacy@jamestown.de](mailto:privacy@jamestown.de)

Any data subject may contact our data protection officer directly at any time with any questions or suggestions regarding data protection.

## Information Collected

In connection with your use of the Services and your interactions with us, we may collect the following information:

- Identifiers (such as your name, address, email address, telephone number);
- Internet or other electronic network activity information when you use our websites, property-specific mobile apps or Wi-Fi network (such as your Internet protocol address, cookie identifiers, mobile carrier, mobile advertising identifiers, MAC address, advertiser ID, and other device identifiers, browser type, hardware type, operating system, Internet service provider, user preferences, and information about the pages you visit, the date and time, the amount of time you spend on each page, and the links you click within the Services);
- Inferences drawn from any of the foregoing or following information; and
- Certain other information, depending on the specific product or service you have requested from us and/or the nature of your interaction with us, as further detailed below.

Investors	In connection with the acquisition of property and the formation and ongoing activities of a property-owning entity, we may also collect and maintain the following personal data about our investors: <ul style="list-style-type: none"><li>● Identifiers (date of birth, tax identification number/social security number);</li><li>● Other information (financial account information, copy of government issued identification);</li><li>● Commercial information (products or services purchased); and</li><li>● Professional and employment information.</li></ul>
Tenants	In connection with the leasing or licensing of space in our properties, we may also collect and maintain the following personal data about prospective and current tenants:

	<ul style="list-style-type: none"> <li>● Identifiers (date of birth, tax identification number);</li> <li>● Other information (financial account information, copy of government issued identification);</li> <li>● Commercial information (lease or license information, car details for parking registration);</li> <li>● Geolocation data (physical location and movements based on access badge usage records); and</li> <li>● Electronic, visual or similar information (including security cameras at the property).</li> </ul>
Vendors	<p>In connection with engaging third parties to perform services or provide goods for our company, we may also collect and maintain the following personal data about our vendors:</p> <ul style="list-style-type: none"> <li>● Identifiers (date of birth, tax identification number);</li> <li>● Other information (financial account information, copy of government issued identification);</li> <li>● Commercial information (products or services purchased, car details for parking registration);</li> <li>● Geolocation data (physical location and movements based on access badge usage records); and</li> <li>● Professional and employment information.</li> </ul>
Customers and Guests at our Properties	<p>We may also collect and maintain the following personal data about our customers and guests at our properties:</p> <ul style="list-style-type: none"> <li>● Commercial information (including records of personal property, such as information on your vehicle for onsite parking at our properties);</li> <li>● Geolocation data (including your physical location or movements, such as those shown by mobile location analytics which capture and analyze signals from mobile devices); and</li> <li>● Electronic, visual, or similar information (including security recordings at our properties).</li> </ul>
Visitors and Guests of our Online services	<p>We may also collect and maintain the following personal data about visitors and guests on our online Services:</p> <ul style="list-style-type: none"> <li>● Age range, gender, and interests if linking social media accounts;</li> <li>● Your organization/company, title, and website address;</li> <li>● Aggregated, statistical and summary information of the general behavior and characteristics of users visiting or participating in our online Services; and</li> <li>● Other information as noted in the privacy notice specific to that service.</li> </ul>

## Purpose

We and our affiliates and nonaffiliated third parties collect and process such personal data in connection with the following:

- Providing you with the Services;
- Responding to your inquiries or fulfilling requests for us to contact you;
- Acting in compliance with our legal obligations, rights, and interests;
- Sending marketing or promotional communications relating to our business, products or services to you;
- Preventing fraud, responding to judicial process and subpoenas, and complying with federal, state, and local laws, as well as regulatory requirements; and
- Certain other purposes, depending on the specific product or service you have requested from us and/or the nature of your interaction with us, as further detailed below.

