

Global Privacy and Cookie Notice

Global Privacy and Cookie Notice

Last updated: 2 December 2024

Please Read Carefully.

CBRE, Inc., together with its subsidiaries (collectively, “**CBRE Group**”), recognizes the importance of protecting your privacy. This Global Privacy and Cookie Notice (“**Notice**”) is intended to assist you in understanding CBRE Group’s data collection and handling practices and in making informed decisions and exercising your data privacy rights under applicable law when you:

- Use CBRE Group’s public websites and other services to which this Notice is attached (collectively, the Site) or
- Interact professionally with CBRE Group, including through CBRE Group-operated social media accounts, and are not otherwise provided with a different privacy notice at the point of interaction (collectively, “**Professional Interactions**”).

The CBRE websites that comprise the Site may post a local, country-specific privacy and cookie notice alongside this Notice which supplements or modifies this Notice as necessary to comply with applicable law (“**Local Notices**”).

Table of Contents

[Summary of Key Information](#)

[Full Notice](#)

- [Information on the Applicable Responsible Entity](#)
- [Global Privacy Notice](#)
 - [Your Acceptance Through Use](#)
 - [Personal Information We Collect and Sources](#)
 - [How We Use Your Information and Legal Bases](#)
 - [Sharing of Your Personal Information](#)
 - [International Data Transfers](#)
 - [How We Secure Your Personal Information](#)
 - [How Long We Keep Your Personal Information](#)
 - [Your Privacy Rights](#)
 - [Changes to this Policy](#)
 - [EU and UK Representative Under GDPR](#)
 - [Data Protection Officers](#)
 - [California Privacy Policy](#)
 - [Cookie Policy – Automatic Data Collection](#)
 - [Contact Us](#)

SUMMARY OF KEY INFORMATION

Responsible Entity	Depending on how and for what reason we collect your personal information through this Site or your Professional Interactions, the CBRE entities
---------------------------	--

	<p>responsible for processing your personal information (also known in some jurisdictions as data controller) may differ. Please find information on how to identify your applicable responsible CBRE entity(ies) in Appendix 1. Click here to learn more.</p>
Acceptance Through Use	<p>To the extent permitted by applicable law, your use of this Site or engagement in Professional Interactions with us signifies your understanding and acceptance of the terms of this Notice. Click here to learn more.</p>
Personal Information We Collect and Sources	<p>We collect personal information about your use of the Site and Professional Interactions with CBRE such as Contact Information, Registration Information (such as username/password), Professional Information (such as job title, industry, employer), Business Relationship Information (such as your primary CBRE Group contacts), Social Media Information and Cookie, Device and Web Analytics Information. We collect this personal information directly from you, from other CBRE employees, and from third parties. Click here to learn more.</p>
Use and Legal Bases	<p>We use your personal information to make the Site accessible to you, to communicate with you, to interact professionally with and provide marketing to you, and to improve our and to fulfill other commercial or business-related purposes. We primarily rely on the overriding business interests of CBRE or your consent (if required by law) to process your personal information. Click here to learn more.</p>
Data Sharing	<p>The CBRE Group is a global firm and the personal information we collect or you provide may be shared and processed as necessary with other CBRE entities, including those better suited to respond to your request and to provide you with access to the Site. We may also share your personal information with third-parties such as service providers who assist us with IT and data</p>

	hosting, marketing, and legal and regulatory compliance) and with public authorities. Click here to learn more.
International Data Transfers	We may share your personal information with other CBRE entities and service providers located outside of your home country. When doing so, we provide appropriate safeguards for international data transfers as required by applicable law. Click here to learn more.
Data Security	We implement appropriate technical and organizational security measures to safeguard the personal information we collect and process about you against loss and unauthorized alteration or disclosure. Click here to learn more.
Data Retention	We retain the personal information we collect about you for as long as necessary for the purpose for which that information was collected or as otherwise legally required. Click here to learn more.
Privacy Rights	Depending on the legal regulations in your country, you may have certain rights to request access, rectification, deletion, objection, or other actions regarding your personal information. See details below, including how to exercise any privacy rights you may have under applicable law. Click here to learn more.
Changes to this Notice	If we make any material changes to this Notice, we will make changes here and, if the changes are significant, we will provide a more prominent notice. Where required, we will obtain your consent. Click here to learn more.
EU/UK Representative	We have appointed a representative for the responsible CBRE entities located outside of the EEA and the UK that process your personal information subject to the EU General Data Protection Regulation and UK data protection law. The contact details are disclosed in this Notice. Click here to learn more.
Data Protection Officer	Where required by law, we have appointed a data

	protection officer whose contact details are disclosed in this Notice. Click here to learn more.
California Consumer Privacy Policy	Additional disclosures required under California law to be made to individuals who are residents of California, including relating to applicable privacy rights, are provided in CBRE's California Consumer Privacy Policy. Click here to learn more.
Cookies	We use cookies on our Site and our preference manager allows you to restrict our use of cookies other than Required Cookies. Click here to learn more.
Contact CBRE	You are always free to contact us if you have questions or concerns regarding this Notice, have a question or problem related to your use of the Site, our business-related interactions with you, or wish to exercise your rights or to exclude your personal information from our direct marketing purposes. Click here to learn more.

