



Privacy Policy

Purpose

Growthpoint Properties Australia (**Growthpoint**) is committed to conducting its business to the highest standard and a culture of corporate compliance, integrity and responsible and ethical behaviour.

This policy describes the privacy practices of Growthpoint Properties Australia (**Group, we, our or us**), which is comprised of Growthpoint Properties Australia Limited ACN 124 093 901 (**GPAL**) (both in its personal capacity and in its capacity as responsible entity for the Growthpoint Properties Australia Trust ARSN 120 121 002 (**GPAT**)) (**Growthpoint**) and the controlled entities of GPAL and GPAT from time to time. The Group includes Fortius Funds Management Pty Ltd ACN 093 111 641 and its controlled entities from time to time (**Fortius**).

The term “personal information” has the meaning given in the *Privacy Act 1988* (Cth) (**Privacy Act**), being “information or an opinion about an identified individual, or an individual who is reasonably identifiable: (a) whether the information or opinion is true or not; and (b) whether the information or opinion is recorded in a material form or not”.

We are committed to protecting the privacy of individuals and are bound by the Privacy Act (including the Australian Privacy Principles). We will collect, use and disclose personal information in accordance with the Privacy Act and any other applicable laws.

Policy application

All Group employees and officers must comply with this policy.

Most of the practices described in this privacy policy apply to all of the Group, however, there are certain practices which relate to Fortius only, which are specified below.

Policy

1. Collection of personal information

1.1 How we collect personal information

We collect your personal information in the following ways:

- **Directly from you** – this includes through communications with you in person, by telephone, by email and through our websites, for example, if you are a security holder or investor, or when you submit an online enquiry or subscribe to an email list, or through social media.
- **Through publicly available sources and from third parties (where unreasonable or impractical to collect directly from you)** – this includes from your organisation or representatives, recruitment agencies, previous employers, government departments, third party service providers or Google Analytics.
- **Through closed circuit television (CCTV)** – these surveillance systems may be in use at our office premises and at properties in our investment portfolio.
- **Via cookies, where enabled** – our websites use cookies to help the websites to remember information about your visit (which can make the websites more useful to you). You can disable

your web browser from accepting cookies. If you do so, you can still access our websites, but not all services or functions will be available.

- **Through Fortius-managed shopping centres (Fortius only)** – this includes when you connect to in-centre Wi-Fi or when you scan QR codes during centre events.

1.2 The kinds of personal information we collect

General

We may collect:

- personal details such as your name, gender, date of birth and contact details;
- CCTV images and video footage captured in our office premises and properties;
- payment and insurance details which you submit to us;
- your interests, preferences, enquiries and complaint details;
- records of the communications we have had with you in person, by telephone, by email or through our websites;
- where you have enabled cookies, technology information about your use of our websites (such as your internet protocol address, login information, browser type and version); and
- for Fortius only, information about your location when you use the in-centre Wi-Fi or a QR code.

Job applicants and employees

If you apply for a position with us or join our staff, we may collect:

- your qualifications, skills, experience and character;
- your screening checks (including health, reference, background, directorship, financial probity, identity, visa and eligibility to work, vocational suitability and criminal record checks);
- in relation to your current or former employment, your training, disciplining, resignation, termination terms and conditions, staff benefits, emergency contact details, performance and conduct;
- your payroll, taxation, banking or superannuation affairs;
- your union or professional / trade association membership;
- your drug / alcohol tests;
- your leave (including personal and parental leave) and recreation;
- your use of our IT resources; and
- any other personal information reasonably required under the *Fair Work Act 2009* (Cth) and *Superannuation Guarantee (Administration) Act 1992* (Cth) and *Income Tax Assessment Act 1997* (Cth), or any other applicable law to the Group.

Some of the information described above is sensitive information (for example: health information and membership of a trade union). Where we collect your sensitive information, we will only do so in accordance with our obligations under the Privacy Act.

Securityholders of Growthpoint and investors of Fortius

If you are a securityholder of Growthpoint, or an investor in a Fortius fund, we may collect:

- your security holder or investor details;
- your securities or investment balance;
- your tax file number;
- your bank details;
- for investors in Fortius funds only, your employment details and information about your financial position including your income and expenses; and
- any other personal information reasonably required under *the Income Tax Assessment Act 1997* (Cth) and the *Corporations Act 2001* (Cth) or any other applicable law to Growthpoint or Fortius.

2. Purpose of collection

We collect personal information for a range of purposes including, but not limited to:



- managing our property investment portfolio;
- facilitating investments in the Group;
- maintaining and updating our records;
- processing payments;
- communicating and managing our relationships with our stakeholders, security holders and investors;
- recruiting, training and managing our staff;
- communicating with you and carrying out the administration of our relationship with you;
- protecting our lawful interests and dealing with unlawful activity or misconduct;
- facilitating acquisitions and potential acquisitions and negotiating and documenting those transactions;
- evaluating transactions with potential or existing tenants, documenting those transactions and performing our obligations under those documents;
- making our websites more useful and easier for you to use;
- processing your online enquiries effectively;
- maintaining the safety and security of our occupants, visitors, employees, contractors and other attendees to our office premises and investment properties;
- compliance with laws and regulations in connection with operating our business and providing services to you;
- identifying Fortius investors as required under the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth) and other applicable laws; and
- for Fortius only, collecting information on the length of time you spend within Fortius-managed shopping centres.

