



# Aurora Website Privacy & Cookie Policy (Draft)

## Aurora – Privacy & Cookie Policy (EN)

**Last updated:** 20 January 2026

This Privacy & Cookie Policy explains how we collect and use personal data when you visit [aurora-amsterdam.nl](https://aurora-amsterdam.nl) (the “Website”) and when you contact the Aurora project team.

We process personal data in accordance with the **GDPR (General Data Protection Regulation)** and applicable Dutch laws (including the **Uitvoeringswet AVG** and Dutch cookie rules under the **Telecommunications Act / Telecommunicatiewet**).

This Website is intended for **B2B/commercial leasing** only. Please note that even in a B2B context we may still process **personal data of business contacts** (e.g., name, work email, phone number).

### 1. Introduction

We take the protection of your personal data seriously. This policy explains:

- which personal data we collect;
- why we collect it and the legal bases we rely on;
- with whom we share it (including the appointed real estate agency/marketing consultant);
- how long we retain your data;
- what rights you have; and
- which cookies and similar technologies we use and how you can manage your preferences.

### 2. Who is responsible for your data?

**Data Controller (Verwerkingsverantwoordelijke):**

**UBS Asset Management (Europe) S.A.**

Amstelplein 1, 18th Floor

1096 HA Amsterdam, The Netherlands

KvK-nummer: 84355743

**Email:** [info@aurora-amsterdam.nl](mailto:info@aurora-amsterdam.nl) or [privacy@aurora-amsterdam.nl](mailto:privacy@aurora-amsterdam.nl) (or UBS privacy mailbox that is appropriate for this project)

If you have questions about this policy or want to exercise your privacy rights, contact us via the email address above.

### 3. What personal data do we collect?

We may collect and process:

#### A) Data you provide to us

- Contact information: name, (business) email address, telephone number, company name, job title (if provided)
- Communication data: content of messages/questions/requests
- Commercial interest information: e.g., space requirements, preferred timing for viewings (if you provide this)

#### B) Data we collect automatically

- Website usage data: pages visited, clicks/interactions, time and date of visit
- Device and browser data: browser type, device type, language settings
- Technical data: IP address, referrer URL, security logs

#### C) Data collected via cookies/trackers (depending on your consent choices)

- Analytical data (Google Analytics 4 / GA4)
- Marketing/advertising data (Google Ads, LinkedIn Insight Tag)
- B2B lead generation/company recognition (Leadinfo – IP address processing and corporate matching)

### 4. How do we collect your personal data?

We collect personal data:

- when you fill out a contact form on the Website;
- when you email or call us;
- when you visit the Website (via server logs and—subject to consent—cookies and tags);
- when you interact with our advertising campaigns (subject to your cookie choices).

### 5. Why do we process your personal data?

We process personal data for the following purposes and legal bases:

Purpose	Legal basis	Data categories
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Responding to inquiries (brochure requests, availability, viewings)	Legitimate interest and/or steps prior to contract	Contact + communication data
Handling commercial leasing discussions	Steps prior to contract / contract performance (as applicable)	Contact + communication data
<b>Sharing form submissions with the appointed real estate agency/marketing consultant and storing in CRM to follow up</b>	Legitimate interest and/or steps prior to contract	Contact + communication data + preferences
Website security and fraud/abuse prevention	Legitimate interest	IP address, logs
Website analytics (GA4)	Consent (where required)	Usage/cookie data
Advertising measurement and remarketing (Google Ads / LinkedIn)	Consent	Marketing cookie/tag data
B2B lead generation/company recognition (Leadinfo)	Legitimate interest (IP-based recognition) and consent where cookies are used/required	IP address, company-level data, usage data

### **Important (marketing communications):**

We may contact you about **Aurora** in response to your inquiry and for follow-up regarding viewings, brochures and leasing discussions. If we would like to send broader marketing updates (e.g., newsletters), we will do so in line with applicable Dutch marketing rules and provide an opt-out/unsubscribe option where required.

## **6. Sharing your personal data**

We do not sell your personal data. We share it only when necessary for the purposes described in this policy.

### ***6.1 Mandatory clause – form submissions, agency/consultants, CRM and follow-up***

If you submit personal data via forms on the Website, you acknowledge that:

- 1. The data submitted via forms is shared with the appointed real estate agency working on behalf of the Aurora project.**
- 2. Your data will be entered into our CRM system (Customer Relationship Management).**

3. **The purpose of this sharing and CRM registration is to allow these authorised parties to contact you regarding the Aurora property, including:**
  - a. arranging **viewings**,
  - b. sending **brochures** and additional project information, and
  - c. supporting **commercial discussions and lease negotiations**.

## 6.2 Other recipients (examples)

We may also share personal data with:

- IT suppliers (website hosting, maintenance, security);
- analytics and advertising providers (only after consent, where required): **Google** and **LinkedIn**;
- lead generation provider: **Leadinfo** (B2B recognition);
- professional advisers (e.g., legal) where necessary; and
- authorities where required by law.

We ensure that parties processing data on our behalf are bound by appropriate contractual obligations (e.g., Data Processing Agreements where applicable).

## 7. International data transfers

Some providers involved in analytics and advertising may process data outside the European Economic Area (EEA). Where this happens, we apply appropriate safeguards under GDPR (e.g., Standard Contractual Clauses and/or other approved transfer mechanisms), and we implement additional measures when required.

## 8. How long do we keep your data?

We retain personal data only as long as necessary for the purposes described.

**B2B lead retention (your requirement):** We retain inquiry/lead data for **12 months** after last meaningful contact, unless we must retain it longer due to legal obligations or ongoing discussions.

Data type	Retention period
Contact form submissions / CRM inquiry record	<b>12 months</b> after last meaningful contact
Email correspondence	<b>12 months</b> after last meaningful contact
Security/server logs	Typically up to <b>90 days</b> (unless needed longer for incident investigation)

Analytics data (GA4)	Configurable (we aim to keep it no longer than necessary)
Cookie consent preference	Typically up to <b>12 months</b>

After the retention period expires, we delete or anonymise data securely.

## 9. Your rights under GDPR

You have the right to:

- access your personal data,
- correct your data,
- request deletion (where applicable),
- restrict processing,
- data portability (where applicable),
- object to processing based on legitimate interest,
- object to **direct marketing** (including related profiling), and
- withdraw consent at any time (for consent-based processing such as marketing/analytics cookies).

You also have the right to lodge a complaint with the Dutch supervisory authority: **Autoriteit Persoonsgegevens**.

To exercise your rights, contact us using the details in Section 2.

## 10. Security measures

We implement appropriate technical and organisational measures to protect personal data, such as:

- HTTPS encryption,
- access controls and role-based access to the CRM,
- logging/monitoring, updates and vulnerability management, and
- contractual controls and confidentiality obligations for authorised project partners.

## 11. Cookie Policy

### 11.1 What are cookies and similar technologies?

Cookies are small text files placed on your device. Similar technologies include pixels, scripts, tags and local storage. These help us operate the Website, analyse performance and (with consent) measure and improve marketing.

### 11.2 Cookie consent and your choices

On your first visit we show a cookie banner that allows you to accept, reject or set preferences per category. You can change your choices at any time via the cookie settings link (if implemented) or via your browser settings.

### 11.3 Cookie categories and tools used (placeholder table)

The exact cookie names and retention periods can vary by configuration and may change. Your cookie banner/cookie scanner should populate the final list.

Category	Tool/vendor	Purpose
Functional (necessary)	Consent/cookie preference storage; core website functions	Remember cookie choices; enable essential site functions
Analytical	<b>Google Analytics 4 (GA4)</b>	Measure website usage and improve Website
Analytical	<b>funda in business (traffic source / referrer)</b>	Understand incoming traffic sources (may be measured via referrer/UTM and/or analytics)
Marketing	<b>Google Ads (Search &amp; Display)</b>	Ad conversion measurement; campaign performance; <b>remarketing</b> (if enabled)
Marketing	<b>LinkedIn Insight Tag</b>	Conversion tracking; campaign measurement; <b>remarketing</b> (if enabled)
Marketing / lead generation	<b>Leadinfo</b>	B2B company recognition (IP address processing/corporate matching); lead generation support

### 11.4 Tool-specific notes

#### A) Google Analytics 4 (GA4) – Analytical

Used to understand how visitors use the Website (pages visited, engagement, traffic



sources) so we can improve the Website and communications. Activated only if you accept analytical cookies where required.

### **B) Google Ads (Search & Display) – Marketing**

Used to promote Aurora and measure which ads lead to actions (e.g., contact form submission, brochure request). If enabled and if you consent, we may also use **remarketing** so you may see Aurora ads after visiting our Website.

### **C) LinkedIn Insight Tag – Marketing**

Used for conversion tracking and campaign measurement on LinkedIn. If enabled and if you consent, we may use **remarketing** features to show Aurora ads to people who have visited the Website or interacted with our ads.

### **D) Leadinfo – B2B lead generation/company recognition**

Used to help identify organisations visiting the Website through **IP address processing and corporate matching**. Depending on configuration, Leadinfo may use cookies and/or cookieless recognition. Where cookies are used, we treat them under the applicable cookie consent rules.

## **11.5 Managing cookies in your browser**

You can delete cookies via your browser settings. Blocking all cookies may affect some functionality (such as saving your cookie preferences).

## **12. Links to other websites**

The Website may link to third-party websites. We are not responsible for their privacy practices.

## **13. Changes to this policy**

We may update this policy from time to time. The updated version will be posted on the Website with a new “Last updated” date.

## **14. Contact**

For privacy questions or requests, contact:

### **UBS Asset Management (Europe) S.A.**

Amstelplein 1, 18th Floor, 1096 HA Amsterdam

KvK-nummer: 84355743

**Email:** [info@aurora-amsterdam.nl](mailto:info@aurora-amsterdam.nl) or [privacy@aurora-amsterdam.nl](mailto:privacy@aurora-amsterdam.nl) (or UBS privacy mailbox that is appropriate for this project).