FULL NOTICE

Information on the Applicable Responsible Entity

Depending on the legal regulations in your country and the applicable laws to which you are subject (such as in the EU/EEA and UK), you may have the right to information on the CBRE entity responsible for processing your personal information (also known in some jurisdictions as data controller), which may differ depending on how and for what reason we collect your personal information through this Site or your professional interactions with the CBRE Group. Information on how to identify your applicable responsible CBRE entity(ies) in [Appendix 1](#). Each responsible CBRE entity collects your personal information directly from you, directly through your use of the Site or through certain third-party sources as identified in this Notice. The country where the responsible CBRE entity is located, such as the US for CBRE, Inc., may provide a level of data protection which is not equivalent to the level of data protection provided in your home country. More information on [International Data Transfers](#) of your personal information is below.

Whenever this Notice refers to “**CBRE**”, “**we**”, “**us**” or “**our**”, it refers to the applicable responsible CBRE entity defined in [Appendix 1](#) below.

1. Your Acceptance Through Use

This Global Privacy Notice describes how CBRE collects, uses and discloses certain personal information obtained through this Site, your interactions with us on social media, and other professional interactions with you. **Please note that, to the extent permitted by applicable law, your use of this Site signifies your understanding and acceptance of the terms of this Global Privacy Notice**

2. Personal Information We Collect and Sources

Depending on how you interact with CBRE, you may be a data subject as a user of our Site or as a business contact of CBRE having a professional interaction with CBRE, such as a supplier, client, client employee, consultant, or business partner.

a. Data Collection from You

Depending on your use of the Site and Professional Interactions with CBRE, we may collect and process the following types of personal information from you. See [Consequences of Not Providing Personal Information to Us](#) below for more detail on the consequences of not providing us with your personal information.

- **Contact Information:** such as your name, postal or e-mail address, and phone number
- **Registration Data:** such as such as [newsletter requests, event/seminar registrations, subscriptions, downloads, and username/passwords](#)
- **Job Applicant Data:** such as employment and educational history, relevant skills, professional certifications and affiliations, compensation history (where allowed by law) and any other information included in curriculum vitae/resumés, online professional profiles, and job applications, opinions of references you provide, willingness to relocate, and, where allowed by law: test and assessment results, information about your outside activities or family relationships that may give rise to a conflict of interest and, information about criminal offense, conviction, pending investigations and administrative sanctions.
- **Employee Onboarding Information:** such as information necessary to form an employment or contractual relationship with the applicant and for legal compliance (such as national ID card, residency permits, and visas demonstrating the Right to Work), to processing payroll and provide employee benefits (such as bank account information, tax withholding elections, and beneficiary

information), and disability or other data (where allowed by law) needed to provide workplace accommodations.

- **Professional Relationship Information:** such as business contact information, industry, job title or role, your primary CBRE Group contacts and record of interactions with CBRE Group, information you provide to us which assist us in serving the business relationship, such as the types of investments you are interested in, and information you provide about your personal life (excluding special categories of data)
- **Marketing Data:** such as your interests and preferences in our products and services.
- **Social Media Information** based on your interactions with CBRE-operated social media sites: such as your social media username, profile, and content of your interactions with, statements or opinions about CBRE or others in our industry, and aggregated usage reports.
- **Cookie, Device, and Web Analytics Data:** such as your Computer Internet Protocol (IP) address, geo-location data, browser settings and similar data about the use of the Site, mobile device advertising identifier, and cookies and other data linked to a device. For more information, see our [Cookie Notice](#).

b. Data Collection through Third Party Sources

To the extent permitted by applicable law, we may collect and process the following personal information about you from third party sources:

- **Contact Information:** such as your name, postal or e-mail address, and phone number. (The third parties who collect and share your Contact Information with us may include your employer, operators of property listing and other websites accessible from links within the Site, and other business partners. These third parties are independently responsible (also referred to as an independent data controller in some jurisdictions) for the collection and processing of your Contact Information for their own, independent purposes. We refer you to their privacy notices to understand their privacy practices and how to exercise any rights you may have).
- **Job Applicant Data:** such as employment and educational history, relevant skills, professional certifications and affiliations, compensation history (where allowed by law) and any other information included in curriculum vitae/resumés, online professional profiles, and job applications and, where allowed by law: test and assessment results, and information about criminal offense, conviction, pending investigations and administrative sanctions.
- **Marketing Data:** such as your interest and preference in products and services similar to those offered

by CBRE. (The third parties who collect and share your Marketing Data with us may include companies in the business of compiling and selling marketing data and other business partners to whom you have provided your personal information. The third parties who collect and share your Marketing Data with us are independently responsible (also referred to as an independent data controller in some jurisdictions) for the collecting and processing of your Marketing Data for their own, independent purposes. We refer you to their privacy notices to understand their privacy practices and how to exercise any rights you may have).