Investors	<p>We may also collect and process personal data of investors of property-owning entities we provide asset management services to in connection with:</p> <ul style="list-style-type: none"> <li>● The issuance of the shares/interests to you;</li> <li>● The processing and management of the shares/interests, including processing payments and distributions, accounting, auditing, reporting to you, as well as reporting to third party service providers and appropriate government entities, including tax authorities and other governmental and regulatory agencies; and</li> <li>● Obtaining financing for properties with respect to anti-money laundering, sanctions and know your customer checks.</li> </ul>
Tenants	<p>We may also collect and process personal data of our tenants in connection with:</p> <ul style="list-style-type: none"> <li>● Maintaining logs of access badges, parking registration;</li> <li>● Maintaining safety and security; and</li> <li>● Documenting waivers in connection with tenant amenities such as gym access, bike rentals and dogs on property.</li> </ul>
Vendors	<p>We may also collect and process personal data of our vendors in connection with:</p> <ul style="list-style-type: none"> <li>● Maintaining logs of access badges and parking registration; and</li> </ul> <p>Maintaining safety and security.</p>
Customers and Guests at our Properties	<p>We may also collect and process personal data of customers and guests at our properties in connection with:</p> <ul style="list-style-type: none"> <li>● Registering you for events or registering you as a visitor at the property; and</li> <li>● Maintaining safety and security.</li> </ul>
Visitors and Guests of our Online services	<p>We may also collect and process the personal data of visitors and guests on our online Services in connection with:</p>

	<ul style="list-style-type: none"> <li>● Operating and improving our Services, maintaining the integrity of our network, addressing security issues, investigating or taking action regarding complaints, violations or suspected violations of law or our terms of service;</li> <li>● Communicating with you about upcoming events or other products and services offered by us, our affiliates or others (such as tenants in our properties or providers of services to tenants or visitors in our properties) in which we believe you may have an interest;</li> <li>● Other purposes as noted in the privacy notice specific to that service; and</li> <li>● Tracking and analyzing your consumer behavior and location within our properties.</li> </ul>
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## Sources of Information

We generally collect and maintain certain personal data from the following sources:

- Information we receive from you on forms, contracts or that you otherwise submit to us;
- Information about your transactions with us, our affiliates, and nonaffiliated third parties;
- Information obtained from meetings and telephone conversations with you;
- Information you provide when requesting us to contact you or respond to an inquiry;
- Information obtained automatically about your activity on our internet sites, property-specific mobile apps, or Wi-Fi networks;
- Information obtained from onsite security videos;
- Information obtained from public databases;
- Information obtained from affiliated and non-affiliated third parties;
- Certain other information, depending on the specific product or service you have requested from us and/or the nature of your interaction with us, as further detailed below.

Investors	<p>We may also collect and maintain personal data of investors in property-owning entities to which we provide asset management services from the following sources:</p> <ul style="list-style-type: none"> <li>● Information that you submit to us or contracts that you enter into with us; and</li> <li>● Information obtained from third parties, portfolio managers, tax advisors and similar third party providers.</li> </ul>
Tenants	<p>We may also collect and maintain personal data of our tenants from the following sources:</p> <ul style="list-style-type: none"> <li>● Information we receive from you on lease or license agreements, guarantees, financial statements, waivers, other forms, or that you otherwise submit to us or contracts that you enter into with us;</li> </ul>

	<ul style="list-style-type: none"> <li>● Information about your location based on your access card usage within our properties; and</li> <li>● Information obtained from third parties, including property management, leasing brokers, third party diligence services.</li> </ul>
Vendors	<p>We may also collect and maintain personal data of our vendors from the following sources:</p> <ul style="list-style-type: none"> <li>● Information we receive from you on invoices, purchase orders, product or services agreements, other forms, or that you otherwise submit to us or contracts that you enter into with us; and</li> <li>● Information obtained from third parties, including information in diligence reports provided by third parties.</li> </ul>
Customers and Guests at our Properties	<p>We may also collect and maintain personal data of customers and guests at our properties from the following sources:</p> <ul style="list-style-type: none"> <li>● Information we receive from you on sign-up forms for newsletters, information or events, Wi-Fi login, other forms, or that you otherwise submit to us; and</li> <li>● Information obtained from third parties, such as Wi-Fi based location analytics and mobile location analytics.</li> </ul>
Visitors and Guests of our Online services	<p>We may also collect and maintain personal data of visitors and guests of our online Services from the following sources:</p> <ul style="list-style-type: none"> <li>● Information we receive from you on sign-up forms for newsletters, information or events, Wi-Fi login, other forms, or that you otherwise submit to us;</li> <li>● Information obtained from third parties, such as Wi-Fi based location analytics, or social media accounts you link during registration for use of our Wi-Fi network;</li> <li>● Other sources as noted in the privacy notice specific to that service; and</li> <li>● Information obtained from third parties, such as from digital marketing and public relations service providers.</li> </ul>

## Information Disclosed/Shared with Third Parties

In order to provide you with the applicable products and services or fulfill our contract with you, we may disclose such personal data to our affiliates and nonaffiliated third parties as permitted by law, including:

- Our affiliates and subsidiaries;
- Service providers to our company, such as accounting, legal, payroll, and tax service providers;
- Other third party service providers we may engage to provide services such as analytics and marketing, advertising, communications, customer service, payment processing, infrastructure and information technology services, property management services and others as appropriate;

- A third party in the event of a merger, acquisition, bankruptcy, or other transaction in which the third party assumes control of all or part of the business;
- For purposes of preventing fraud, responding to judicial process and subpoenas, and complying with federal, state, and local laws; and
- Other parties depending on your relationship with us, as detailed below.

