PRIVACY POLICY

1 Scope

1.1 Supermarket Income REIT plc is a FTSE 250 real estate company, incorporated in England and Wales, and dedicated to investing in supermarket property forming a key part of the future model of grocery within the UK and Europe.

1.2 This Privacy Policy explains how Supermarket Income REIT plc, its subsidiaries and its affiliates (together, the "**Company**", "**We**", "**Our**", "**Us**") each a controller, collect, use and protect your personal data when you interact with us, including in connection with share register services and administration and related services of the Company. We are committed to safeguarding the privacy and confidentiality of the personal data entrusted to us, and have implemented policies and controls to ensure the security of your personal data.

1.3 We keep our Privacy Policy under regular review. In the event that additional processing is required, we may update this Privacy Policy. This version was last updated on 3 December 2025.

1.4 This Privacy Policy is addressed to the following categories of data subjects:

(a) our shareholders;

(b) our beneficial owners;

(c) our directors;

(d) staff located at our affiliates; and

(e) our third-party supplier contacts.

1.5 The Company's website may contain links to other third-party websites that we do not control. Please note that their information handling practices may differ from ours. We recommend reviewing the privacy policies of any linked websites. We are not responsible for the content or practices of these external sites.

2 Where we get your data from

2.1 By providing your information to us, whether via our website, in person, in writing, via one of our service providers or over the phone we may collect your personal data, including:

(a) **Information you provide to the Company** ► personal data that you provide to the Company, such as when contacting us using the email or physical address(es) listed on our website, including your name, email address, bank account details (where required) and other contact details;

(b) **In relation to shareholders only, information relating to your shareholding** ► share register services are outsourced to registrars, which hold the majority of this personal data. We periodically receive reports listing the names and contact details of our shareholders;

(c) **KYC and due diligence information** ► information obtained by third-party screening providers and publicly available information and background screening, where required by law or applicable financial regulations;

(d) **Correspondence** ► if you contact us, we will typically keep a record of that correspondence. This may include telephone calls in relation to management of shareholdings, and you will be informed that any call is being recorded. If you object to this, you can end the call at that point and use an alternative method of communication should you prefer;

(e) **Device Information** ► when you interact with us, we will collect technical data such as information about your operating system, browser, software applications, geolocation, security status and other device information; and

(f) **Website and communication usage** ► details of your visits to our website and information collected through cookies and other tracking technologies including, but not limited to, your IP address and domain name, your browser version and operating system, traffic data, location data, web logs and other communication data, and the resources that you access.

3 Purposes for which we use your personal data

3.1 Below sets out all the ways we plan to use the various categories of your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Purpose / processing activity	**Type of data**	**Lawful basis**
To identify shareholders/beneficial owners and undertake reporting and analysis	Basic contact details (first name, last name, address, account designations and the amount of shares held)	**Legitimate interests** (to understand the demographic of our shareholders and/or beneficial owners and undertake reporting and analysis to assess this) **Legal obligations**
To maintain our share register and provide shareholding services to you	Basic contact details (first name, last name, email address, address, telephone number and bank account details) Recording data (telephone recordings) Technical data (account and login data)	**Legitimate interests** (for business administration including setting up and maintaining our register of members (including to receive and deal with transfers, probates, powers of attorney, change of address), prepare and issue share certificates, deal with telephone enquiries of shareholders, to maintain and update dividend and interest payment instructions and make payments, to deliver annual reports, accounts and interim reports, to assist with proxy voting and to

		enable shareholders to use online platforms to vote and manage their shareholdings) **Legal obligations** **Performance of a contract with you**
To deal with administrative requirements in respect of directors	Basic contact details (first name, last name, email address, phone number, address and bank account details)	**Legitimate interests** (for business administration including arranging for payment of directors' fees, dealing with director's queries, paying dividends, organising and taking minutes of all meetings, liaising with directors regarding meetings and board packs, assisting with arrangement of travel, accommodation and directors' requirements for board and committee meetings, maintaining and keeping a register of declared interests, advising directors and monitoring directors' interests and conflicts) **Legal obligations**
To deal with administrative and operational needs related to our employees	Basic contact details (first name, last name, email address, phone number, address and bank account details) Special category data (race, ethnic origin and health data) Criminal convictions data	**Performance of a contract with you** **Compliance with legal obligations** **Legitimate interests** (for business administration and improvement, including workforce planning and analytics, preventing fraud and misconduct, protecting company assets, managing access controls and conducting internal audits)

		Where special category data is collected, **employment, social security and social protection law** Where we process data relating to criminal convictions or offences (for example, as part of background checks where relevant to your role or required by law), we will only do so where permitted by UK law and where one of the specific conditions in the Data Protection Act 2018 Schedule 1 applies, such as employment, social security and social protection, preventing or detecting unlawful acts or regulatory requirements
To meet legal and regulatory requirements (including to comply with KYC, anti-money laundering and insider dealing requirements)	Basic contact details (first name, last name, email address, phone number, address and bank account details) KYC information as appropriate (criminal convictions, political opinions, religious beliefs, ethnicity)	**Legal obligations** **Legitimate interests** (for business administration) **Performance of a contract with you** Where special category data is collected, **substantial public interest** (preventing fraud and regulatory requirements) Where we process data relating to criminal convictions or offences (for example, as part of KYC checks), we will only do so where permitted by UK law and where one of the specific conditions in the Data Protection Act 2018 Schedule 1 applies, such as preventing or detecting unlawful acts or regulatory requirements

3.2 **General uses**

(a) We may also process your personal data where:

- we have legal obligations that we have to discharge;
- you have consented to such use; and/or
- to establish, exercise or defend our legal rights for the purposes of legal proceedings.