- **Social Media Information** based on your interactions with third-party social media sites (including CBRE's accounts on such third party sites) such as: your social media username, profile, and content of your interactions with, statements or opinions about CBRE or others in our industry, and aggregated reports about your interactions with CBRE's social media accounts.
- **Third Party Advertisement Technical Data** from advertisements we place on third party websites: such as your IP address, browser type and version, device identifiers, location and time zone setting
- **Contact Information** we collect from third parties such as your employer or other professional referrals: such as your name, postal or e-mail address, and phone number.

c. Consequences of Not Providing Personal Information to Us

There is no statutory or contractual obligation requiring you to provide your personal information to CBRE. The provision of your personal data is voluntary for you. You may choose not to provide your personal information to us, however, in this case, you may not be able to use our Sites and receive our services and/or to enable interaction with us. Also, the provision of your personal information may be necessary to allow us to perform a contract with you and/or to provide services to you. See the [Cookie Notice](#) below for more detail on how we use cookies and how to manage your cookie preferences

3. How We Use Your Information and Legal Bases

The purposes for which we use your personal information and the legal bases for such processing are as follows:

- **To Manage and Provide You Access to the Site**

We process your Cookie, Device and Web Analytics Data to manage and provide you with access to the Site. We process this personal information where necessary based on the overriding legitimate business interest of CBRE or other third parties to provide you or your employer with access to the Site which we maintain for marketing and other business purposes, or based on your consent (if required

by law).

— **To Communicate With You About Your Job Application and Determine Your Qualifications and Suitability for Open Positions**

We process your Cookie, Device and Web Analytics Data to manage and provide you with access to the Site. We process this personal information where necessary based on the overriding legitimate business interest of CBRE or other third parties to provide you or your employer with access to the Site which we maintain for marketing and other business purposes, or based on your consent (if required by law).

— **To Carry Out and Manage the Employee On-Boarding Process**

We process your Employee Onboarding Information to carry out and manage the employee onboarding process if we offer and you accept employment with us. We use process this personal information where necessary to form an employment or contractual relationship with you and transfer this information to your personnel file for record-keeping purposes. We process your personal information where necessary to comply with CBRE's legal obligations, including maintaining records, for pre-contractual purposes (e.g., to take steps at your request prior to entering into a potential employment relationship), for other overriding legitimate business interests of CBRE and/or based on your consent (if required by law).

— **To Transact Business and Maintain a Professional Relationship With You**

We process your Contact Information and Professional Relationship Information to transact business and maintain a professional relationship with you or your employer. We process this personal information where necessary to take steps prior to entering into a contract with you (at your request), for the overriding legitimate business interests of CBRE or other third parties, such as to provide such requested services to you or your employer, or based on your consent (if required by law).

— **To Provide Relevant Marketing to You**

We process your Contact Information, Registration Data, Marketing Data, and Third Party Advertisement Technical Data, and Cookie, Device, and Web Analytics Data to contact you about the services, offerings, events and newsletters in which you have expressed an interest or about similar offerings or services (including those of third parties such as business partners) and to better target our advertising and provide pertinent offers in which we think you would be interested. We process this personal information where necessary based on the overriding business interests of CBRE or other third parties (such as your employer or business partners) to keep you and our clients informed about our latest news, products and services and to better target our advertising to you, or based on your consent (if required by law).

— **To Maintain and Manage CBRE's Brand Reputation – Social Media**

We process your Social Media Information to maintain CBRE's brand reputation through our presence on CBRE-operated and third party social media sites, including through Professional Interactions with

you when you interact with our social-media channels. We process this personal information where necessary based on the overriding business interests of CBRE in maintaining and managing our brand reputation and based on your consent (if required by law).

— **To Operate, Evaluate and Improve Our Business**

We process your Marketing Data, Professional Relationship Information, and Cookie, Device and Web Analytics Data to operate, evaluate and improve our business (including developing new products and services; managing our communications; determining the effectiveness of and optimizing our advertising; analyzing our products, services, websites, mobile applications and any other digital assets; facilitating the functionality of our websites, and mobile applications and any other digital assets). We process this personal information where necessary based on the overriding legitimate business interests of CBRE to operate and improve our business and based on your consent (if required by law).

— **To Comply With Legal Obligations And Establish, Exercise or Defend Legal Claims**

To establish, exercise or defend our legal rights, to comply with lawful government requests for disclosure of personal information or otherwise to comply with legal obligations, we use any of the personal information we collect about you where legally permissible to do so. We process this personal information where necessary to comply with CBRE's legal obligations or based on the overriding legitimate business interests of CBRE to exercise and defend legal claims or based on your consent (if required by law).

If you object to us using information for these other uses you can email
PrivacyAdministrator@CBRE.com.

4. Sharing of Your Personal Information

Where we can do so lawfully under applicable law, the personal information we collect may be shared and processed with the following categories of recipients, some of whom may be located in a country that does not provide an adequate level of data privacy and protection rights as your home country, as necessary for the purposes identified above in [How We Use Your Information and Legal Bases](#), above. CBRE has in place appropriate safeguards regarding internal personal information sharing. See [International Data Transfers](#) below for more information.

— **Internally with Other CBRE Entities**

CBRE Group is a global firm and the personal information CBRE collects or you provide may be shared and processed with CBRE entities as necessary for the purposes identified in [How We Use Your Personal Information and Legal Bases](#), above. For example, we may share your personal information internally with:

- another CBRE entity better suited to respond to your request,
- a decision-maker employed by another CBRE entity, or
- site administrators employed by another CBRE entity (referred to as data processors in some jurisdictions) who process certain of your personal information to manage your access to, maintain, and improve the functionality of the Site.

The potentially relevant CBRE entities are identified in [Appendix 1](#).