Investors	We may also disclose the personal data of investors to: <ul style="list-style-type: none"> <li>• Transfer agents, portfolio companies, brokerage firms, platform providers, escrow agents, account managers, and the like in connection with processing payments and distributions.</li> </ul>
Tenants	We may also disclose the personal data of tenants to: <ul style="list-style-type: none"> <li>• Property management/administration, security and parking services at the property.</li> </ul>
Vendors	We may also disclose the personal data of vendors to: <ul style="list-style-type: none"> <li>• Property management/administration, security and parking services at the property.</li> </ul>
Customers and Guests at our Properties	We may also disclose personal data of customers and guests at our properties to: <ul style="list-style-type: none"> <li>• Property management/administration, security and parking services at the property.</li> </ul>
Visitors and Guests of our Online services	We may also disclose personal data of visitors and guests of our online Services to: <ul style="list-style-type: none"> <li>• Others as noted in the privacy notice specific to that service.</li> </ul>

If one of the foregoing service providers needs to access Personal data to perform services on our and your behalf, they are only authorized to collect, use, disclose, and store the Personal data as described in our contract with them, including requirements to maintain reasonable security procedures.

We do not sell your personal data to third parties, and we do not rent, or share your personal data with third parties for such third parties' direct marketing.

## Cookies

Cookies are small pieces of text that are transferred to your browser to enable our Services to recognize your device and to help us improve how our Services work. We use first party cookies, which are served directly by us to your browser as well as third party cookies which are served by a third party on our behalf. We use cookies which allow us to remember your preferences (such as your location or your preferred language) and help our Services to function properly. We also use cookies to authenticate users, prevent fraudulent use of login credentials and protect user data from unauthorized parties. We use other cookies to remember your recent searches and your interactions with certain ads and websites, and use this information to show you customized content tailored to your interests. The cookies we use include both session cookies, which are deleted after you close down your browser, and



persistent cookies, which are more permanent and store certain information about your use of the Services.

With your consent, we use optional tools for usage analysis, marketing purposes and to display personalized content on our website. Your consent also includes the transfer of data to third countries that do not have a level of data protection comparable to the EU. If personal data is transferred there, there is a risk that authorities may collect and analyze it and that your data subject rights may not be enforced. You can revoke your consent to data processing and deactivate tools at any time in the cookie settings (link).

The following describes the essential cookie integrations:

- a) We have integrated the **Google Analytics** pixel (with anonymization function) on our website. Google Analytics is a web analysis service. Web analysis is the collection, compilation and evaluation of data about the behavior of visitors to website. A web analysis service collects, among other things, data on which website a data subject came to a website from (so-called referrers), which sub-pages of the website were accessed or how often and for how long a sub-page was viewed. A web analysis is mainly used for the optimization of a website and for the cost-benefit analysis of internet advertising.

The operating company of the Google Analytics component is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland.

We use the add-on "gat.\_anonymizeIp" for web analysis via Google Analytics. By means of this addition, the IP address of the Internet connection of the person concerned is shortened and anonymized by Google if access to our website is from a member state of the European Union or from another state party to the Agreement on the European Economic Area.

Google Analytics sets a cookie on the information technology system of the data subject. With your consent to the cookie setting for statistical purposes, Google is enabled to analyze the use of our website. Each time you call up one of the individual pages of this website operated by Jamestown on which a Google Analytics component has been integrated, the Internet browser on the information technology system of the data subject is automatically triggered by the respective Google Analytics component to transmit statistical data to Google for the purpose of online analysis. With your consent of the cookie setting for personalized purposes, the transfer of data to Google Analytics is also used to play out personalized content. As part of this technical procedure, Google obtains knowledge of personal data, such as the anonymized IP address of the data subject, which Google uses, among other things, to track the origin of visitors and clicks and subsequently enable commission calculations.

By means of the cookie, some personal information, such as the access time, the place from which an access originated and the frequency of visits to our website by the data subject, is stored. Each time our websites are visited, this personal data is transmitted to Google in the United States of America. Google may pass on this personal data to third parties.

