

OLIVER HUME PRIVACY POLICY

INTRODUCTION

We are a multi-disciplinary property organisation, with specialist divisions including project sales and marketing, residential developments, land acquisitions and sale, funds management and property development. For the purpose of this policy, reference to 'the **Group**' includes Oliver Hume Corporation Pty Ltd ACN 158 419 160; Oliver Hume Real Estate Group Pty Ltd ACN 158 513 190, Oliver Hume Real Estate Group (Apartments) Pty Ltd ACN 158 624 876, Oliver Hume Real Estate Group (OLD) Pty Ltd ACN 158 624 867; Oliver Hume Real Estate Group (NSW) Pty Ltd ACN 167 080 499; Oliver Hume Property Connect Pty Ltd ACN 606 493 976; Oliver Hume Community Connect Pty Ltd ACN 609 195 833; Oliver Hume Community Connect (Nord) Pty Ltd ACN 609 197 846; Oliver Hume Property Syndications Pty Ltd ACN 158 631 997, Oliver Hume Property Funds Pty Ltd ACN 107 091 770; Oliver Hume Australia Foundation Fund (Series 2) Pty Ltd ACN 158 829 988, OHAPIF Pty Ltd ACN 167 080 542; Oliver Hume SmartInvest Management Pty Ltd ACN 609 038 931; Oliver Hume Australia Foundation Fund (Series 5) Pty Ltd ACN 602 240 648; Oliver Hume Australia Income Fund (Series 8 USD) Pty Ltd ACN 602 240 700, and any other companies substantially owned by, or having directors associated, with Oliver Hume Corporation Pty Ltd.

- 1.1 In our capacity as a real estate agent, we act as agent for landowners and property developers (our clients) in the selling and leasing of their property products, including land lots, house and land packages and apartments. In our capacity as a funds manager, we act on behalf of investors and key financial stakeholders.
- 1.2 In the course of our business in Australia, there are circumstances where we collect personal information. This privacy policy has been developed to ensure that such information is handled appropriately.
- 1.3 We are committed to complying with the Privacy Act 1988 (Cth) (Privacy Act) in relation to all personal information we collect. Our commitment is demonstrated in this policy. The Privacy Act incorporates the Australian Privacy Principles (APPs). The APPs set out the way in which personal information must be treated.
- 1.4 This privacy policy also incorporates our policy on managing credit information (see particularly section B).

Who does the privacy policy apply to?

- 1.5 This policy applies to any person for whom we currently hold, or may in the future collect, personal information.

What information does the privacy policy apply to?

- 1.6 This policy applies to personal information. In broad terms, 'personal information' is information or opinions relating to a particular individual who can be identified.
- 1.7 Information is not personal information where the information cannot be linked to an identifiable individual.

How do we manage the personal information we collect?

- 2.1 We manage the personal information we collect in numerous ways, such as by:
- (a) implementing procedures for identifying and managing privacy risks;
 - (b) implementing security systems for protecting personal information from misuse, interference and loss from unauthorised access, modification or disclosure;
 - (c) providing staff with training on privacy issues;
 - (d) implementing mechanisms to ensure any agents or contractors who deal with us comply with the APPs;
 - (e) implementing procedures for identifying and reporting privacy breaches and for receiving and responding to complaints;
 - (f) appointing a privacy officer within the business to monitor privacy compliance; and
 - (g) allowing individuals the option of not identifying themselves, or using a pseudonym, when dealing with us in some circumstances.
- 2.2 We will take reasonable steps to destroy or permanently de-identify personal information if that information is no longer needed for the purposes for which we are authorised to use it.
- 2.3 In limited circumstances, such as for prospective clients or investors, it may be possible for you to use a pseudonym or remain anonymous when initially dealing with us. If you wish to use a pseudonym or remain anonymous you should notify us when making first enquiries. We will use our best endeavours to deal with your request, subject to our ability to provide you with the requested services without using your name.

What kinds of personal information do we collect and hold?

- 3.1 The kinds of personal information we might collect differs, depending on whether you are a prospective renter or purchaser; an existing purchaser,

renter or owner; a building partner of ours; a land owner, developer or consultant; or an investor or financial partner.

Personal information (prospective renter or purchaser]

3.2 We will collect and hold personal information about you, which might include:

- (a) contact information;
- (b) details regarding your investment preferences and objectives;
- (c) financial information;
- (d) investment details;
- (e) date and place of birth;
- (f) gender;
- (g) current employment;
- (h) purchase/rental history;
- (i) credit information;
- (j) banking details;
- (k) property preferences; and
- (l) any other personal information required to provide you with the requested services or to assist us in establishing a customer profile for you.