— **With Third Parties**

The potentially relevant third parties include:

- **Service Providers** who assist us with IT, cyber security, and data hosting providers, marketing, advertising and communications agencies, cookie analytics providers, online advertisers, and providers of website testing / analytics services.
- **Third Party Cookie Providers** who may track your browsing activity on our Site using cookies to show you ads based on your interests when you browse the Web or use social media and for analytical purposes. More information on these cookies, including how to provide or revoke your consent, may be found in our [Cookie Notice](#) below.
- **Consultants and advisors** who assist us with legal, regulatory, and business operations activities, such as legal counsel, compliance consultants and business auditors.
- **Business partners in case of a merger or sale**, such as if CBRE is merged with another organization, or in the event of a transfer of our assets or operations.

— **Legally Compelled Disclosure**

It may be necessary to disclose your personal information to third parties, such as courts, litigants, governmental agencies, and/or regulatory authorities when required to do so by law or necessary in connection with legal proceedings or similar processes, for example, in response to a court order or a subpoena or other legal obligation, in response to legally-binding disclosure requests by public authorities, including to meet national security or law enforcement agency requirements, or in special cases when we have reason to believe that disclosing your personal information is necessary to identify, contact or bring legal action against someone who may be causing injury to or interference with (whether intentionally or unintentionally) our rights or property or to defend ourselves.

CBRE is committed not to disclose your personal information in response to a court order or a subpoena or other legal obligation originating outside your home country unless it is legally compelled

to do so. In particular, CBRE, Inc. has assessed and is of the view that neither it nor its US subsidiaries are not subject to, and personal information transferred to CBRE US cannot be targeted by, the US Foreign Intelligence Surveillance Act ("**FISA**") Section 702 since CBRE US does not qualify as a provider of electronic communication service, as defined in 18 U.S.C. § 2510, nor a provider of a remote computing service, as defined in 18 U.S.C. § 2711. As a result, US intelligence authorities cannot issue a data disclosure demand under FISA upon CBRE, Inc. or its US subsidiaries. In case CBRE receives nevertheless, at some point, data disclosure demands under FISA, we will publish a Transparency Report on cbre.com and our EEA websites (see our Schrems II statement). All personal data transferred by CBRE to the US is encrypted in transit.

5. International Data Transfers

— Processing In the US and Elsewhere

Depending on the CBRE entity that is the responsible CBRE entity (see [Appendix 1](#) below) and the recipients (see [Sharing of Personal Information](#) above), your personal information may be processed and hosted in countries other than the country in which the information was originally collected, including countries that may have less stringent data protection laws than the country in which you initially provided the information or in which your information was originally collected.

In case of international data transfers, we will protect your personal information as required by all applicable data protection laws.

If you are located in a non-US jurisdiction, the transfer of personal information to another country, in particular to CBRE, Inc. in the US, may be necessary to provide you with the requested information and/or to perform any requested service. To the extent permitted by law, your request for information and/or services also constitutes your consent for the cross-border transfer.

— EEA and UK to Non-EEA Data Transfers

With respect to international data transfers initiated by CBRE from the European Economic Area ("**EEA**") or UK to recipients in any non-EEA jurisdictions,

- some recipients are located in countries which are considered as providing for an adequate level of data protection under EU law (or UK law, as applicable). These transfers do not, therefore, require any additional safeguards under EU (or UK, as applicable) data protection law.
- other recipients are located in countries not providing an adequate level of data protection under EU or UK law, such as the U.S. and, where required by law, we have implemented appropriate safeguards, such as EU Standard Contractual Clauses, and/or are relying on binding corporate rules of the recipient or an appropriate derogation. Where applicable, we implement

supplementary technical and contractual safeguards. Under applicable law you may have the right to ask for further information on such appropriate safeguards (see [Contact Us](#) below).

As stated above (see [Legally Compelled Disclosures](#)), CBRE, Inc. has assessed and is of the view that US public authorities cannot issue a lawful disclosure demand for personal data under FISA 702 upon CBRE, Inc. or its US subsidiaries. All personal data transferred by CBRE to the US is encrypted in transit.

— Data Privacy Framework Program

The EU-U.S. Data Privacy Framework (“**EU-U.S. DPF**”), UK Extension to the EU-U.S. DPF (“**UK Extension**”), and Swiss-U.S. DPF (“**Swiss-U.S. DPF**”) were respectively developed by the U.S. Department of Commerce and the European Commission, UK Government, and Swiss Federal Administration to provide U.S. organizations with reliable mechanisms for personal data transfers to the United States from the European Union, United Kingdom, and Switzerland while ensuring data protection that is consistent with EU, UK, and Swiss law.. To learn more about the DPF, and to view our certification, please visit <https://www.dataprivacyframework.gov/s/participant-search>.

CBRE, Inc. complies with the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF as set forth by the U.S. Department of Commerce. CBRE, Inc. has certified to the U.S. Department of Commerce that it, and its U.S. entities described below (“**CBRE U.S.**”), adhere to the EU-U.S. Data Privacy Framework Principles (“**EU-U.S. DPF Principles**”) with regard to the processing of personal data received from the European Union in reliance on the EU-U.S. DPF and from the United Kingdom (and Gibraltar) in reliance on the UK Extension to the EU-U.S. DPF. CBRE U.S. has certified to the U.S. Department of Commerce that it adheres to the Swiss-U.S. Data Privacy Framework Principles (“**Swiss-U.S. DPF Principles**”) with regard to the processing of personal data received from Switzerland in reliance on the Swiss-U.S. DPF. If there is any conflict between the terms in this privacy policy and the EU-U.S. DPF Principles and/or the Swiss-U.S. DPF Principles, the Principles shall govern.

