

# Responsible Data Collection

## Purpose and Legitimate Interest

LondonMetric processes utility data under the lawful basis of Legitimate Interests in accordance with Article 6(1)(f) of the UK GDPR.

We have undertaken a legitimate interest assessment to ensure that the collection and processing of this data is necessary for sustainability reporting, environmental performance management and climate risk management, and that such processing does not override the rights and freedoms of occupiers.

Detailed reasons for access to this data include:

### 1. **Improve energy efficiency and drive sustainability goals**

- Track and manage building performance
- Identify opportunities for energy reduction
- Support long-term decarbonisation strategies in conjunction with our occupiers.

### 2. **Comply with environmental, social and governance (ESG) disclosure obligations**

- Meet reporting standards including but not limited to the Global Real Estate Sustainability Benchmark (GRESB), the Task Force on Climate-related Financial Disclosures (TCFD) and European Public Real Estate Association Sustainability Best Practices Recommendations (EPRA sBPR).

### 3. **Enhance climate resilience across our portfolio**

- Proactively manage risks with data-driven insights

## **Types of Data Collected**

Data collected may include, but is not limited to:

- Electricity consumption data
- Gas consumption data
- Water consumption data
- Meter identifiers or supply point reference numbers (MPAN/MPRN)

LondonMetric does **not collect personal data about individuals through this process unless it is voluntarily provided by the** occupiers. **Billing and commercial information are also not collected** by LondonMetric, unless voluntarily provided by the occupiers.

## Transparency and Tenant Rights

Under UK GDPR, occupiers may have rights including:

- the right to access their data
- the right to rectify inaccurate data
- the right to restrict processing
- the right to object to processing

Requests can be submitted to [sustainability@londonmetric.com](mailto:sustainability@londonmetric.com)

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## **Safeguards to Protect Tenant Privacy**

Data collection and processing is limited to what is strictly necessary for the intended purposes (as outlined above) and information provided will never be disclosed publicly, except on an aggregated portfolio basis.

Third-party service providers acting as data processors may collect, store or analyse utility data on behalf of LondonMetric. These providers operate under contractual agreements requiring compliance with UK GDPR and appropriate information security standards.

Appropriate technical and organisational security measures are implemented, including encryption, restricted access controls and secure data storage.

Where data is transferred outside the UK or European Economic Area, appropriate safeguards such as Standard Contractual Clauses will be applied.

## **Data Retention**

Utility data will be retained only for as long as necessary to support:

- sustainability reporting and regulatory disclosure obligations
- building performance analysis
- portfolio-level environmental monitoring

Data will be periodically reviewed and securely deleted when no longer required.

For any questions regarding data protection or privacy, please contact LondonMetric via [sustainability@londonmetric.com](mailto:sustainability@londonmetric.com).