Personal information (existing purchaser, renter or owner)

3.3 We will collect and hold personal information about you, which might include:

- (a) contact information;
- (b) financial information;
- (c) investment details;
- (d) date and place of birth;
- (e) gender;
- (f) employment details;

- (gJ) details regarding your current purchases and rental history;
- (h) credit information;
- (I) property preferences;
- (jJ) banking details; and
- (k) any other personal information required to provide you with the requested services or to assist us in maintaining a customer profile for you.

Personal information (building partners)

3.4 We will collect and hold personal information about you, which might include:

- (a) contact information;
- (b) financial information;
- (c) employment details;
- (d) credit information;
- (e) banking details; and
- (f) any other personal information required to facilitate the relationship between you and us in connection with our work.

Personal information (land owner, developer or consultant)

3.5 We will collect and hold personal information about you, which might include:

- (a) contact information;
- (b) financial information;
- (c) credit information;
- (d) banking details; and
- (e) any other personal information required to facilitate the relationship between you and us in connection with our work.

Personal information (investors and financial partners)

3.6 We will collect and hold personal information about you, which might include:

- (a) contact information;

- (b) financial information;
- (c) investment details;
- (d) date and place of birth;
- (e) gender;
- (f) credit information;
- (g) banking details; and
- (h) any other personal information required to assist us in facilitating the investment or financial relationship with you.

Sensitive information

3.7 We do not generally collect sensitive information about individuals.

How and when do we collect personal information?

4.1 Our usual approach to collecting personal information is to collect it directly from you.

4.2 We might also collect personal information in other ways, for example:

- (a) from electronic queries sent to us;
- (b) from expression of interest forms;
- (c) through transactions with us;
- (d) through questionnaires you complete;
- (e) from subscriptions to our database;
- (f) from our sales representatives and agents;
- (g) from website cookies;
- (h) from paid search providers;
- (i) through referrals from individuals or other entities;
- (j) from our related entities within the Oliver Hume Group;
- (k) through marketing and business development events; and

- (l) from other third party providers.

4.3 If you wish, you may elect not to accept cookies on your browser. This should not adversely affect your experience when visiting our website.

How do we hold personal information?

5.1 Our usual approach to holding personal information includes:

- (a) physically at our offices (securely); and
- (b) electronically:
 - (i) on secure online servers and software and our CRM database; and
 - (ii) through third party software providers, such as the Marketo email marketing platform and the Console rental database.

5.2 We secure the personal information we hold in numerous ways, including:

- (a) scanning all documents into our secure database and returning originals or destroying copies;
- (b) using secure archiving for some documents;
- (c) using secure servers to store personal information; and
- (d) using unique usernames, passwords and other protections on systems that can access personal information.

Why do we collect, hold, use or disclose personal information?

6.1 We take reasonable steps to use and disclose personal information for the primary purpose for which we collect it. The primary purpose for which information is collected varies, depending on the particular service being provided, but is generally to provide any of the following services to you or your business (**Services**):

- (a) to assist in the sale and marketing of land, medium and high density developments;
- (b) for project marketing purposes;
- (c) to assist in acquiring and selling residential, industrial and commercial development sites;
- (d) to assist in determining residential development and investment opportunities;

- (e) for investing in property development projects; and
- (f) delivering corporate advisory services, asset management and project management services, or any other service in connection with our business.

6.2 In the case of potential employees, the primary purpose the information is collected is to assess the individual's suitability for employment.

6.3 In the case of builder partners, the primary purpose the information is collected is to assist us in creating partnerships to perform the Services.

6.4 Personal information may also be used or disclosed by us for secondary purposes which are within your reasonable expectations and which are related to the primary purpose of collection.

6.5 For example, we may also collect and use personal information:

- (a) to invite you to events;
- (b) in connection with tendering for building development projects;
- (c) to provide you with sales and product updates that are relevant to you or your business;
- (d) to provide you with market or sales offers, products and incentives;
- (e) to provide you with information on other initiatives undertaken by us, including financial services;
- (f) to assist in our customer profiling, so we can provide you with enhanced customer service; and
- (g) for research purposes.

6.6 We might disclose personal information to:

- (a) landowners and developers;
- (b) potential buyers, tenants, landlords and referees;
- (c) tradespeople, property inspection consultants and bodies corporate;
- (d) financial institutions;
- (e) external auditors and professional advisers;
- (f) government bodies;

- (g) other service providers or referral partners in order to provide the Services to you, or to assist our functions or activities (such as law firms);
- (h) other third parties such as direct marketing agencies, and sales, rental and investment consultants and project managers;
- (i) related entities within the Oliver Hume Group;
- (j) third party technology providers, such as our CRM database provider (Salesforce.com), Marketo email marketing platform and Console rental database;and
- (k) any other third parties incidental to us carrying out our functions as a professional real estate agency, funds manager or in providing the Services.