The following U.S. subsidiaries of CBRE, Inc. adhere to EU-U.S. DPF Principles and the Swiss-U.S. DPF Principles: CBRE Security Services, Inc; CBRE HMF, Inc.; CBRE Multifamily Capital Inc.; CBRE Capital Markets, Inc.; CBRE Technical Services, LLC; 13 PROPRIETARY & CONFIDENTIAL INFORMATION
©2023 CBRE, INC.

Trammell Crow Company, LLC; CBRE GWS of Puerto Rico, Inc.; CBRE Design Collective, Inc.; Millman Surveying, Inc.; CBRE GWS Licentia, LLC; CBRE Government Services, LLC; CBRE Securities, LLC; CBRE GWS Licentia, LLC; Full Spectrum Group, LLC; FacilitySource, LLC; CBRE GWS, LLC; Cascade Thermal Solutions, LLC; CBRE Managed Services Inc.; CBRE Management Services Inc.; and CBRE Investment Management Listed Real Assets LLC.

The Federal Trade Commission has jurisdiction over CBRE U.S. as it relates to compliance with the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF.

Additionally, this Notice adheres to the EU-U.S. DPF Principles with regard to personal data transferred from the European Union and the United Kingdom and the Swiss-U.S. DPF Principles with regard to personal data transferred from Switzerland.

01 Disclosure and Liability for Onward Transfer

CBRE is required to disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. CBRE may, as disclosed above in Sharing of Your Personal Information, transfer personal information onward to third parties. CBRE remains liable under the DPF Program if a third party processes such personal information in a manner inconsistent with the DPF Principles, unless we prove we are not responsible for the event giving rise to the damage.

02 Independent Recourse of DPF Complaints

In compliance with the EU-U.S. DPF, UK Extension to the EU-U.S. DPF, and Swiss-U.S. DPF, CBRE commits to resolve complaints about our collection or use of your personal information. EU, U.K., and Swiss individuals with inquiries or complaints regarding our DPF Program compliance should first contact CBRE at: Privacy.Office@cbre.com.

In the event of unresolved complaints or concerns, CBRE commits to cooperate with respective Data Protection Authorities (“**DPAs**”), including local EU DPAs (and empaneled DPAs) concerning disputes arising from EU individuals, with the UK Information Commissioner’s Office (ICO) and the Gibraltar Regulatory Authority (GRA) concerning disputes arising from UK (and Gibraltar individuals), and the Swiss Federal Data Protection and Information Commissioner (FDPIC) concerning disputes arising from Swiss individuals. CBRE will comply the advice provided by the respective authorities with regard to unresolved complaints concerning our handling of personal data processed in reliance on the EU-U.S. DPF, UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF.

If your complaint cannot be resolved through the channels discussed above, you have the possibility, under certain conditions, to invoke binding arbitration for complaints regarding DPF compliance. For additional information on binding arbitration, visit:

<https://www.dataprivacyframework.gov/s/article/ANNEX-I-introduction-dpf?tabset-35584=2>.

6. How We Secure Your Personal Information

We implement appropriate technical and organizational security measures to safeguard the personal information we collect and process about you against loss and unauthorized alteration or disclosure. The information you provide is encrypted in transit and at rest. We utilize role-based access controls to limit access to your personal information on a strict need-to-know basis consistent with the purposes for which we have collected such information. We utilize anti-malware and intrusion detection systems to guard against unauthorized access to our network, and we have an incident response plan in place to quickly respond to any suspected leak or breach of personal information.

Where we share your personal information with our service providers, we have assessed that their technical and organizational measures provide an appropriate level of security.

7. How Long We Keep Your Personal Information:

We will only retain the personal information we collect about you for as long as necessary for the purpose for which that information was collected, and to the extent permitted by applicable laws. We take steps to ensure that when we no longer need to use your personal information, we remove it from our systems and records and/or take steps to anonymize it so that you can no longer be identified from it (unless we need to keep your information to comply with legal or regulatory obligations to which we are subject).

8. Your Privacy Rights

a. Marketing Communications - Rights to Opt-out and to Object

When you register on our Site, we may ask you to select whether you would like to receive electronic communications from the CBRE Group such as offers, news, reports and other promotional communications. **You may withdraw your consent or opt-out of receiving such communications at any time by contacting the CBRE Group as described below or following the Opt-Out or unsubscribe instruction contained in the body of any marketing electronic communication from us.**

Additionally, where we process your personal information for marketing purposes relying on our legitimate interests you will have the right to object to such processing at any time. Please be aware that where you object to this sort of processing it may affect our ability to carry out tasks as listed in this Notice.

b. Contact Details – Marketing Communications

Irrespective of the CBRE entity that is responsible for the processing of your personal data and the marketing communication, you may contact us centrally as stated below and we will ensure that the responsible CBRE entity receives your request relating to marketing communication and implements it promptly:

(i) **by sending an e-mail** at PrivacyAdministrator@cbre.com, including a copy of the e-mail you have received and by typing “Remove” in the subject line of your e-mail

— If you are located in **Europe, the Middle East or Africa**, you may also e-mail us at EMEA.PrivacyAdministrator@cbre.com, including a copy of the e-mail you have received and by typing “Remove” in the subject line of your e-mail

— If you are located in **Asia**, you may also e-mail us at PrivacyAdministratorAPAC@cbre.com, including a copy of the e-mail you have received and by typing “Remove” in the subject line of your e-mail

