

Aligned
Real Estate Investment Trust Plc

Privacy Notice (Act 843)

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Introduction: Our Commitment to Your Privacy

This document outlines how Aligned Real Estate Investment Trust Plc (“Aligned”) collects, uses, protects, and manages personal data in full compliance with Ghana's Data Protection Act (Act 843). We are fundamentally committed to safeguarding the privacy of our clients and ensuring complete transparency in all our data processing activities. This policy serves as a cornerstone of our promise to handle your personal information with the utmost care and respect.

1. Data Controller and Contact Information

Under data protection law, the 'Data Controller' is the entity that determines the purposes and means of processing personal data. Aligned is the data controller for all personal data collected and processed as described in this policy and is therefore responsible for its protection.

For any questions regarding this policy, or to exercise your data protection rights, please contact our designated Data Protection Officer (DPO).

Contact the Data Protection Officer. For all data privacy inquiries, please email our DPO at dpo@alignedim.com or write to us, marking the correspondence for the attention of the Data Protection Officer.

This policy will now detail the specific types of personal data we collect to provide our services.

2. Personal Data We Collect

To provide our specialised investment management services and to meet our stringent regulatory obligations, we must collect and process specific categories of personal data. The information we gather is essential for clients' onboarding, account management, and legal compliance.

We collect the following categories of personal data:

- **Identification and Know-Your-Customer (KYC) Data:**
  - Full name, date of birth, and nationality
  - Government-issued identification numbers (e.g., national ID, passport)
  - Signatures and photographs
- **Contact Details:**
  - Physical address, email address, and phone numbers
- **Financial and Transactional Data:**
  - Bank account details
  - Records of payments and portfolio transactions
  - Tenancy or lease data, where applicable to the investment
- **Compliance and Due Diligence Data:**
  - Results from Politically Exposed Person (PEP) and sanctions screening
  - Information gathered during our comprehensive due diligence processes
- **Technical Data (from online interactions):**
  - IP addresses and system logs related to your use of our website or applications

The collection of this data is strictly limited to what is necessary for the specific, lawful purposes outlined in the next section.

3. Purposes and Lawful Bases for Processing

A core principle of data protection is that all processing of personal data must be justified by a valid purpose and a lawful basis under Act 843. The following table details why we process your personal data and the legal grounds upon which we rely.

Purpose of Processing	Lawful Basis
Client Onboarding & Account Administration: Setting up and managing client accounts and investment portfolios.	Performance of a Contract
Regulatory Compliance: Fulfilling legal duties, including Anti-Money Laundering (AML), Counter-Terrorist Financing (CFT), and Counter-Proliferation Financing (CPF) checks.	Legal Obligation / Public Interest
Service Delivery & Fund Administration: Executing transactions and managing investment funds and portfolios effectively.	Performance of a Contract / Legitimate Interests
Security & Fraud Prevention: Protecting client assets and company systems, and responding to security incidents.	Legitimate Interests / Legal Obligation
Marketing Communications: Providing information about our products and services.	Consent / Legitimate Interests (with a clear right to opt-out at any time)

To fulfil these purposes, we obtain data from various sources and may share it with trusted partners, as explained below.

4. Data Sources and Sharing Practices

We collect personal data from several sources and may need to share it with trusted third parties to deliver our services effectively and meet our legal requirements. All data sharing is conducted securely, lawfully, and with strict controls to protect your privacy.

Sources of Personal Data:

- **Directly from you**, the data subject, when you engage with our services.
- **From your authorized representatives**, such as financial advisors or legal guardians.
- **From third-party sources**, including KYC service providers, credit bureaus, and public registers, as part of our due diligence and compliance procedures.

Recipients of Personal Data:

- **Service Providers (Processors):** Trusted partners who perform services on our behalf, such as fund administrators or IT service providers, under strict contractual data protection obligations.
- **Group Companies:** Other entities within the Aligned Investment Management corporate group for purposes of consolidated reporting, shared services, and group-wide security management.
- **Regulators and Law Enforcement:** Authorities such as the Securities and Exchange Commission (SEC), Financial Intelligence Centre (FIC), and the Data Protection Commission (DPC), when required by law or a court order.