(b) If you do choose to provide your consent, you can withdraw it at any time by contacting us at the details provided in the Contact Us section below.

(c) We will keep this data only for as long as necessary depending on the purpose for which it was provided.

4 Sharing your personal data (and transfers outside of the EEA)

4.1 We will only use or disclose your personal data for the purpose(s) for which it was collected and as otherwise identified in this Privacy Policy.

4.2 **Sharing outside of the Company:** personal data may be provided to third parties, including our brokers, share registrars, administrators, legal advisers, auditors, financial advisors, regulatory authorities or other self-regulatory organisations (when required to satisfy the legal or regulatory requirements of governments), regulatory or law enforcement authorities (where required or in cases of suspected criminal activity or contravention of law), or to comply with a court order or for the protection of our assets. We ensure that such third parties are subject to data protection obligations and may only use your personal data as described in this Privacy Policy.

4.3 We may share your data with third parties if we sell, transfer or merge parts of our business or assets. In such cases, the new owners may use your personal data as described in this Privacy Policy.

4.4 **Transfers of personal data outside of the UK or the EEA:** Your personal data may be accessed by suppliers or other persons in, transferred to, and/or stored at, a destination outside the UK or the EEA. We will, in all circumstances, safeguard personal data as set out in this Privacy Policy.

4.5 Where we transfer personal data outside the EEA, the Company may be required to take specific additional measures to safeguard the relevant personal data. This may be done in one of the following ways:

(a) the country that we send the data to might be approved as offering an adequate level of protection for personal data;

(b) in other circumstances the law may permit us to otherwise transfer your personal data outside the UK or EEA; or

(c) an appropriate safeguard may be put in place such as the recipient signing up to a contract based on the ICO's international data transfer agreement or addendum, or the European Commission's Standard Contractual Clauses.

4.6 Please contact us at the email address provided in the Contact Us section below if you would like to see a copy of the specific safeguards applied to any export of your personal data.

5 Retention of your personal data

5.1 The Company's retention periods for personal data are based on business needs and legal requirements. The Company retains your personal data for as long as is necessary for the processing purpose(s) for which the information was collected. The Company may also retain certain personal data for the time period required to comply with legal and regulatory requirements regarding the retention of such data.

5.2 When personal data is no longer needed, the Company either irreversibly anonymises the data (and the Company may further retain and use the anonymised information) or securely destroys the data.

6 Safeguarding your personal data

6.1 The Company uses physical, electronic and procedural safeguards to protect against unauthorised use, access, modification, destruction, disclosure, loss or theft of your personal data in the Company's custody or control. We have procedures to handle suspected data breaches and will notify you and relevant regulators if required by law.

6.2 Employees, agents, contractors and third parties processing your data will do so under our instructions and are bound by confidentiality.

6.3 Internet data transmission is not completely secure. While we strive to protect your data (e.g., by encrypting outgoing emails), we cannot guarantee security during transmission to our website. Any transmission is at your own risk. Once we receive your data, we use procedures and safety features to prevent unauthorised access.

7 Your Rights

7.1 You may have the following rights:

(a) your right of access - you have the right to ask us for copies of your personal data. You can request other information such as where we get personal data from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. *You can read more about this right here;*

(b) your right to withdraw consent - when we use consent as our lawful basis you have the right to withdraw your consent to the processing of your personal data at any time. Please note, however, that we may still be entitled to process your personal data if we have another legitimate reason for doing so. For example, we may need to retain personal data to comply with a legal obligation. *You can read more about this right here*;

(c) your right to data portability - you have the right to ask that we transfer the personal information you gave us to another organisation, or to you. *You can read more about this right here*;

(d) your right to rectification – you have the right to request that we rectify or delete your personal data if it is inaccurate or incomplete. *You can read more about this right here*;

(e) your right to restriction of processing - you have the right to object to, or request that we restrict, our processing of your personal data in certain circumstances. Again, there may be circumstances where you object to, or ask us to restrict, our processing of your personal data but we are legally entitled to refuse that request. *You can read more about this right here*; and

(f) your right to object to processing - you have the right to object to the processing of your personal data. *You can read more about this right here*.

7.2 You can exercise your rights by contacting us using the details listed in the Contact Us section below.

7.3 In most cases, you can exercise your rights free of charge. We may charge a reasonable fee if your request is clearly unfounded, excessive, or if you request multiple copies of the information. In some cases, we may refuse to comply with such requests.

7.4 We aim to respond to all legitimate requests within one month. If your request is complex or you have made multiple requests, it may take longer. We will notify you and keep you updated in such cases.

7.5 We may request specific information to confirm your identity and your right to access the data. This ensures that personal data is not disclosed to unauthorised individuals. We may contact you for further information to expedite our response.

7.6 It is important that the personal data we hold about you is accurate and current. Please inform us, by contacting us, using the details listed in the Contact Us section below, of any changes to your personal data during your relationship with us, such as a new address or email.

7.7 If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details listed in the Contact Us section below.

7.8 If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

7.9 The ICO's address:

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

Helpline number: 0303 123 1113

Website: *https://www.ico.org.uk/make-a-complaint*

8 Contact Us

8.1 If you have any questions or concerns about how we use your personal data, please contact the Company at its registered office:

Supermarket Income REIT
Level 19, The Shard,
32 London Bridge Street, SE1 9SG