— If you are located in **Australia or New Zealand** you may also e-mail us at PrivacyAust@cbre.com.au, including a copy of the e-mail you have received and by typing “Remove” in the subject line of your e-mail

(ii) **by telephone**, at +1 877 227 3330 or **by facsimile**, at +1 212 618 7085

(iii) **by mail**, at CBRE, Inc., 321 North Clark Street, Suite 3400, Chicago, Illinois 60654, Attention: Global Director, Data Privacy

Your election not to receive newsletters or promotional and marketing correspondence may not affect other processing activities that would still be permitted under applicable law, such as providing you with transactional communication.

c. Requesting Access to Your Personal Information and Other Rights

Depending on the legal regulations in your country and the applicable laws to which you are subject, you may have all or some of the following rights set out below and may submit a request(s) to exercise any such rights through our [Data Subject Rights Portal](#) or by contacting us at dsr@cbre.com.

Irrespective of the CBRE entity that is responsible for the processing of your personal information, you may use such centralized contact details and CBRE will ensure that the responsible CBRE entity

receives your request and addresses it promptly as required by applicable law. CBRE will respond to your request comprehensively, even if you do not identify the particular CBRE entity against whom you make the request.

- **Right of access:** You may have the right to obtain from CBRE confirmation as to whether your personal information is being processed, and, where that is the case, to request access to your personal information. You may have the right to obtain a copy of your personal information undergoing processing. For additional copies requested by you, CBRE may charge a reasonable fee based on administrative costs.
- **Right to rectification:** You may have the right to obtain from CBRE the rectification of inaccurate personal information concerning you.
- **Right to erasure (right to be forgotten):** You may have the right to ask us to erase your personal information, in which case CBRE has to comply.
- **Right to restriction of processing:** You may have the right to request the restriction of processing your personal information.
- **Right to data portability:** You may have the right to receive your personal information which you have provided to CBRE in a structured, commonly used and machine-readable format and you may have the right to transmit those personal information to another entity without hindrance.
- **Right to withdraw consent:** If you have declared your consent for any personal information processing activities, you have the right to withdraw this consent at any time with future effect. Such a withdrawal will not affect the lawfulness of the processing prior to the consent withdrawal. This right to withdraw consent applies in particular to consents given for marketing and profiling purposes, if any.
- **Right to object:** Under certain circumstances, you may have the right to object, on grounds relating to your particular situation, at any time to the processing of your personal information by CBRE, and CBRE can be required to no longer process your personal information unless CBRE demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims. The right to object may, in particular, not exist if the processing of your personal information is necessary to take steps prior to entering into a contract or to perform a contract already concluded.
- **Right to information on the possibility to withhold consent** and information on the consequences of doing so.
- **Right to information on third parties with whom we have shared your data.**

— **Right to lodge a complaint with the competent data protection authority** in your home country or in the country in which the responsible CBRE entity is located, in particular with respect to the result of automated decision-making. A list of European Union Data Protection Authorities is available from the European Data Protection Board. In Brazil, the competent data protection authority is the Autoridade Nacional de Proteção de Dados (ANPD).

d. Brazil

In addition to other rights provided under applicable law, with respect to personal information collected and processed within Brazil, you may have the **right to request review of decisions taken solely based on the automated processing of personal data** which affects your interests, including decisions aimed at defining their personal, professional, consumption and credit profiles or aspects of their personality.

e. China

In addition to other rights provided under applicable law, with respect to personal information collected and processed within China, you may have a **right to deregister** as a user of an application and cancel online accounts.

9. Changes to this Notice

We are a rapidly evolving, global business. We will continue to assess this Notice against new technologies and services, business practices as well as our clients' needs, and make changes to this Notice from time to time as required. If we make any material changes to this Notice, we will make changes here and, if the changes are significant, we will provide a more prominent notice (including, for certain services, email notification of Notice changes). Where required, we will obtain your consent.

10. EU and UK Representative under GDPR

We have appointed a representative for the responsible CBRE entities located outside of the EEA and UK that process your personal information subject to the EU General Data Protection Regulation and UK data protection law. The representatives contact details are the following:

Representative in the EU (Art. 27 GDPR)	CBRE Advisory (IRL), Limited Connaught House, One Burlington Road Dublin 4 D04 C5Y6 In case of questions, please contact
---	---

	EUGDPRRepresentative@cbre.com .
Representative in the UK (Art. 27 of the UK GDPR)	CBRE Limited, Henrietta House; Henrietta Place; London; W1G 0NB In case of questions, please contact UKGDPRRepresentative@cbre.com .

