

Aware Real Estate Group PRIVACY POLICY

Introduction

1. Aware Real Estate Group is committed to respecting and safeguarding the personal information of the individuals with whom it deals.
2. Aware Real Estate Group will only use personal information for the purpose specified or which is reasonably apparent at the time the information was collected, or for a related purpose for which the individual would reasonably expect it to be used.
3. The Aware Real Estate Group consists of Aware Real Estate Management Pty Ltd (**AREM**), Altis Real Estate Trust (**ARET**) and its sub-trusts and the trustee of ARET, Barings Australia Property Pty Ltd (**ARET Trustee**).

“Personal information” means any information or an opinion relating to 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 material form or not. An individual’s name, address and telephone number are examples of personal information.

Purpose

4. The purpose of this policy is to:
 - a. Confirm the general principles and methods by which personal information is collected, used, stored, and protected when it is provided to us.
 - b. Specify the roles and responsibilities for managing how personal information is collected, used, stored, and protected when it is provided to us.

General Principles and Methods

Compliance with laws and regulations

5. Aware Real Estate Group will comply with the Australian Privacy Principles contained in the *Privacy Act 1988* (Cth) (**Privacy Act**) to protect the personal information we collect and hold.
6. This Policy does not apply to certain types of information and data which are not covered by the Privacy Act, including certain employee records in relation to our current or former employees. However, where the personal information we have collected in relation to current or former employees is within the scope of the Privacy Act, this Policy applies to that personal information.

Collecting personal information and data

7. Aware Real Estate Group may collect and hold personal information including, but not limited to, where individuals:
 - a. Interact with us in a professional or commercial capacity, including as a customer, contractor or business partner.

- b. Lease, or indicate a desire to lease, properties or spaces, which may involve related guarantors, such as when negotiating, formalising, or seeking approval for leasing agreements with Aware Real Estate Group or properties under the management of Aware Real Estate Group.
 - c. Register or subscribe for electronic newsletters.
 - d. Enter an Aware Real Estate managed property that uses CCTV which may collect footage or licence plate details for safety and security purposes.
 - e. Seek employment with Aware Real Estate Group, or work for us as a contractor (for example information from background checks prior to commencement of employment).
 - f. Supply goods and services to Aware Real Estate Group.
 - g. Use Aware Real Estate's website or social media.
 - h. Otherwise interact with Aware Real Estate Group.
8. Personal information that is collected in paper-based documents may be converted to electronic form for use or storage (with the original paper-based documents either archived or securely destroyed).
9. We may also collect personal information from third party sources, for example:
- a. From business partners, including tenants, investors, airlines, travel agencies, reservation systems and third parties providing advertising, marketing, promotional or other services to us.
 - b. From entities or other parties investing or shareholding within the Aware Real Estate Group.
 - c. From an employer in the course of business or investment transactions with us.
 - d. From entities or other parties that individuals have authorised to disclose information to us; and/or from public agencies or other public sources.
10. Aware Real Estate Group will take all reasonable steps to provide a privacy collection statement at the time we collect personal information from you. This privacy collection statement will generally include details about the purpose of the collection, the entities that your personal information will be disclosed to, overseas recipients of your personal information (where applicable), and that this Policy contains information about how you may access your personal information held by Aware Real Estate Group and how you may make a complaint.

Types of personal information and data we collect

11. Aware Real Estate Group will only collect personal information that is reasonably necessary for us to conduct and operate our business, or where otherwise required by law. The types of personal information and data we collect may consist of:
- a. Name, address, email address, phone number, date of birth, payment details or any other information provided to us.
 - b. Information needed to verify an individual's identity such as their passport, driver's license or Medicare details.
 - c. Information from the use of our websites or other services including IP addresses and browsing history.
 - d. Information about how our products and services are used.
 - e. Employment and educational background, income levels and any other information related to an individual's employment.
 - f. Sensitive information, including medical health, criminal history, and ethnic and racial origin.

- g. Any other personal information that is disclosed to us by third parties listed in paragraph 9.

How we use personal information and data

12. Aware Real Estate Group will collect and use personal information for the efficient operation of our business and for the purpose it was collected. This may include:
 - a. To provide products and services and to send communications requested by individuals.
 - b. To answer enquiries and provide information or advice about existing and new products or services.
 - c. To perform operational business tasks, which may involve sharing personal information with our related bodies corporate, contractors, service providers, or other third parties.
 - d. For administrative, marketing (including direct marketing), strategic planning, product or service development, quality assurance, and research purposes related to Aware Real Estate Group, its affiliated entities, contractors, or service providers.
 - e. To provide updated personal information to our related bodies corporate, contractors or service providers.
 - f. To update our records and keep contact details up to date.
 - g. To process and respond to any complaint made by individuals.
 - h. As part of a sale or transfer of assets or other corporate transaction.
13. Aware Real Estate Group generally does not need to collect sensitive personal information to operate our business. However, occasionally may collect and use sensitive information, including medical health, criminal history, ethnic and ancestral heritage for the purpose of assessing an application for Employment at Aware Real Estate or an application for Hardship by one of our tenants.
14. We may employ personal information for other purposes as mandated or permitted by applicable laws (e.g., sharing with government regulatory and law enforcement agencies) or in emergency situations.
15. In cases where Aware Real Estate Group intends to utilise or disclose personal information for different reasons, we will obtain the individual's consent.
16. Individuals may request access to their personal information or request us to correct information that we hold by contacting us via the contact details set out at paragraph 25 below. Individuals may also ask us to delete or remove personal information that we hold in certain circumstances and withdraw consent to use their personal information. However, in some circumstances there may be legal, regulatory or administrative reasons to deny an access request.
17. In some circumstances we may anonymise personal information so that it can no longer be associated with a particular individual, in which case we are entitled to retain and use such data without restriction.
18. We do not sell personal information to entities outside the Aware Real Estate Group.

Storage and security of personal information and data

19. Aware Real Estate Group will employ reasonable security measures that are designed to prevent or mitigate unauthorised or unintended access to personal information and data: These measures will include:
 - a. Taking reasonable steps to protect the personal information and data we hold from misuse, loss, unauthorised access, modification or disclosure.

- b. Destroying or permanently de-identifying any personal information and data collected which is no longer required.
 - c. Requiring external organisations which provide support services to Aware Real Estate Group to appropriately safeguard the security of personal information and data collected, used and stored on our behalf.
20. Aware Real Estate Group stores information and data in paper-based files or electronic record keeping methods in secure databases (including trusted third-party storage providers based in Australia and overseas). We will, however, take reasonable steps to ensure that any overseas recipient will deal with any personal information disclosed by us in a way that is consistent with the Australian Privacy Principles.
21. Aware Real Estate Group will maintain physical security measures over its physical premises and paper data stores (including through locks and security systems at our premises), and a range of computer and network security measures over its electronic systems (such as systems access, user identifiers and passwords, multi-factor authentication, firewalls and data encryption while data is in transit and at rest).
22. Our websites will use encryption and other technologies to ensure the secure transmission of information via the internet. Notwithstanding our use of encryption or other technologies to ensure secure transmission of information, users of our websites are encouraged to exercise care in sending personal information via the internet.
23. We will retain personal information and data for the duration required to fulfil the purposes for which it was initially gathered and to meet our business and/or legal obligations as prescribed by applicable laws and regulations. This duration may vary depending on the nature of the information and data but typically falls within a range of 3 to 15 years, including considerations such as audit, accounting, or reporting requirements.

Complaints

24. You can make a complaint to the Head of Finance and Operations if you believe that we have breached our obligations under the Privacy Act or failed to comply with this Policy. Any complaint should be made in writing and sent to us using the contact details below:
- Tracey Whitby
Head of Finance and Operations
Email: whistleblower@awarerealestate.com.au
Ph 0407 071 721
25. Aware Real Estate Group takes privacy-related complaints very seriously. We will acknowledge receipt of your complaint within a week and endeavour to complete our investigation into your complaint promptly. First, we will consider your complaint to determine whether there are simple or immediate steps which can be taken to resolve the complaint.
26. If your complaint requires more detailed consideration or investigation, we may ask you to provide further information about your complaint and the outcome you are seeking. We will then typically gather relevant facts, locate and review relevant documents and speak with individuals involved.
27. In most cases, we will investigate and respond to a complaint within 30 days of receipt of the complaint. If the matter is more complex or our investigation may take longer, we will let you know.
28. If you are not satisfied with our response, or we have not responded to your complaint within 30 days, you can refer your complaint to the Office of the Australian Information Commissioner (OAIC) as follows:

- a. Phone: 1300 363 992
Web: www.oaic.gov.au
Address: GPO Box 5218 Sydney, NSW 2001

Roles and responsibilities

29. Roles and responsibilities for oversight and implementation of this policy are as follows:
- a. **Board:** responsible for approval and oversight of policy implementation.
 - b. **CEO:** responsible for implementation of this policy.
 - c. **Head of Finance & Operations:** responsible for directing and overseeing compliance with this policy.
 - d. **Function and Operations Leaders:** responsible for developing and maintaining personal data registers and allocating owners for confidential and sensitive information.
 - e. **Employees, Contractors and Business Partners:** responsible for familiarising themselves and maintaining their compliance with the general principles and permitted methods Aware Real Estate Group or its business partners for collecting, using, storing, and protecting personal information and data.

Breach of this policy

30. A breach of any obligations and expectations under this Policy will be reviewed and actions taken to learn from and adapt the business to prevent future instances.

Review

31. This policy will be reviewed at least annually by the AREM Board and amended as necessary.

Revision history

Version	Reason for amendment	Date approved	Approving body
1	New policy		AREM Board