



Privacy Policy

Benchmark Property Partners Pty Ltd

1. Introduction

Benchmark Property Partners Pty Ltd (ACN 656 847 228), Benchmark Property RM Pty Ltd (ACN 670 596 344) and all of their related companies (**Benchmark Property**) understand the importance of protecting the privacy of your personal information. This policy explains how Benchmark Property aims to protect the privacy of your personal information, your rights in relation to your personal information managed by Benchmark Property and the way Benchmark Property and its employees collect, hold, use and disclose your personal information.

In handling your personal information, Benchmark Property will comply with the Privacy Act 1988 (Cth) (Privacy Act) with regard to the Australian Privacy Principles in the Privacy Act.

This Privacy Policy does not constitute a contractual representation, promise, guarantee or warranty by Benchmark Property to you as to the manner in which Benchmark Property will or may collect, store, use, disclose, protect or otherwise handle your personal information. Some matters are beyond the control of Benchmark Property, such as third party malicious or criminal attacks.

This policy may be updated from time to time.

2. What personal information does Benchmark Property collect?

Personal information is information or an opinion about an identified, or reasonably identifiable, individual. During the provision of its products and/or services, Benchmark Property may collect your personal information.

Generally, the kinds of personal information Benchmark Property collects are:

- (a) contact and identification information such as your name, address, telephone number and email address;
- (b) where you are acting on behalf of another entity (whether as an employee, director or other representative), details of that entity and your relationship with it;
- (c) other identification verification information, including photographic information and personal identification documents (including your passport, driver's licence, Medicare card);
- (d) financial information about your assets, occupation and income, account balances, account activities, payment history and transactions with us or third parties;
- (e) tax information including tax file number (TFN), tax returns and related information;
- (f) banking details;
- (g) professional and business information about membership of a professional association, partnerships, directorships, business names and trust arrangements;
- (h) information as required by the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth); and
- (i) other information you provide to us.

In some circumstances Benchmark Property may also hold other personal information provided by you.

3. How does Benchmark Property collect your personal information?

Generally, Benchmark Property collects your personal information directly from you, through the completion of a manual or online form, an interaction or exchange in person or by way of telephone, email, post or through the use of the Benchmark Property website. There may be occasions when Benchmark Property collects your personal information from other sources such as from:

- (a) an entity you represent (including but not limited to your employer or a company of which you are a director), where necessary for Benchmark Property to provide its products and/or services to that entity through you;
- (b) the completion of an application form by another person or entity that lists you as a director, guarantor or potential guarantor;
- (c) Equifax, DNB or other credit reporting body;
- (d) an information services provider;
- (e) a publicly maintained record or other publicly available sources of information including social media and similar websites; or
- (f) a government agency.

Generally, Benchmark Property will only collect your personal information from sources other than you if it is unreasonable or impracticable to collect your personal information from you.

Benchmark Property may also collect information about how you use our website through the use of 'cookies'. Cookies are small text files transferred from your browser to your computer so that Benchmark Property's systems can recognise your browser and record non-personal information such as the date, time or duration of your visit and the pages accessed. The intention of cookies is for administration, statistical and maintenance purposes and assists us with enhancing and tailoring your experience of our website.

No attempt is made by Benchmark Property to use information from cookies to personally identify you. However, should any information from cookies be linked with your personal information, it will be treated in the same manner as the personal information to which it is linked. You may disable the use of cookies through your internet browser.

4. Why does Benchmark Property need your personal information?

Benchmark Property collects, holds, uses and discloses your personal information where it is reasonably necessary for the purposes of:

- (a) providing to you our products and/or services;
- (b) assess the suitability of you or a related organisation for a debt facility or for participation in any equity or other investment;
- (c) prevent or investigate any actual or suspected fraud, unlawful activity or misconduct;
- (d) comply with any relevant laws, regulations, codes of practice and court orders; or
- (e) any other legal requirements.



Where personal information is used or disclosed, Benchmark Property takes steps reasonable in the circumstances to ensure it is relevant to the purpose for which it is to be used or disclosed. You are under no obligation to provide your personal information to Benchmark Property. However, without certain information from you, Benchmark Property may not be able to provide its products and/or services to you.