11. Data Protection Officers

We have appointed, in accordance with local law, data protection officers (“**DPOs**”) for our subsidiaries in Germany, France, the EU (other than Germany, France and Romania), the UK, Australia, New Zealand, Brazil, Canada, the Dubai International Finance Center, Korea, the Philippines, and Vietnam. If you have any questions or concerns about our personal data policies or practices, you may contact the appropriate DPO using the following contact details:

GDPR and UK GDPR

Germany: CBRE GmbH, CBRE PREUSS VALTEQ GmbH, and CBRE Capital Advisors GmbH	datenschutzbeauftragter@cbre.com
Germany: CBRE Global Investors Germany GmbH	helpdesk@dsextern.de
Germany: CBRE GWS Industrial Services GmbH and CBRE GWS IFM Industrie GmbH	GWSGermanyDPO@cbre.com
France	compliance@cbre.fr
UK	EMEAPrivacyDirector@cbre.com
EU (other than France, Germany and Romania)	EMEAPrivacyDirector@cbre.com
Romania	Madalina.opera@cbre.com

Brazil LGPD

Brazil	BrazilDPO@cbre.com
--------	--

Canada

CBRE Limited	CanadaDPO@cbre.com
--------------	--

Dubai International Finance Center Data Protection Law DIFC No. 5 (2020)

Dubai International Financial Center: CBRE (DIFC) Limited	EMEAPrivacyDirector@cbre.com
--	--

Korea Personal Information Protection Act

Korea	KoreaDPO@cbrekorea.com
-------	--

Philippines Republic Act No. 10173

Philippines	phdpo@cbre.com
-------------	--

Singapore Personal Data Protection Act of 2012

Singapore	DPO@cbre.com.sg
-----------	--

Thailand (Personal Data Protection Act B.E. 2562 (2019))

Thailand	APACPrivacyHelpline@cbre.com
----------	--

Vietnam Decree No. 13/2023/ND-CP on Personal Data Protection

Vietnam	VietnamDPO@cbre.com
---------	--

12. California Privacy Policy

If you are a resident of the State of California (“**Consumer**”), CBRE’s [California Privacy Policy](#) (“**California Policy**”) supplements the information provided in this Notice and includes information

about your privacy rights and how to exercise them. The California Policy applies solely to personal information we have collected from individuals who are residents of the State of California in the twelve (12) months preceding the date on which the California Policy was last updated.

CBRE does not sell nor share Personal Information or Sensitive Personal Information as defined under applicable California law.

Depending on how you interact with CBRE as a user of our Site or as a business contact of CBRE having a professional interaction with CBRE, such as a supplier, client, client employee, consultant, or business partner, we may collect certain personal information.

- **Identifiers** such as a real name, alias, postal address, email address, phone number, usernames and passwords.
- **Professional or employment-related information**, including employment and educational history, relevant skills, professional certifications and affiliations, compensation history (where allowed by law) and any other information included in curriculum vitae/resumés, online professional profiles, and job applications, opinions of references you provide, willingness to relocate, and, where allowed by law: test and assessment results, information about your outside activities or family relationships that may give rise to a conflict of interest and, information about criminal offense, conviction, pending investigations and administrative sanctions. This also includes information necessary to form an employment or contractual relationship with the applicant and for legal compliance (such as national ID card, residency permits, and visas demonstrating the Right to Work), to processing payroll and provide employee benefits (such as bank account information, tax withholding elections, and beneficiary information), and disability or other data (where allowed by law) needed to provide workplace accommodations
- **Internet or other electronic network activity information**, including social media username, profile, and content of your interactions with, statements or opinions about CBRE or others in our industry, and aggregated usage reports. This also includes Computer Internet Protocol (IP) address, geo-location data, browser settings and similar data about the use of the Site, mobile device advertising identifier, browser type and version, device identifiers, location and time zone setting, and cookies and other data linked to a device.
- **Commercial information** such as newsletter requests, event/seminar registrations, subscriptions, file downloads, interests and preferences in our products and services, and your interest and preference in products and services similar to those offered by CBRE. This also includes business contact information, industry, job title or role, your primary CBRE Group contacts and record of interactions with CBRE Group, information you provide to us which assist us in serving the

business relationship, such as the types of investments you are interested in, and information you provide about your personal life (excluding special categories of data).

CBRE uses this information to achieve purposes outlined in the [How We Use Your Information and Legal Bases](#) section above.

CBRE does not sell nor share Personal Information or Sensitive Personal Information as defined under applicable California law

13. Cookie Notice – Automatic Data Collection

We use cookies and similar technologies on our Site and our cookie preference center allows you to restrict our use of cookies other than Required Cookies.

a. What is a Cookie

A cookie is a small text file that a website stores on your personal computer, telephone or any other device, with information about your navigation on that website. Cookies serve various purposes such as allowing you to navigate between pages efficiently, remembering your preferences, analyzing the use of our Site, generally improving the user experience, and ensuring that the advertisements you see online are more relevant to you and your interests. A cookie contains the name of the server it came from, the expiry of the cookie, a value – usually a randomly generated unique number as well as other data relating to your use of our Site. Depending on the applicable data protection law such information and data may qualify as personal information.

b. Cookies Used by Us

(i) How We Use Cookies

We use session cookies, which are temporary cookies that are erased from your device's memory when you close your Internet browser or turn your computer off, and persistent cookies, which are stored on your device until they expire, unless you delete them before that time. We group cookies on our site into three categories.

— *Required cookies:* These cookies are necessary to enable the basic features of this Site to function, such as identifying you as a valid user, ensuring that no one else can sign on simultaneously with your account from another computer and helping us serve you better based

on your registration preferences. These cookies may also be used to remember and honor your cookie preferences via our cookie preference center.

- *Functional cookies:* These cookies allow us to analyze your use of the Site to evaluate and improve our performance. They may also be used to provide a better customer experience on this Site. For example, providing us information about how our Site is used and helping us facilitate any promotions or surveys that we provide.
- *Advertising cookies:* These cookies may be used to share data with advertisers so that the ads you see on our Site or on third party websites are more relevant to you, allow you to share certain pages with social networks, or allow you to post comments on our Site.