Sharing data with certain partners may involve transferring it internationally, which is subject to specific safeguards.

5. International Data Transfers

When we transfer personal data to recipients located outside of Ghana, we are committed to ensuring that your data remains protected to a standard equivalent to that provided by Act 843. We will only conduct such transfers if an adequate level of protection is guaranteed.

To achieve this, we rely on the following legal safeguards:

- **Permits** issued by the relevant data protection authority authorising the transfer.
- **Adequacy Decisions**, where the recipient country has been formally recognised as having data protection laws that provide an adequate level of protection.
- **Standard Contractual Safeguards**, such as approved Standard Contractual Clauses (SCCs), which impose binding and enforceable data protection obligations on the data recipient.

The protection of your data extends throughout its lifecycle, including how long we retain it.

6. Data Retention Policy

Our policy is to retain personal data only for as long as it is necessary to fulfil the purposes for which it was collected and to comply with our legal and regulatory obligations. We do not keep personal data indefinitely.

As a general rule, key data categories, including KYC documentation, transactional records, and complaints data, are retained for a minimum of **six years**. This period may be extended if mandated by law or if the data is required for the establishment, exercise, or defence of legal claims.

As an individual, you have specific rights concerning the data we retain about you.

7. Your Data Protection Rights

Under Ghana's Data Protection Act (Act 843), you are granted several fundamental rights over your personal data. This section outlines these rights and explains how you can exercise them.

- **Right of Access:** You have the right to request and receive a copy of the personal data we hold about you. This is commonly known as a Data Subject Access Request (DSAR).
- **Right to Rectification:** You have the right to have any inaccurate personal data we hold about you corrected without undue delay.

- **Right to Erasure, Restriction, and Objection:** Under specific legal conditions, you have the right to:
    - **Request the deletion** of your personal data (the 'right to be forgotten').
    - **Request the restriction** of our processing of your personal data.
    - **Object to the processing** of your personal data.
- **Right to Withdraw Consent:** Where we rely on your consent for processing, such as for marketing communications, you have the right to withdraw that consent at any time.
- **Right to Lodge a Complaint:** You have the right to file a complaint with the **Ghana Data Protection Commission** if you believe your data protection rights have been infringed.

We are fully committed to upholding these rights and to securing the data you entrust to us.

8. Our Commitment to Data Security

Protecting personal data from unauthorized access, loss, or misuse is a primary corporate responsibility. We have implemented a comprehensive framework of technical and organizational measures to ensure the integrity and confidentiality of your information.

Our key security measures include:

- Strict access controls and multi-factor authentication (MFA) to ensure only authorized personnel can access sensitive data.
- Encryption of data both at rest and in transit to protect it from being intercepted.
- Secure system configuration and timely patching to defend against known vulnerabilities.
- Regular data backups and restore testing to ensure data integrity and availability.
- Continuous monitoring of our systems to detect, prevent, and respond to potential security threats.

Our security commitments also extend to your interactions with our online platforms.

9. Cookies and Online Tracking

Our website and online services use cookies to function effectively. We distinguish between cookies that are essential for service provision and those used for non-essential purposes like analytics or marketing.

Essential cookies are necessary for our platforms to work correctly. For analytics and marketing cookies, we will only use them with your explicit consent where required by law. For detailed information on the types of cookies we use and to manage your preferences, please consult our separate "Cookie Notice."

10. Policy Updates and Further Information

Aligned is dedicated to maintaining transparency with our clients. This Privacy Policy will be reviewed and updated as necessary to reflect changes in our data processing activities or evolving legal and regulatory requirements.

The latest version of this policy will always be available on our company website.

For any questions about our data protection practices or to exercise your rights as detailed in this policy, please contact our Data Protection Officer (DPO).