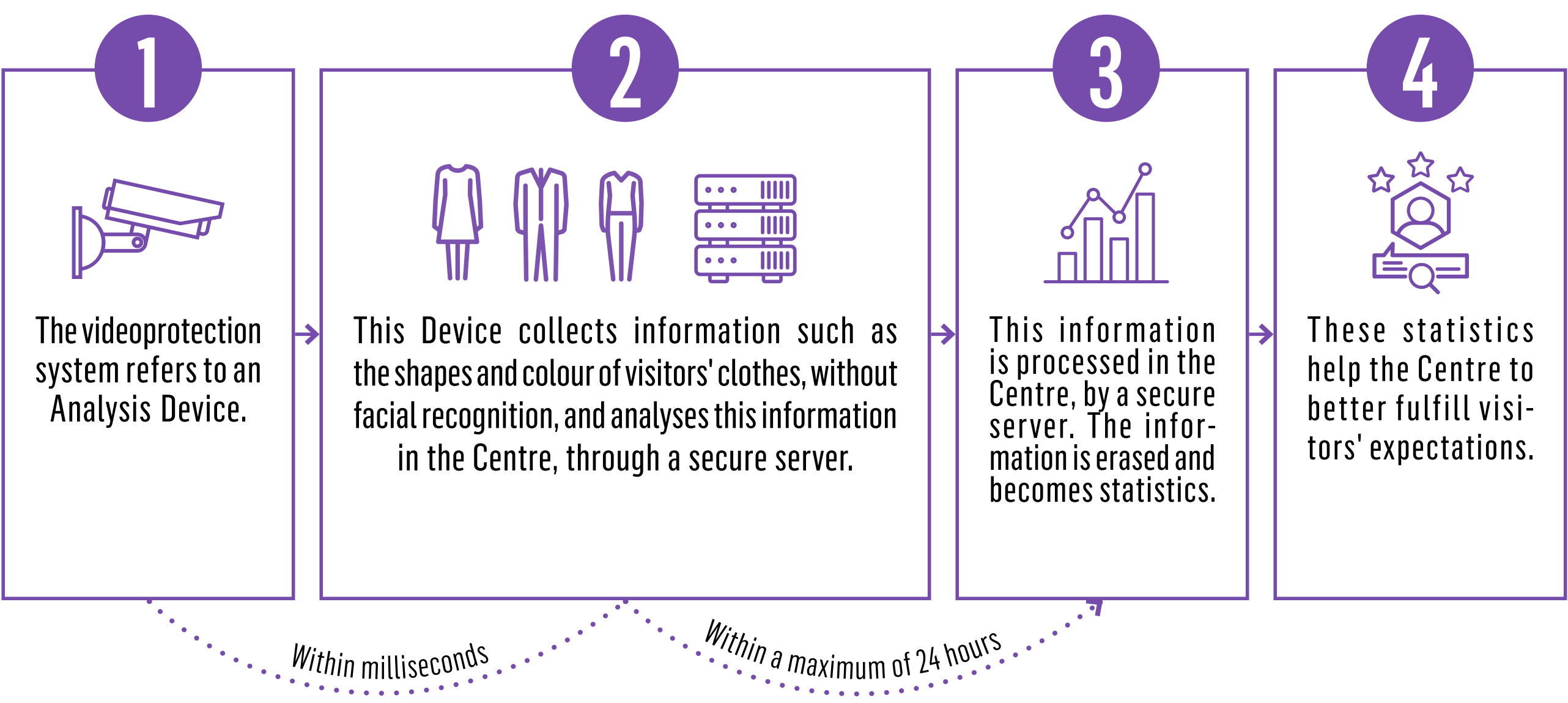


Privacy policy of the audience measurement system (to better understand customer flows in order to improve the occupation of space within the Centre to optimize the customer experience)

In order to understand your needs and better meet your expectations, your shopping centre (hereinafter the "Centre") has set up an innovative system to analyze customer movement within the Centre (hereinafter the "Device"). This Device, which is based on images taken from video cameras around the Centre, generates aggregated and anonymous statistics that are then analyzed by our teams.

