

## **APIL - Privacy Policy**

Australasian Property Investments Limited (ABN 51 097 936 760) (**we, our, us, APIL**) is committed to protecting the privacy of personal information that we hold. This Privacy Policy explains how we collect, use, disclose and hold personal information and how to contact us if you have any queries about personal information that we hold about you.

### **What is personal information?**

'Personal information' is information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not and whether the information or opinion is recorded in a material form or not. Examples include an individual's name, address, contact number and email address.

'Sensitive information' is a special category of personal information. Sensitive information includes health information and information about an individual's race or ethnic origin, philosophical beliefs, membership of a professional or trade association, membership of a trade union, religious or philosophical beliefs.

### **The kinds of personal information we collect and hold**

We collect and hold a range of personal information in carrying out our business and functions as a commercial property funds management syndicate. The kinds of personal information we collect and hold about you will depend upon the nature of our relationship with you and the circumstances of a collection, including whether we collect the information from you as an investor or potential investor or some other capacity.

For example

- For individuals investing in APIL products, we may collect your name, address, contact details and may include (depending on the product), trust or fund name, bank account details for income distributions by direct credit and tax file numbers and any other information you provide to us when you make an inquiry, complete an application form, provide feedback or correspond with us; and
- if you deal with us in some other capacity, we may collect your name and contact details and any other information you choose to provide to us.

We may also collect details of the interactions you have with us.

We confirm do not generally collect sensitive information and we will only collect sensitive information about you with your consent (unless we are otherwise required or authorised by or under law to do so).

If you provide us with personal information about another person, please make sure that you tell them about this Privacy Policy.

If you are or become an employee, the handling of your personal information may be exempt from the APPs if it is directly related to your current or former employment relationship with us.

If you approach us for information (such as government departments, regulatory authorities or media) we may record your name and contact details and collect additional personal information about you to verify your identity and consider whether to provide you with the information that you have requested.

## **Collection of Tax File Numbers**

This section applies (in addition to the rest of this Privacy Policy) if we ask for, or collect, your tax file number (**TFN**). We are authorised to collect the TFNs of investors under applicable taxation, personal assistance and superannuation laws, including the Income Tax Assessment Act 1936 (**Tax Laws**). The collection, use and disclosure of TFNs is regulated by applicable Tax Laws, the Privacy (Tax File Number) Rule made under the Privacy Act and the Australian Privacy Principles. We only collect your TFN for purposes required or authorised by law, including for the purpose of reporting information to the Australian Taxation Office or to give you any TFN information that we may hold about you.

It is not an offence to withhold your TFN. However, if you choose not to provide your TFN when investing with us, we may be required by law to deduct tax at the highest marginal tax rate plus the Medicare Levy from interest earned on your account unless you are exempt from providing a TFN. If you are exempt, please let us know the type of exemption that applies so that we do not deduct tax from the interest earned on the account.

For joint investors, a minimum of two TFNs should be provided (one for each person) if you decide to provide your TFN. For accounts in trust for someone else (such as your child) you should quote your own TFN. If a formal trust has been established, you can quote the trust's TFN. If your investment with us is made in the course of carrying on a business, you may provide us with an ABN instead of a TFN

## **How we collect personal information**

We collect personal information in a variety of ways, including

- from you directly (such as when you interact with us in writing, electronically or by telephone);
- when you communicate with us through our website;
- from third parties such as your financial adviser; and
- social media (such as LinkedIn and Facebook).

## **The purposes for which we collect, hold, use and disclose personal information**

We collect, hold, use and disclose personal information for a range of purposes including to:

- facilitate your investments in APIL products;
- verify your identity and comply with our obligations under the Anti-Money Laundering and Counter-Terrorism Financing Act (Cth) 2006;
- respond to your enquiries;
- process payments made to us;
- for our administrative purposes and internal record keeping;
- provide you with customer service or technical support and deal with any complaints or feedback you have;
- perform research and analysis and improve or develop our products or services;
- manage our relationships with our investors, suppliers and contractors; and
- assess and consider applications from prospective employees, contractors and service providers;
- organise events
- manage insurance
- comply with our legal and regulatory obligations.

We may use and disclose your personal information for other purposes required or authorised by or under law (including purposes for which you have provided your consent).

If we are unable to collect personal information from or about you, we may not be able to respond to your requests or enquiries, verify your identity and facilitate your investment with APIL.

### **Direct marketing**

We may use your personal information so we can contact you with information about our products and services, special offers, promotions and events that may be of interest to you

We may contact you by email, mail or telephone. You can let us know at any time if you no longer wish to receive these communications, by contacting us (using the contact details at the end of this policy) or using the unsubscribe facility in our communications.

### **Disclosure of personal information to third parties**

In conducting our business, we may disclose your personal information to third parties for the purposes outlined above. These third parties may include, where appropriate:

- your financial advisor
- financial institutions for payment processing
- our contracted service providers, including;
  - IT service providers
  - Fund administrators and Registry Services
  - Customer management software providers
  - marketing, promotional and market research agencies; and
  - external business advisers (such as auditors and lawyers); and
- in the case of a sale of our business (in whole or in part) to the purchaser (as an asset of the business)
- if you are a job applicant, referees whose details you provide to us.

We may also disclose your personal information to other third parties and for other purposes where we are required or authorised by or under law to do so (including where you have provided your consent).

APIL will not disclose your personal information to overseas recipients. Where we disclose your personal information to the third parties listed above, these third parties will also store your personal information in Australia.

### **How we hold personal information**

We generally hold personal information in computer systems, including computer systems operated for us by our service providers. We take reasonable steps to protect personal information from misuse, interference, loss, and unauthorised access, modification or disclosure. This includes taking appropriate security measures to protect electronic materials and requiring our service providers to do so

We store hardcopy files in offices, cupboards and filing cabinets within an access controlled premises. Under our records managements system, access to files is appropriately limited. We may apply additional security measures limiting access to information about files or store files in locked cupboards. We also store hardcopy files with an offsite storage provider whose premises and access is strictly controlled.

We store electronic records within our own secure network and through third party data storage providers. Personal information within our network is password protected and access is appropriately limited.

Our third party data storage providers are required to protect personal information in accordance with applicable laws and take appropriate technical and organisation measures against unauthorised or unlawful use of personal information or its accidental loss, destruction or damage.

### **Access to and correction of your personal information**

You have a right to request access to personal information that we hold about you and request its correction if it is inaccurate, out of date, incomplete, irrelevant or misleading. You may do so by contacting our Privacy Officer at the details below.

We will respond to all requests for access to or correction of personal information within a reasonable period.

We will generally provide you with access to your personal information (subject to some exceptions permitted by law) but may charge an access fee to cover the cost of retrieving the information and supplying it to you.

### **Complaints**

Please contact us (using the contact details at the end of this policy) if you have any concerns or complaints about the manner in which we have collected or handled your personal information. We will inquire into your complaint and respond within 30 days. If you are not satisfied with our response, you can contact us to discuss your concerns or lodge a complaint with the Australian Information Commissioner by visiting [www.oaic.gov.au](http://www.oaic.gov.au), calling 1300 363 992 or by emailing [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au).

### **Contact details**

If you would like more information about the way we manage personal information, would like to request access to or correction of personal information that we hold about you, or wish to make a complaint, please contact us by either:

Email – [info@apilgoup.com](mailto:info@apilgoup.com)

Attention – Company Secretary

Post - PO Box Z5192, St Georges Tce, Perth WA 6831

Telephone – 08 93803222

### **Changes to our privacy policy**

From time to time it may be necessary for us to review and revise our Privacy Policy. We may notify you about changes to this Privacy Policy by posting an updated version on our [website](#). We encourage you to check our website from time to time to ensure you are familiar with our latest Privacy Policy.

Our Privacy Policy was last updated in March 2023.