5. To whom does Benchmark Property disclose your personal information?

Benchmark Property does not sell, rent or trade personal information to, or with third parties. Benchmark Property discloses your personal information for the purpose for which Benchmark Property collects it. That is, generally, Benchmark Property will only disclose your personal information for a purpose set out at paragraph 4. This may include disclosing your personal information to:

- (a) external providers that perform services on behalf of Benchmark Property;
- (b) government departments or other regulatory authorities, when requested or required to do so;
- (c) Benchmark Property's lawyers, auditors and other advisors;
- (d) financial market and clearing and settlement facility operators;
- (e) current or potential investors, lenders or third-party credit providers;
- (f) insurance providers;
- (g) credit reporting agencies; and
- (h) third parties engaged to perform administrative tasks on behalf of Benchmark Property.

Benchmark Property's disclosures of your personal information to third parties are on a confidential basis and/or otherwise in accordance with law. Benchmark Property may also disclose your personal information with your consent or if disclosure is required or authorised by law.

6. Overseas disclosure

Benchmark Property may transfer your personal information to an entity which is in a foreign country to assist Benchmark Property in providing its products or services. For example, your personal information may be stored on servers located overseas by our third-party cloud storage providers, or it may be provided to current or potential non-resident investors or capital providers where the provision of our products or services requires the transfer of the information.

Overseas recipients may have different privacy and data protection standards. However, before disclosing any personal information to an overseas recipient, Benchmark Property will take steps reasonable in the circumstances to ensure the overseas recipient complies with the Australian Privacy Principles or is bound by a substantially similar privacy scheme unless you consent to the overseas disclosure or it is otherwise required or permitted by law. If you have any queries or objections to such disclosures, please contact our Compliance Officer on the details set out in paragraph 11.

7. Direct marketing

Benchmark Property may use your personal information to identify and inform you of products or services that may be of interest to you. At any time, you may opt out of receiving direct marketing communications from Benchmark Property. To do so, please contact our Compliance Officer with the details in paragraph 11. Unless and until you opt out, your consent to receive direct marketing communications from Benchmark Property and to the handling of your personal information for this purpose will continue.

8. Security of your personal information

Benchmark Property takes steps reasonable in the circumstances to ensure that the personal information it holds is protected from misuse, interference and loss and from unauthorised access, modification or disclosure. Benchmark Property holds personal information in electronic forms in secure databases on secure premises, accessible only by authorised staff.

Benchmark Property will destroy or de-identify personal information in circumstances where it is no longer required, unless Benchmark Property is otherwise required or authorised by law to retain the information.

9. How you may access and correct the personal information that Benchmark Property holds about you

You may contact Benchmark Property to request access to the personal information it holds about you at any time. You may also ask Benchmark Property to correct information about you that you may believe is inaccurate, incomplete or out of date. Please contact our Compliance Officer using the contact details set out in clause 11.

To obtain access to your personal information:

- (a) you will have to provide proof of identity to ensure that personal information is provided only to the correct individuals and that the privacy of others is protected;
- (b) Benchmark Property requests that you be reasonably specific about the information you require; and
- (c) Benchmark Property may charge you a reasonable administration fee, which reflects the cost to Benchmark Property, for providing access in accordance with your request.

In certain circumstances, Benchmark Property may refuse, or be unable, to correct or provide you with access to your personal information. In these circumstances, Benchmark Property will write to you to explain the reasons why this is the case.

10. Privacy complaints

Please direct all privacy complaints to our Compliance Officer. At all times, privacy complaints:

- (a) will be treated seriously;
- (b) will be dealt with promptly;



- (c) will be dealt with in a confidential manner; and
- (d) will not affect your existing obligations or affect the commercial arrangements between you and Benchmark Property.

Our Compliance Officer will commence an investigation into your complaint. You will be informed of the outcome of your complaint following completion of the investigation. In the event that you are dissatisfied with the outcome of your complaint, you may refer the complaint to the Office of the Australian Information Commissioner.

11. How to contact us

If you have any questions about this Privacy Policy or Benchmark Property's management of your personal information, please contact our Compliance Officer. Details are below:

Email: investors@benchmarkproperty.com.au

Phone: 0411 022 836

Address: 120B Underwood Street, Paddington, NSW 2021