

GDPR Privacy Notice

INTRODUCTION

This privacy notice describes how Greenwood Resources, Inc. (and any subsidiary, affiliate and any fund entity managed by Greenwood Resources) ('we', 'us') collects and processes personal information about you, how we use and protect this information, and your rights in relation to this information.

This privacy notice applies to all personal information we collect or process about you. Personal information is information, or a combination of pieces of information that could reasonably allow you to be identified.

1. PERSONAL INFORMATION WE USE

We may collect, use, store and transfer personal information about you from a variety of sources, including information we collect from you directly, and information we collect about you from other sources described below:

- Information from publicly available sources, such as land registers, tax authorities, trade registries or social media platforms or from third parties, most commonly where we need to conduct background checks about you;
- Information you provide to us when you contact us or communicate with us;
- Information that you provide when you enter into a contract with us, for example, a timberland purchase, sale or lease agreement;
- Information you provide in the course of arranging recreational access to our properties; and
- Information about you provided to us by your company or an intermediary or information from other companies in our group.

Note that we may be required by law to collect certain personal information about you, or as a consequence of any contractual relationship we have with you. Failure to provide this information may prevent or delay the fulfilment of these obligations. We will inform you at the time your information is collected whether certain data is compulsory and the consequences of the failure to provide such data.

The categories of information that we collect about you include:

- personal details (e.g. name, date of birth, country of domicile and/or your nationality, tax identification number and your passport number or national identity card details);
- contact details (e.g. phone number, email address, postal or business address);
- financial information (e.g. bankruptcy and solvency information for potential buyers); and
- any other information to help assess your suitability as a contracting party with us (e.g. your forestry experience, your experience in the service that you are offering, money laundering risk, bribery and corruption risk, your connections to politically exposed persons).

Some of the categories of information that we collect are special categories of personal data (also known as sensitive personal information). In particular, we may process personal information that relates to your criminal history for the purposes of ascertaining your suitability as a contracting party, if authorized or permitted by law.

2. HOW WE USE YOUR PERSONAL INFORMATION AND THE BASIS ON WHICH WE USE IT

We use your personal information to:

- manage your relationship or contract with us and to deal with your enquiries and requests;

- comply with legal obligations to which we are subject and cooperate with regulators and law enforcement bodies; and
- contact you with opportunities (e.g. to rent, buy or sell land or opportunities in connection with agricultural business). If you do not wish to be contacted with these opportunities, please contact us (using the details at the end of this privacy notice) and let us know.

We must have a legal basis to process your personal information. In most cases the legal basis will be one of the following:

- the administration and management of our business, including the establishment of or defense against legal claims, the prevention and investigation of criminal offences, maintenance of security for our information technology systems or management and further development of our business operations including risk management, recovering money you owe to us, analyzing performance and archiving;
- to fulfill our contractual obligations to you, for example as landlord, and to ensure that invoices are processed and paid correctly. Failure to provide this information may prevent or delay the fulfilment of these contractual obligations.
- to fulfill our contractual obligations to you in connection with your engagement with us, for example your contact details and bank account details. Failure to provide this information may prevent or delay the fulfilment of these contractual obligations.
- to comply with our legal obligations, for example mandatory disclosure of personal data to (tax) authorities or as required for audit purposes, keeping of records obligations, preparing and keeping financial accounting documents and, in certain cases, the obligation to know your customer by obtaining proof of your identity to enable us to meet our anti-money laundering obligations.
- to comply with our legal obligations to you, for example any health and safety obligations while you are on our premises, or to a third party (e.g. the taxation authorities).

We may obtain your consent to collect and use certain types of personal information when we are required to do so by law. If we ask for your consent to process your personal information, we will do so by providing you with reasonable notice ensuring that your consent is granted on an informed basis. Where you have provided consent for our processing of your personal data, you may withdraw your consent at any time by contacting us using the details at the end of this privacy notice. We will cease processing your personal data as soon as reasonably possible, unless legally required otherwise.

3. YOUR RIGHTS OVER YOUR PERSONAL INFORMATION

You have certain rights regarding your personal information, subject to local law. These include the following rights to:

- access your personal information
- rectify the information we hold about you
- erase your personal information
- restrict our use of your personal information
- object to our use of your personal information
- receive your personal information in a usable electronic format and transmit it to a third party (right to data portability)
- lodge a complaint with your local data protection authority.