3. Use and disclosure

3.1 Use and disclosure of personal information

We may use or disclose your personal information:

- for the purpose(s) for which it was collected as set out in Section 2;
- for a secondary purpose that is related to a purpose for which we collected it, where you would reasonably expect us to do so; or
- otherwise where you have either provided your consent or where permitted by law.

Some of the third parties to whom we disclose your personal information may be located outside of Australia. For example, this may occur for the purpose of payments, administrative services and to obtain other services from third parties.

The countries in which these third parties are located will depend on the circumstances.

3.2 Disclosure of personal information

General

We may disclose your personal information to:

- your organisation, colleagues and representatives;
- our financial institutions; and
- third parties who require the information in order to provide the following services to us:
 - real estate and property management;
 - auditing, accounting, legal and business consulting;
 - debt collection and delivery;
 - data storage, processing and analytics;
 - document management, information broking and research;
 - investigation and insurance; and
 - website and technology.



Job applicants and employees

If you apply for a position with us or join our staff, we may disclose your personal information to:

- academic institutions;
- recruiters and screening check providers;
- health service providers;
- professional and trade associations;
- law enforcement agencies;
- referees, your current and previous employers and other employers seeking a reference about you;
- your representatives (including unions); and
- service providers including providers of payroll, superannuation, banking, staff benefits, surveillance and training services.

Securityholders of Growthpoint

If you are a securityholder of Growthpoint, please note that Growthpoint uses Computershare Investor Services Pty Limited (**Computershare**) to assist with registry and investor relations services. Computershare's privacy policy is available via www.computershare.com.au.

Where individuals provide information to Computershare directly, this will be handled in accordance with the terms of the individual's engagement with Computershare (including Computershare's privacy policy).

Investors of Fortius

If you are an investor in a Fortius fund, please note that Fortius uses Boardroom Pty Limited (**Boardroom**) to collect, use and handle all investors' personal information. Boardroom's privacy policy is available via <https://boardroomlimited.com.au/corp/privacy-policy>.

Where individuals provide information to Boardroom directly, this will be handled in accordance with the terms of the individual's engagement with Boardroom (including Boardroom's privacy policy).

4. Storage and security of your personal information

We may store your files in hard copy in our premises or with the assistance of service providers or electronically in our IT systems. These may include Australian-based cloud servers or the servers of third parties located within or outside of Australia.

We take reasonable steps as required by the Privacy Act to keep all personal information we hold secure. We use a range of physical and electronic security measures to protect personal information including:

- electronic access controls;
- premises security;
- network firewalls;
- secure offsite and on site storage facilities;
- corporate governance and workplace policies and training; and
- arrangements which require third party service providers to maintain the security of information.

Under the Privacy Act, 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.

We will destroy or permanently de-identify any personal information that we no longer need, unless we are required to keep the information for legal reasons or to comply with our professional obligations.

5. Seeking access to and correction of your personal information

You may request access to, or correction of, your personal information by contacting us as set out in Section 6. We will respond within a reasonable time and may need to verify your identity.

In some circumstances we may charge a reasonable fee for providing access to this information. We may also refuse access to, or correction of, the information if necessary and permitted by law.

6. How you may make a complaint

6.1 Making a complaint to us

If you have any questions about our privacy practices or believe that we have not complied with the Privacy Act, you may contact us as follows:

Growthpoint Properties Australia

Attention: Privacy Officer

Growthpoint Properties Australia Limited

Level 18, 101 Collins Street

Melbourne VIC 3000

Telephone: (03) 8681 2900

Email: privacy@growthpoint.com.au

The Privacy Officer will investigate any privacy complaint and determine whether a breach has occurred and what action, if any, to take. When contacting us, please provide as much detail as possible in relation to the complaint.

We will take any privacy complaint seriously and aim to resolve the complaint in a timely and efficient manner. We request that you cooperate with us during this process and provide us with relevant information we may require. We 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.

6.2 Making a complaint the privacy regulator

We expect our procedures will deal fairly and promptly with your complaint. However, if you remain dissatisfied, you can also make a formal complaint in writing to the Office of the Australian Information Commissioner (which is the regulator responsible for privacy in Australia):

Mail: Director of Compliance

Office of the Australian Information Commissioner

GPO Box 5218

Sydney NSW 2001

Telephone: 1300 363 992

Website: www.oaic.gov.au

Related policies

This policy is an integral part of Growthpoint's risk management and compliance framework and should be read in conjunction with, but not limited to, Growthpoint's Code of Conduct and Whistleblower Policy.



Policy review

This policy will be periodically reviewed and updated (if required) to ensure that it is operating effectively to meet the needs of the Group, at least every two years or earlier in response to any significant regulatory developments or policy breaches. You should check our websites as applicable, to stay up to date.

Policy approval date

11 October 2022 by the Managing Director.