

# **GROWTHPOINT**

PROPERTIES

## **GROWTHPOINT PROPERTIES AUSTRALIA LIMITED**

ACN 124 093 901

being the responsible entity for the

Growthpoint Properties Australia Trust ARSN 120 121 002

# Privacy Policy

# Privacy Policy

## INTRODUCTION

This document sets out our policy on the handling of personal information.

We are subject to the Privacy Act and other laws which protect your privacy. In some cases, we may be exempt from some or some aspects of these laws, in which case we may rely on those exemptions despite this policy. For example, the Privacy Act includes an exemption for the handling of employee records in some circumstances.

In this policy 'we' means Growthpoint Properties Australia Limited, Growthpoint Properties Australia Trust and their related bodies corporate.

## WHY WE COLLECT PERSONAL INFORMATION

We collect, hold, use and disclose personal information to operate our business. This includes:

- managing our property investment portfolio
- facilitating investments in Growthpoint
- maintaining and updating our records
- communicating and managing our relationships with stakeholders including our staff and business contacts representing investors, tenants, property agents and others
- recruiting, training and managing staff
- protecting our lawful interests
- facilitating acquisitions and potential acquisitions of our business.

We may not be able to do these things without your personal information. For example, we may not be able to communicate with you or consider your application for employment.

## HOW WE COLLECT PERSONAL INFORMATION

We collect personal information you provide to us directly. In some circumstances we also collect personal information through other means including publicly available sources, our related companies and your organisation, colleagues and representatives.

Our website may use Google services such as Google Analytics from time to time. For more about how Google collects and processes data, and your privacy choices with Google, please see Google's privacy policy and their information at [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/).

## TYPES OF PERSONAL INFORMATION COLLECTED

We collect current and historical personal information including information about your name, contact details, identification, organisation, employment, positions held, forms submitted, payment details and enquiry/complaint details. We also collect personal information about your dealings with us, including from records of any contact we have with you by telephone, email or online.

If you are a securityholder, we also collect investment details. We collect some personal information under laws including the Income Tax Assessment Act and the Corporations Act.

If you apply for a position with us, we also collect information about your qualifications, skills, experience, character and screening checks (including health, reference, background, directorship, financial probity, identity, eligibility to work, vocational suitability and criminal record checks). In addition, if you join our staff, we collect information relating to your current or former employment or engagement including information about your training, disciplining, resignation, termination, terms and conditions, staff benefits, emergency contact details, performance, conduct, use of our IT

---

## Privacy Policy

resources, payroll matters, union or professional/trade association membership, recreation, drug/alcohol tests, leave and taxation, banking or superannuation affairs. We collect some of this personal information under laws including the Fair Work Act, Superannuation Guarantee (Administration) Act and Income Tax Assessment Act.

### **DISCLOSURE OF PERSONAL INFORMATION**

We may exchange your personal information with our related bodies corporate, your organisation colleagues and representatives and with our service providers including providers of real estate, property management, data storage, auditing, accounting, legal, business consulting, debt collection, delivery, data processing, data analysis, document management, information broking, research, investigation, insurance, website and technology services.

If you are a securityholder please note that we use Computershare to assist with registry and investor relations services. Computershare's privacy policy is available via [www.computershare.com.au](http://www.computershare.com.au).

If you apply for a position with us, we may exchange your personal information with academic institutions, recruiters, screening check providers, health service providers, professional and trade associations, law enforcement agencies, referees and your current and previous employers. In addition, if you join our staff, we may exchange your personal information with your representatives (including unions), other employers seeking a reference about you and our service providers including providers of payroll, superannuation, banking, staff benefits, surveillance and training services.

### **STORAGE AND SECURITY OF PERSONAL INFORMATION**

We implement a range of measures to protect the security of personal information, including – depending on the circumstances – electronic access controls, premises security and network firewalls. We hold personal information electronically and in hard copy form, both at our own premises and with the assistance of our service providers. In the event a person ceases to be an investor, employee or similar of Growthpoint, any personal information we hold will be maintained on site or in a secure offsite storage facility for up to seven years in order to comply with legislative and professional requirements.

### **YOUR PRIVACY RIGHTS**

You can contact us if you wish to access or correct any personal information we may hold about you. We will respond within a reasonable time and may need to verify your identity.

Please provide as much detail as you can about the particular information you seek, in order to help us locate it. We will provide our reasons if we deny any request for access to or correction of personal information. Where we refuse to make a requested correction, you can ask us to make a note of your requested correction with the information.

We will not provide access to personal information which would reveal any confidential formulae or details of any in-house evaluative decision making process, but may (in our sole discretion) instead provide the result of the formulae or process or an explanation of that result.

You can contact us if you have any concerns about how we have handled your personal information. We may request additional details from you regarding your concerns, and may need to engage or consult with other parties in order to investigate and deal with your issue. We will keep records of your request and any resolution.

---

## Privacy Policy

### **HOW TO CONTACT US**

All enquiries to this policy or privacy in general should be directed to the Growthpoint Privacy Officer through one of the following contact points:

Address: Growthpoint Properties Australia Limited

Level 22, 357 Collins Street, Melbourne, VIC 3000

Telephone: (03) 8681 2900

Email: [privacy@growthpoint.com.au](mailto:privacy@growthpoint.com.au)

### **ADDITIONAL INFORMATION**

Additional information about privacy in Australia may be obtained by visiting the web site of the Office of the Australian Information Commissioner at [www.oaic.gov.au/privacy](http://www.oaic.gov.au/privacy)

Reviewed and approved by: Managing Director

Date: 16 June 2014

---