Further information and the applicable data protection provisions of Google can be found at <https://policies.google.com/privacy> and <https://www.google.com/analytics/terms/de.html>.

- b) We have integrated the **Facebook pixel** on our website. Facebook and its subsidiary Instagram are social networks operated by Facebook Inc., 1 Hacker Way, Menlo Park, CA 94025, USA. The controller of your personal data if you live outside the USA or Canada is Facebook Ireland Ltd, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland.

Within our online offer, the Facebook pixel is used for purposes of analysis, optimization of our website as well as for advertising purposes.

If the data subject has consented to the use of cookies and associated tracking services, the so-called "conversion tracking" has been activated by setting a cookie on the respective end devices. Conversion tracking means that usage and click behavior is tracked in order to optimize the structure of our website and future advertisements for the user. The information generated in this way cannot be linked to individual users, as it is anonymous for us.

Facebook recognizes which specific sub-page of our website the data subject is visiting with each call-up of our website by the data subject and for the entire duration of the respective stay on our website. Facebook uses an HTML code snippet as a tracking pixel, which calls up a Facebook URL enriched with parameters on each sub-page of a website, with the help of which Facebook interprets the data received. The transferred data does not reveal any specific individuals, as the unique identifier is encrypted on the profile on Facebook and Instagram. Furthermore, no individual persons are addressed, but only groups of at least 20 users who exhibit similar behavior. Facebook uses a so-called hashing process for this, in which personal data is encrypted in such a way that Facebook can no longer assign it to individual users.

The privacy policy published by Facebook, available at <https://de-de.facebook.com/about/privacy/>, provides information about the collection, processing and use of personal data by Facebook. It also explains which setting options Facebook offers for protecting the privacy of the data subject and for advertising preferences.

- c) We have integrated the **LinkedIn pixel** on our website. LinkedIn is a service that qualifies as an occupational and career network, and offers users the opportunity to search for jobs and to link their own profile with those of companies and private individuals. The operating company of LinkedIn's services is LinkedIn Ireland Unlimited Company ("LinkedIn Ireland") Wilton Place, Dublin 2, Ireland. As with the Facebook pixel, "conversion tracking" is activated here after consent has been given to the use of cookies and associated tracking services by setting a "browser cookie" on the respective end devices. Conversion tracking means that usage and click behavior is tracked in order to optimize the structure of our website and future advertisements for the user. Provided you visit our website and are logged into your LinkedIn profile at the time, reports can be generated on the performance of the advertisements and the interactions on our website. This is done by integrating the LinkedIn Insight tag on our website and connecting to the LinkedIn server. The information generated by the conversion tracking and LinkedIn insight tag cannot be linked to individual users, as it is anonymous for us.

LinkedIn recognizes with each call of our website by the data subject and during the entire duration of the respective stay on our website, which specific sub-page of our website the data subject visits. LinkedIn uses an HTML code snippet as a tracking pixel, which calls up a LinkedIn URL enriched with parameters on each sub-page of a website, with the help of which LinkedIn interprets the data received. The transferred data does not allow conclusions to be drawn about specific persons, as the unique identification is encrypted at the profile on LinkedIn.

For more information on data processing and use, please see LinkedIn's privacy policy at <https://www.linkedin.com/legal/privacy-policy>.

## Security

To protect your personal data from unauthorized access and use, we use security measures that comply with applicable law and industry standards. These measures include computer safeguards and secured files and buildings. We restrict access to personal data to those employees, affiliates, agents, and third parties who have a need to know the information to perform a business purpose. We maintain physical, electronic, and procedural safeguards reasonably designed to protect the personal data while it is within our control.

## Data Retention and Disposal

The personal data may be stored in our technology systems or those of our service providers, or in paper files. We will delete your personal data when it is no longer reasonably required for the uses described herein, or when you withdraw your consent or request erasure, to the extent that we are not legally required or otherwise permitted to continue to hold such data. Since we maintain our applications and systems to protect against accidental or malicious loss and destruction, residual copies of your personal data may be retained in our backup and archival systems for a limited period of time, after which the information will be automatically deleted or made unusable where deletion is not possible.

## How to Access and Control your Information

We may send you marketing materials in which we believe you may have interest, and will comply with your request to stop sending any such further communications. You may unsubscribe from our marketing communications by clicking on the “unsubscribe” link in such email communications.

Where appropriate and where applicable by law, we shall provide you with the following individual rights with respect to your personal data:

- **The right to access** – You have the right to request copies of your personal data. We may charge you a small fee for this service.
- **The right to rectification** – You have the right to request that we correct any information you believe is inaccurate. You also have the right to request that we complete the information you believe is incomplete.
- **The right to erasure** – You have the right to request that we erase your personal data, under certain conditions.
- **The right to restrict processing** – You have the right to request that we restrict the processing of your personal data, under certain conditions.
- **The right to object to processing** – You have the right to object to our processing of your personal data, under certain conditions.
- **The right to data portability** – You have the right to request that we transfer the data that we have collected to another organization, or directly to you, under certain conditions.
- **The right to not be subjected to automated decision making** - We do not subject you to decisions based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.
- **The right to lodge a complaint** – You have the right to lodge a complaint with supervisory authorities regarding the processing of your personal data. Should you wish to report a complaint or if you feel that we have not addressed your concern in a satisfactory manner, you may contact the appropriate supervisory authority as follows:

The supervisory authority responsible **Jamestown Europe GmbH** is:

Landesbeauftragte für Datenschutz und Informationsfreiheit Nordrhein-Westfalen (LDI NRW)  
Kavalleriestr. 2-4  
40213 Düsseldorf  
Phone: +49 211 38424-0  
Fax: +49 211 38424-10  
Email: poststelle(at)ldi.nrw.de

The supervisory authority responsible for **Jamestown Europe Management B.V.** is:

Autoriteit Persoonsgegevens  
PO Box 93374  
2509 AJ Den Haag  
Phone: +31 70 888 85-00  
Fax: +31 70 888 85-01  
Email: info@autoriteitpersoonsgegevens.nl

You can exercise your rights with respect to your personal data by contacting us via email or postal through the contact details shown at the beginning of policy. To the extent we are processing the personal data based on your consent, you may withdraw such consent at any time, provided that such personal data is not required by a legal obligation. You may unsubscribe from our marketing communications by clicking on the “unsubscribe” link in such email communications.

We require certain information to provide our Services to you. For example, we must collect certain personal data from investors, tenants and vendors to comply with legal obligations. We also require certain personal data to provide you with access to certain websites, apps and networks. If you do not wish to share such required personal data, we may not be able to provide you with certain Services.

## Legal Basis for Processing

We collect and process information about you only where we have legal basis for doing so under applicable laws. The legal basis depends on the Services you use and how you use them. This means we collect and use your information only where: (i) we need it to provide you the Services, including to operate the Services, provide customer support and personalized features and to protect the safety and security of the Services; (ii) it satisfies a legitimate interest (which is not overridden by your data protection interests), such as to market and promote the Services and to protect our legal rights and interests; (iii) you give us consent to do so for a specific purpose; or (iv) we need to process your data to comply with a legal obligation. If you have consented to our use of information about you for a specific purpose, you have the right to change your mind at any time, but this will not affect any processing that has already taken place. Where we are using your information because we or a third party have a legitimate interest to do so, you have the right to object to that use though, in some cases, this may mean no longer using the Services.

## International Data Transfers

We have personnel and affiliates internationally, including in the United States, which means Information we collect may be processed by us in the U.S. where data protection and privacy regulations may not offer the same level of protection as in other parts of the world, such as the European Union. If you use or visit our Services, you consent to the collection and/or processing in the United States of Information we collect from you. When transferring data outside of the European Union, we endeavor to apply suitable safeguards to protect the privacy and security of your personal data, such as by enter into data processing agreements and model clauses whenever feasible and appropriate.

With your consent, we use optional tools for usage analysis, marketing purposes and to display personalized content on our website. Your consent also includes the transfer of data to third countries that do not have a level of data protection comparable to the EU. If personal data is transferred there, there is a risk that authorities may collect and analyze it and that your data subject rights may not be enforced. You can revoke your consent to data processing and deactivate tools at any time in the cookie settings.

## Changes to Policy

We may periodically modify this Privacy Policy and will promptly post an updated Privacy Policy on <https://www.ghg.nl/en/cookie-statement> showing the date of the update. Please check regularly for the most recent version of our Privacy Policy. You agree that the act of posting a revised Privacy Policy electronically on the website satisfies our obligation to deliver the Privacy Policy to you. Your continued use of the Services after such posting constitute consent to the collection and use of your information as described in the then-current Privacy Policy. If you disagree with any changes made to this Privacy Policy you will need to stop using the Services. We will keep prior versions of this policy which you may request via email to [privacy@jamestown.de](mailto:privacy@jamestown.de).