The Device works as follows:



How do we use the information produced by this Device?

The information provided by this Device are intended to help us:

- Understand the behavior of our customers in order to better meet their needs and expectations according to pedestrian flows, and therefore:
 - optimize the offer of shops and their locations
 - optimize the management of the Centre and its pedestrian flows
- Measure the impact of our innovations, the success of our events, services and communications, and adapt them to continue to offer the best possible shopping experience to our customers, and therefore:
 - adapt our services offer (e.g. rest areas, children's play areas, etc.)
 - measure and anticipate the traffic of our events (e.g. concerts)
- This Device generates aggregated and anonymized statistics and:
 - does not rely on facial or biometric recognition
 - does not allow to identify customers individually
 - does not allow the sending or immediate display of advertisements to customers
 - does not allow for action at individual level

More information

Who is the data controller and the data protection officer?

The companies Unibail Management (RCS Paris n° 414 878 389) and Westfield Europe Limited ("Westfield") (registered number 03912122) are jointly responsible for the processing. Head office of Unibail Management is located at 7 Place du Chancelier Adenauer, 75016 Paris. Head office of Westfield is located at 4th Floor, 1 Ariel Way, London, W12 7SL
You can contact: Unibail Management data protection officer by sending an e-mail to the following address: data.protection@urw.com and Westfield data privacy team by sending an e-mail to the following address: dpo@urw.com

What is the legal basis for this processing?

We use legitimate interests as the legal basis for processing personal data of customers of the Centre through the Device. Legitimate Interests are to better understand the flow of customers in order to improve the occupation of space of the Centre and to optimize its layout to better the customers' experience in our Centre.

Which categories of data are processed?

This Device uses images from the Centre's cameras and extracts information about the colors and shapes of customers' clothing within a few seconds. This information is then processed by a software program, without storing the source image from the camera, to generate aggregated and anonymized statistics.

This Device cannot and is not intended to identify individuals and does not perform any biometric or facial recognition analysis based on the cameras or images.

Who has access to this data?

Customer images and information about the color and shape of the clothing of customers of the Centre are accessible and processed only by authorized employees of our subcontractor. Unibail Management and Westfield only have access to aggregated and anonymized statistics.

What is the data retention period?

The images are not kept for this treatment. The extracted information (shapes and colors of the customers' clothes) are kept for a maximum of 24 hours, then deleted. Only anonymized statistical data are kept.

1. Images are processed within a few milliseconds to extract information (shapes and colors of customers' clothes).
2. Once extracted, this information is processed securely and anonymized within a maximum of 24 hours
3. This information allows the elaboration of aggregated and anonymized statistics. Only these statistics are kept by the Centre.

What are your rights?

In accordance with the law, you have various rights with regard to the processing of your personal data, however, the rights of access, rectification and erasure of personal data concerning you cannot be exercised in the context of this processing insofar as no personal data is kept in an identifiable form during the period allowing the exercise of these rights.

As the processing carried out on the images has statistical purposes and the implementation of an opposition mechanism would, on the one hand, be more intrusive than the processing itself and, on the other hand, would prevent reliable statistical results from being obtained, the right to object cannot be exercised either.

For more information on the processing of your personal data, you can contact the data privacy team of your Centre by email to: dpo@urw.com or by post to: Data Privacy Team, Unibail-Rodamco-Westfield, 4th Floor, 1 Ariel Way, London, W12 7SL. In any case, if you feel that your rights have not been respected, you may submit a complaint to the Data Protection Authority. In the U.K, this is the Information Commissioner's Office (ICO). You may contact the ICO by phone (+44 (0)3031231113), email (casework@ico.org.uk) or by post (Customer Contact, Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF).