

Abacus Privacy Policy

1. Scope

Abacus Group is subject to the Australian Privacy Principles (APPs). This policy is applicable to Abacus Group and its controlled entities (Abacus, we, us). This policy describes how Abacus complies with all privacy requirements in protecting all personal information Abacus holds about individuals, whether that information is provided in written form, orally or electronically.

You can obtain a copy of this policy from our website or by contacting us. Information about the APPs and your privacy rights is available at the Office of the Australian Information Commissioner at <https://www.oaic.gov.au/>.

2. Personal Information

Personal information is information or an opinion about an individual whose identity is apparent or can reasonably be ascertained from that material.

3. Collection of Personal Information

We collect information about individuals:

- who use our online services such as websites, social media, mobile applications and other relevant online services
- who register, login or subscribe or participate in our services
- who use our assets services such as connecting to wifi, hiring equipment (mobility aids) and purchasing gift cards
- who provide evidence or are involved in an incident at one of our properties
- who are tenants or prospective tenants
- who are prospective or current employees
- who invest in our entities, assets, products or services

- who we provide products or services to during the course of business.

The type of personal information Abacus collects and holds depends upon its dealings with relevant individuals Information includes:

- name, date of birth, gender and contact details including address(es), email address and telephone numbers;
- bank account and credit card details;
- identification documents such as drivers licence or passport;
- incident details recorded at each asset;
- enquiries, complaints and records of interactions;
- trust or fund name and documents;
- registration and activity details relating to our online services including date and time of access, IP addresses and URL where you accessed our website from;
- tax file numbers;
- ABNs, insurance details, guarantor details, bank guarantees and contact details;
- financial and trading information
- CCTV surveillance footage within our properties;
- investor information such as the number of shares you hold or seek, any power of attorney you grant, your tax file number if you choose to provide it and your Securityholder Reference Number (SRN) or Holder Identification Number (HIN);
- employee information such as tax file number, training records, police check, contact details, references, qualifications, employment history, emergency contact details, leave, superannuation details and health and safety information
- any information that is required to be collected by law or in the necessary course of business.

Abacus usually collects personal information directly from the individuals it deals with. However, Abacus may collect such information from third parties, for example:

- an individual's agent where this is reasonably necessary to allow Abacus to deal with the individual;
- public sources including social media; and
- the third parties listed below under 'To whom do we disclose Personal Information'.

Abacus does not generally collect sensitive personal information (including that relating to religious views, personal health, ethnicity or political opinion). However, in certain circumstances Abacus may



collect some sensitive information if it is reasonably necessary to allow Abacus to deal with the individual and the individual has provided consent to Abacus to do so, or the collection is otherwise lawful.

4. For what purpose do we collect Personal Information?

We collect personal information to allow us to provide, administer, improve and personalise our services, process payments, identify you, communicate with you (including marketing and investor communications), conduct promotions, maintain and update our records, investigate and deal with unlawful activity and misconduct, respond to information requests that are required by law, protect our lawful interests, facilitate business mergers, acquisitions and divestments, and deal with enquires and complaints.

We collect personal information under certain laws including the Income Tax Assessment Act and other tax laws, the Corporations Act, the ASX Listing Rules, Fair Work Act, Superannuation Guarantee (Administration) Act, occupational health and safety acts and workers compensation acts.

We are authorised to collect tax file numbers by certain tax and other laws. It is not compulsory for you to provide your tax file number in order to receive all of our services but, if you don't there may be impacts for you, for example tax law may require us to deduct tax from your distributions at the highest marginal rate.

We may use your personal information for direct marketing purposes. If you do not wish to receive marketing communications from us, you can let us know by e-mailing or telephoning us at the contact address below or opt out details are provided on all marketing communications.

5. Investors

Abacus registry is outsourced to an external service provider, Boardroom.

Boardroom has their own privacy policy detailing the collection, use, disclosure and management of personal information that Boardroom collects on our behalf. This information is used to carry our registry functions. A copy of their privacy policy is available at <https://boardroomlimited.com.au/>

6. To whom do we disclose Personal Information?

Personal information about an individual may be disclosed to third parties, such as the following:

- other Abacus entities;
- service providers to which Abacus outsources certain functions such as its securities registry and custodial services;



- consultants such as auditors, accountants and lawyers, insurance companies, property managers and estate agents;
- your and our representatives;
- regulatory authorities;

Some of these third parties may be located outside of Australia.

7. Cookies

Our web site may use cookies which allow us to identify your browser while you are using our site. Cookies do not identify you; they simply allow us to track usage patterns so that we can measure the level of interest in various areas of our site. Most web browsers are set up to accept cookies. You can re-set your browser to refuse all cookies or to receive a warning message with each cookie which you can then refuse by turning it off in your browser. See www.allaboutcookies.org for instructions on deleting and rejecting cookies for many common browsers.

Unless you provide an e-mail address in the course of your visit to our website, we cannot identify you.

8. The security of your Personal Information

We take a number of steps to protect the security of your personal information. Depending on the information and other circumstances, those steps may include security passes for access to our premises, network firewalls, access passwords on our computers and contractual protections where we use service providers to store information for us.

9. Updating and accessing your Personal Information

Abacus takes reasonable steps to correct personal information to ensure that, having regard to the purpose for which the information is held, it is accurate, up-to-date, complete, relevant and not misleading if either:

- Abacus is satisfied that it needs to be corrected, or
- an individual requests that their personal information be corrected.

If you become aware of, or believe at any time that information we hold about you is inaccurate, incomplete or outdated, you may contact us by any of the methods set out below and provide us with evidence of the inaccuracy, incompleteness or out datedness. We will, if we agree that the information requires correcting, take reasonable steps to correct the information.



You may also contact us if you wish to access your personal information held by us. We will endeavour to respond to any request for access within two to four weeks, depending on the complexity of the information or the request. Under the APPs, access can be denied in certain circumstances. We will give you our reasons for denying access if we do so. If the request is complex or time consuming, we may charge a fee for giving you access.

10. Data Breaches

A data breach occurs when personal information held by an entity is lost or subjected to unauthorised access, modification, disclosure or other misuse or interference. In the event of a suspected or actual data breach the processes in the Data Breach Response Plan should be followed.

11. Making a complaint

If you have a complaint about our treatment of your personal information, you should contact us by any of the methods set out below. Depending on the complexity of your complaint, we will usually aim to consider and respond to it within 7-30 days. We will use our best endeavours to resolve any complaint to your satisfaction. However, if you are not satisfied with our response, you are entitled to contact the Office of the Australian Information Commissioner who may investigate your complaint further.

Contacting us about privacy and your Personal Information

Address: Privacy Officer - Abacus Funds Management Limited, Level 13, 77 Castlereagh St, Sydney NSW 2000

Telephone: (02) 9253 8600

Facsimile: (02) 9253 8616

E-mail: privacyofficer@abacusproperty.com.au

Website: www.abacusproperty.com.au

12. Related legislation and policies

Privacy Act 1988 (Cth)

Data Breach Response Plan

13. Document Control

Effective: March 2014, 15 February 2018, 27 June 2022

Version: 3