If you would like to discuss or exercise such rights, please contact us at the details below. We encourage you to contact us to update or correct your information if it changes or if the personal information we hold about you is inaccurate.

We will contact you if we need additional information from you in order to honor your requests.

4. INFORMATION SHARING

We may share or transfer your personal information with third parties under the following circumstances:

- Service providers, business partners, agents and advisors (including lawyers, accountants, IT or public relations advisers). We may share your personal information with our service providers, business partners, agents and advisors to obtain their advice or assistance or who perform business operations or marketing services for us. We may also share your personal information with your agents, advisers, intermediaries, and representatives who you tell us about
- TIAA group companies. Greenwood Resources is owned by Nuveen, a TIAA Company, so we work closely with other businesses and companies that fall under the TIAA group family. We may share certain background and performance information about you with TIAA and other TIAA group companies involved in agricultural asset management for internal reporting. For information concerning companies within TIAA Group with access to your personal information and the purpose of such sharing please contact us using the details below.
- Law enforcement agency, court, regulator, government authority, legal advisors or other third party. We may share your personal information with these parties where we believe this is necessary to comply with a legal or regulatory obligation, or otherwise to protect our rights or the rights of any third party (e.g. advisers where it is necessary for us to obtain their advice or assistance, our auditors where it is necessary as part of their auditing functions, with third parties who assist us in conducting background checks, relevant regulators or law enforcement agencies where we are required to do so).
- Asset purchasers. We may share your personal information with any third party that purchases, or to which we transfer, all or substantially all of our assets and business. Should such a sale or transfer occur, we will use reasonable efforts to try to ensure that the entity to which we transfer your personal information uses it in a manner that is consistent with this privacy notice. Because we operate as part of a global business, the recipients referred to above may be located outside the jurisdiction in which you are located (or in which we provide the services). See the section on "International Data Transfer" below for more information.

5. INFORMATION SECURITY AND STORAGE

We implement technical and organizational measures to ensure a level of security appropriate to the risk to the personal information we process. These measures are aimed at ensuring the on-going integrity and confidentiality of personal information. We evaluate these measures on a regular basis to ensure the security of the processing.

We will keep your personal information for as long as we have a relationship with you, and for a period of up to 7 years thereafter. We will only retain your personal information after this time if we are required to do so to comply with the law, or if there are outstanding claims or complaints that will reasonably require your personal information to be retained.

6. INTERNATIONAL DATA TRANSFER

Your personal information may be transferred to, stored, and processed in a country that is not regarded as ensuring an adequate level of protection for personal information by the European Commission, provided that at least one of the following applies:

- the country that we send the personal data to is approved by the European Commission as providing an adequate level of protection for personal data;
- the transfer is to a recipient in the United States of America who has registered under the EU/US Privacy Shield;
- the recipient has entered into European Commission standard contractual clauses with us; or
- you have explicitly consented to the same.

For more information on international transfer of data, including appropriate safeguards in place, please contact us at the details below.

7. CONTACT US

Greenwood Resources, Inc. or Greenwood Resources Poland Sp. Z.o.o. (as appropriate) is the controller responsible for the personal information we collect and process.

If you have questions or concerns regarding the way in which your personal information has been used, please contact [us](#) by clicking the Contact Us link at the bottom of the page.

We are committed to working with you to obtain a fair resolution of any complaint or concern about privacy. If, however, you believe that we have not been able to assist with your complaint or concern, you have the right to make a complaint to the data protection authority in the UK (ico.org.uk/make-a-complaint), Romania (http://www.dataprotection.ro/?page=Plangeri_RGPD&lang=ro), Poland (kancelaria@giodo.gov.pl), or the equivalent authority in the relevant country in which we operate.

8. CHANGES TO THE POLICY

You may request a copy of this privacy notice from us using the contact details from our website. We may need to modify or update this privacy notice from time to time. When we do so, we will post those changes on our website so you can always have access to details about the information we collect, how we use it, and under what circumstances, if any, we disclose it. Any such change, material or otherwise, shall enter into force with immediate effect at the publishing date on our Site.

Where changes to this privacy notice will have a fundamental impact on the nature of the processing or otherwise have a substantial impact on you, we will give you sufficient advance notice so that you have the opportunity to exercise your rights (e.g. to object to the processing).