6.7 From time to time, our website may contain links to other websites with whom we have an association. This may include residential project websites for which we are the marketing and selling agent, clients' websites and industry related websites with whom we have an association. It should be noted that these websites may have a different privacy policy to our website, and you should check the privacy policies on their respective websites.

6.8 Otherwise, we will only disclose personal information to third parties if permitted by the Privacy Act.

Will we disclose personal information outside Australia?

7.1 From time to time, we may disclose information to overseas recipients if it is necessary to providing the Services. We also use software providers that store information securely primarily in the United States of America (for example, Marketo, Salesforce and Console rental database].

7.2 We take reasonable steps to ensure that the receiving party provides commitments to privacy and confidentiality which are at least equal to the APPs or the recipient is subject to privacy protection laws that offer at least the same level of protection as required under the Privacy Act in Australia.

How do we manage your credit information?

8.1 When we are acting in our capacity as a real estate agent, we are not a 'credit provider' for Privacy Act purposes.

What kinds of credit information may we collect?

8.2 However, in the course of our funds management business, we might collect and hold the following kinds of credit information:

- (a) your identification information;
- (b) information about any credit that has been provided to or by you; and
- (c) and publicly available information about your credit worthiness.

8.3 We do not generally collect credit information from credit reporting bodies.

8.4 We might collect personal information which may affect your credit worthiness from other credit providers (e.g. referees) that collect that information from credit reporting bodies. The kinds of personal information we collect may include any of those kinds of personal information outlined in sections 3.2 to 3.6 of this policy.

How do we store and hold the credit information?

8.5 We store and hold credit information in the same manner as outlined in section 5 of this policy.

Why do we collect the credit information?

8.6 Our usual purpose for collecting, holding, using and disclosing credit information about you is to enable us to provide you with the Services.

8.7 We may also collect the credit information to process payments or assess your eligibility for credit.

Overseas disclosure of the credit information

8.8 We will not disclose your credit information to entities without an Australian link unless you expressly request us to, it is in connection with the Services, or stored through any of our software platforms [eg Marketo, Salesforce or Console) that store information primarily in the United States of America.

How can I access my credit information, correct errors or make a complaint?

8.9 You can access and correct your credit information, or complain about a breach of your privacy in the same manner as set out in section 9 of this policy.

How do you make complaints and access and correct your personal information or credit information?

9.1 It is important that the information we hold about you is up-to-date. You should contact us if your personal information changes.

Access to information and correcting personal information

- 9.2 You should keep us informed about any and all changes to your personal information.
- 9.3 You may request access to the personal information held by us or ask us for your personal information to be corrected by using the contact details in this section.
- 9.4 We will grant you access to your personal information as soon as possible, subject to and in accordance with the Privacy Act.
- 9.5 In keeping with our commitment to protect the privacy of personal information, we may not disclose personal information to you without proof of identity.
- 9.6 We may deny access to personal information if:
- (a) the request is unreasonable;
 - (b) providing access would have an unreasonable impact on the privacy of another person;
 - (c) providing access would pose a serious and imminent threat to the life or health of any person; or
 - (d) there are other legal grounds to deny the request.
- 9.7 We may charge a fee for reasonable costs incurred in responding to an access request. The fee (if any) will be disclosed prior to it being levied.
- 9.8 If the personal information that we hold is not accurate, complete and up-to-date, we will take reasonable steps to correct it so that it is accurate, complete and up-to-date, where it is appropriate to do so.

Complaints

- 9.9 If you believe there has been a breach of your privacy you may make a complaint using the following process:
- (a) The complaint must be firstly made to us in writing, using the contact details in this section. We will require a reasonable time to respond to the complaint.
 - (b) In the unlikely event the privacy issue cannot be resolved, you may take your complaint to the Office of the Australian Information Commissioner.

Who to contact

9.10 A person may make a complaint or request to access or correct personal information we have about them. We will take reasonable steps to ensure the personal information we hold is accurate and complete. Such a request must be made in writing to the following address or contact officer:

Privacy Officer: Aaron Stead

Postal Address: The Privacy Officer

Oliver Hume Real Estate Group Pty Ltd

Level 2, 4 Riverside Quay

Southbank, VIC 3006

Telephone number: (03) 9669 5999

Email address: privacy@oliverhume.com.au

Changes to the policy

10.1 We may update, modify or remove this policy at any time without prior notice. Any changes to the privacy policy will be published on our website.

10.2 This policy is effective from March 2014. If you have any comments on the policy, please contact the privacy officer with the contact details in section 9.10 of this policy.