(ii) Type of Cookies We Use

Details on the cookies used on our Site are provided in the cookie preference center available via the link "Cookie Preferences" on the button of our Site. Please click on "Detailed Settings" in the sections on functional cookies and advertising cookies.

c. Consent Requirements

Depending on the applicable data protection law, we may only place and use functional cookies and advertising cookies if you have given your consent via our cookie banner. Our cookie preference center on our Site allows you to make further choices and/or withdraw a consent regarding our use of cookies (with the exception of Required Cookies).

d. Performance Tracking via Similar Tracking Technologies

We sometimes use performance tracking technologies, such as web beacons, pixel and tags, within our marketing emails or within advertisements displayed on our Site or third party websites. These performance tracking technologies may be provided by us or by third parties and they help us to track whether an email recipient has completed an event, such as signing up for a free trial for example, or a user has clicked on advertisement. Further information on the performance tracking technologies used in our marketing emails and on our Site or third party websites are available via the link "Cookie Preferences" on the button of our Site. Please click on "Detailed Settings" in the sections on functional cookies and advertising cookies.

e. Managing Your Cookie Preferences

(i) Cookie Preference Center

Our cookie preference center on our Site allows you to make choices regarding our use of cookies (with the exception of Required Cookies). If you use our cookie preference center on a mobile device, we process your device's advertising identifier to honor your choices via our cookie preference center. If you make choices in our cookie preference center for cookies (e.g., if you reject a certain cookie), persistent cookies will be set by the ad networks listed in our cookie preference center to honor your preferences.

If you clear your cookies in your browser settings, this will remove all cookies including the opt-out cookies set to honor your choices made in our cookie preference center. You will need to re-access the cookie preference center to reset your preferences. Additionally, if you are located in the EEA or Brazil, you will also be presented with the cookie banner on the Site to re-consent to cookies where required.

(ii) Do Not Track

We currently do not respond to "Do Not Track" signals from your browser. Our use of tracking technologies may instead be controlled through our cookie preference center.

(iii) Disabling and Preventing Further Use of Cookies

In addition to restricting cookies in our cookie preference center, you may restrict, block or delete the cookies from this Site at any time by changing the configuration of your browser. You can find out how to do this, and find more information on cookies, at <https://www.allaboutcookies.org/>. In addition, while each browser has different settings and configurations, cookies settings can typically be adjusted in the "Preferences" or "Tools" menu of your browser. Your browser's "Help" menu may provide additional information. Note, however, that deleting or blocking Required Cookies will cause the Site to not function properly.

14. Contact Us

You are always free to contact us if you have questions or concerns regarding this Notice, have a question or problem related to your use of the Site, or wish to exclude your personal information from our direct marketing purposes. Our standard business practice is to retain any communications from our Site visitors to help us to serve each of you better.

You may contact us by emailing Privacy.Office@cbre.com or by writing to us at 321 North Clark Street,

We may contact you by email in relation to any questions and concerns you raise. If you prefer us to contact you in an alternative manner, please let us know and we will accommodate your request if possible and appropriate.

a. Visitors in Europe, the Middle East or Africa

If you are located in Europe, the Middle East or Africa, you may also e-mail us at EMEAPrivacyDirector@cbre.com or write to us at Henrietta House, Henrietta Pl, London W1G 0NB, United Kingdom, Attention: EMEA Director, Data Privacy.

b. Visitors in Asia or the Pacific

If you are located in Asia or the Pacific, you may also e-mail us at APACPrivacyHelpline@cbre.com or write to us at 15/F M1 Tower, 141 H.V. Dela Costa Street, Salcedo Village, Makati City, Philippines 1227, Attention: APAC Senior Manager, Data Privacy.

Appendix 1

If it is unclear to you which CBRE entity is the responsible CBRE entity for the processing of your personal information, please contact Privacy.Office@cbre.com and we will help you identify the responsible CBRE entity.

	Processing Activity	Responsible CBRE Entity
A.	Processing personal information collected via the Site www.CBRE.com , including account information when registering on www.CBRE.com	CBRE, Inc. 2100 McKinney Avenue, Suite 1250 Dallas, TX 75201 Tel +1 214 979 6100
B.	Processing personal information collected via local CBRE Sites, including Registration Information	The CBRE entity or entities located in each country which operates the local CBRE Site (as identified in the link below) is generally responsible for the

	(with the exception of certain processing activities described in C. below)	<p>processing of your personal information, unless otherwise provided in Local Notices on the respective local CBRE Sites.</p> <p>To the extent that several CBRE entities acting as joint controllers are the responsible entities for the processing of your personal data (as identified in the link below), you can exercise your rights under applicable data protection law vis-à-vis all those CBRE entities and you can request a copy containing the essence of the joint controller arrangement by contacting privacy.office@cbre.com.</p> <p>Please review the information in this link.</p>
C.	Processing personal information collected via Professional Interactions with you other than via the Site.	<p>The CBRE entity with whom you have your Professional Interaction or that collects your personal data through third party resources (e.g. social media sites of competitors) is the responsible CBRE entity for the processing of your personal information, unless otherwise provided in Local Notices on the respective local CBRE Sites. Please review the information in this link.</p>
D.	Processing personal information collected via social media sites operated by CBRE.	<p>For social media sites operated by CBRE, the data controller is the CBRE entity identified on the social media site as operator of the social media site and/or as contact person.</p>