



Privacy Policy

Introduction

This document sets out the privacy policy for Growthpoint Properties Australia Limited ACN 124 093 901, Growthpoint Properties Australia Trust ARSN 120 121 002 and their related bodies corporate from time to time (“Growthpoint Group”) on the handling of personal information. In this policy, references to “we”, “our”, “us” and “Growthpoint” are references to the Growthpoint Group.

“Personal information” is information or an opinion about a living identified individual or information capable of reasonably identifying an individual and includes “sensitive information” (information relating to racial or ethnic origin, political opinions, religious or other similar beliefs, philosophical beliefs, membership of a political association, professional or trade association or trade union, health information, sexual orientation, or the commission or alleged commission of an offence and associated proceedings, as well as complete credit card numbers or other unique identifiers. Information or an opinion is personal information regardless of whether it is true, recorded in a material form or publicly available.

We are committed to complying with the Australian Privacy Principles (“APPs”) in the *Privacy Act 1998* (Cth) 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 1998* (Cth) includes an exemption for the handling of employee records in some circumstances.

How we collect personal information

We will generally collect your personal information directly from you, including through communications with you in person, by telephone, by email, through our website or through social media. In some circumstances, we may also collect personal information through other means, including through publicly available sources, through our related companies or from your organisation, colleagues and representatives. We will generally only collect personal information about you from a third party where it is not reasonable or practical for us to collect such information directly from you.

We may also collect personal information through closed circuit television (“CCTV”) surveillance systems in use at our office premises and at properties in our investment portfolio. We will treat any personal information we collect through these CCTV systems in accordance with this policy.

When you use our website, we do not attempt to identify you as an individual user and we will not collect personal information about you unless you specifically provide it to us. We may sometimes collect your personal information with your permission via an online form or by email, for example, if you submit a general enquiry via our contacts page, subscribe to our Investor Centre email list or send a written complaint or enquiry. We may create links to third party websites and if we do, we are not responsible for the content or privacy practices employed by those linked websites.

Cookies are used on our website, which are small piece of text sent to your browser which help our website remember information about your visit which can make your next visit easier and our website more useful to you. You can disable your web browser from accepting cookies. If you do so, you can still access our website, but not all services or functions will be available.

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/.

Types of personal information we collect

The types of personal information we may collect about you include your name, gender, date of birth, contact details, identification, organisation, employment, positions held, professional experience and qualifications, CCTV images and video footage, forms submitted, payment details, insurance details, interests and preferences and enquiry/complaint details. We also collect personal information about your dealings with us, including records of contact we have had with you in person, by telephone, by email or where you have submitted online enquiries through our website.

If you are a securityholder, we also collect details of your investment including security holder details, balances and tax file numbers. We may also collect personal information as required by law including under the *Income Tax Assessment Act 1997* (Cth) and the *Corporations Act 2001* (Cth).

If you apply for a position with us, we may 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 may 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 resources, payroll matters, union or professional/trade association membership, recreation, drug/alcohol tests, leave and taxation, banking or superannuation affairs. We are obligated to collect some of this personal information by law, including under the *Fair Work Act 2009* (Cth), *Superannuation Guarantee (Administration) Act 1992* (Cth) and *Income Tax Assessment Act 1997* (Cth).

How we use your personal information

We use personal information we collect about you for the purposes of operating our business and providing our services to you, which include:

- managing our property investment portfolio;
- facilitating investments in the Growthpoint Group;
- maintaining and updating our records;
- processing payments;
- communicating and managing our relationships with stakeholders including our staff and business contacts representing investors, tenants, property agents, service providers and others;
- recruiting, training and managing staff;
- communicating with you and administration of our relationship with you;
- protecting our lawful interests and dealing with unlawful activity or misconduct;
- facilitating acquisitions and potential acquisitions by the Growthpoint Group and negotiating and documenting those transactions; and
- evaluating transactions with potential or existing tenants, documenting those transactions and performing our obligations under those documents.

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.

If you choose not to provide personal information to us or if you provide incomplete or inaccurate information, we may be unable to provide you with certain services.

We will use personal information obtained from our CCTV systems for the purpose of maintaining the safety and security of our occupants, visitors, employees, contractors and other attendees to our office premises and investment properties.

We may also use your personal information for secondary purposes related to those set out above which you would reasonably expect (as permitted by the *Privacy Act 1988* (Cth)).

Disclosure of personal information

We may disclose your personal information within the Growthpoint group, to your organisation colleagues and representatives and with our service providers including financial institutions, 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.

- We may also disclose CCTV footage to third parties in circumstances where we consider it reasonable and lawful for us to do so, including if:
- we believe that there has been unlawful activity or misconduct of a serious nature and that the disclosure will allow appropriate action to be taken in relation to the matter;
- we believe that the disclosure is reasonably necessary to lessen or prevent a serious threat to the life, health or safety of any individual or to public health or safety; or

we believe that the disclosure is reasonably necessary to assist in the location of a person who has been reported missing. We may also disclose your personal information if we are required or authorised under Australian law or by a court/tribunal order such as where an order or notice issued by a court requires us to produce certain records.

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.

From time to time, we may need to disclose your personal information to third parties located outside of Australia (including disclosure of personal information to our related entities located in South Africa). If we do so, we will take reasonable steps to ensure that these third parties comply with the APPs or privacy obligations which are substantially the same as the APPs. However, you acknowledge that we cannot control, and are not liable for, the acts and omissions of these third parties.

Storage and security of personal information

We implement a range of measures to protect the security of personal information that we hold from misuse, interference, loss, unauthorised access, modification or disclosure, 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.

Under the *Privacy Law 1988* (Cth), we have a mandatory obligation to notify the Office of the Australian Information Commissioner and affected individuals of any unauthorised access, disclosure or loss of personal information that we hold which is likely to result in serious harm.

In general, if a data breach creates a real risk of serious harm to the affected individual(s), they will be notified.

We will destroy or permanently de-identify any of your personal information in our possession or control and which is no longer reasonably needed for the purpose for which it was collected, including in the event a person ceases to be an investor, employee or similar of Growthpoint, provided we are not required under an Australian law or court/tribunal or otherwise to retain the information. We may retain certain personal information 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 have a right to 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. We may also charge a reasonable fee for providing you with access to personal information we hold about you. Please provide as much detail as you can about the particular information you seek in order to help us locate it. We will provide full reasons if we deny any request for access to or correction of your personal information. Where we refuse to make a requested correction, you can ask us to make a note of your requested correction with the relevant personal 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 or complaints about how we have handled your personal information. We may request additional details from you regarding your concerns or complaints, 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.

How to contact us

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

Post: Privacy Officer
Growthpoint Properties Australia Limited
Level 31, 35 Collins Street
Melbourne VIC 3000

Telephone: (03) 8681 2900

Email: privacy@growthpoint.com.au

We will attend to your enquiry within a reasonable timeframe. If you have made a complaint and you are not satisfied with our response or consider that the complaint has not been adequately resolved, then you may make a formal written complaint to the Office of Australian Information Commissioner.

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-law/.

Reviewed and approved by: Managing Director

Date: 24 January 2018