

Privacy Policy

Effective date	26 October 2017
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Approved by	Board
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Policy

Privacy is important to us. This statement outlines Frasers Property Australia (FPA)'s policy on how we manage the personal information we hold. The Policy applies to all divisions and organisations in the FPA group. It is FPA's policy to respect the confidentiality of information and the privacy of individuals. FPA is bound by the National Privacy Principles ('Principles') contained in the Commonwealth Privacy Act. The Principles are designed to protect the confidentiality of information and the privacy of individuals by regulating the way personal information is managed.

In summary, the Principles define 'personal information' as information or an opinion relating to an individual which can be used to identify that individual.

What kind of personal information do we collect?

The type of personal information we may collect and hold includes (but is not limited to) information about:

- ◆ customers, clients, tenants and suppliers;
- ◆ job applicants, employees, and contractors;
- ◆ shareholders; and
- ◆ other people who may come into contact with FPA or one of the divisions or organisations in the FPA group.

This information may be obtained by way of telephone or Internet enquiries or forms filled out by such individuals, face-to-face meetings, interviews, telephone conversations or from a third party (for example, a reference or sales agents acting on our behalf).

We may ask for other information voluntarily from time to time (for example, through market research or surveys) to enable us to improve our service or consider the wider needs of our customers or potential customers.

Exception in relation to Employee Records: FPA is not bound by the Principles in relation to FPA's treatment of an employee record, if the treatment is directly related to the current or former employment relationship between FPA and the employee.

How do we use this information and to whom may we disclose it? Our business is to understand and meet your needs and provide the services that you require. To do this effectively we need to collect a range of personal information about you.

FPA uses personal information for the primary purpose for which it is collected, or for secondary purposes which are related to the primary purpose.

In general, FPA uses personal information for the following purposes:

- ◆ to provide products or services that have been requested;

- ◆ to help us manage and enhance our products and services, including by analysing future customer needs;
- ◆ to communicate with you;
- ◆ to assess the suitability of prospective tenants;
- ◆ to provide ongoing information about our products and services to people that we believe may be interested;
- ◆ to comply with legal obligations; and
- ◆ recruitment of employees and contractors.

Depending on the product or service concerned, personal information may be disclosed to:

- ◆ other divisions or organisations within the FPA group;
- ◆ joint venture/ alliance partners;
- ◆ service providers and specialist advisers to FPA who have been contracted to provide FPA with agency, legal, administrative, financial, research or other services;
- ◆ other insurers, credit providers, courts, tribunals and regulatory authorities as agreed or authorised by law;
- ◆ credit reporting or reference agencies or insurance investigators; or
- ◆ anyone authorised by an individual, as specified by that individual or the contract.

We require that organisations outside the FPA group who handle or obtain personal information as service providers to FPA acknowledge the confidentiality of this information, undertake to respect any individual's right to privacy and comply with the National Privacy Principles and this Policy. We also require that these organisations use this information only for our purposes and otherwise follow our reasonable directions with respect to this information.

Sensitive information is subject to greater restrictions

Some personal information which we collect is 'sensitive'. Sensitive information includes a person's racial or ethnic origin, religion, membership of political bodies or trade unions, sexual preferences or activities, criminal record, state of health and medical history. The way we use tax file numbers and information received from a credit reporting agency about an individual is also restricted by law. Sensitive information, specifically health information, may be relevant to applications by prospective employees and while consent will be sought before this is obtained, we may not be able to adequately assess candidates' suitability for some positions without this information. The Principles require that sensitive information is used and disclosed only for the purposes for which it was provided, or a directly related secondary purpose, unless you agree otherwise or for other specific reasons such as if the use or disclosure of this information is required by law (for example, to prevent a crime or serious injury). Documents asking for sensitive information will explain this.

Management and security of personal information

We have appointed a National Privacy Compliance Officer to oversee our management of personal information in accordance with this policy and the Commonwealth Privacy Act. FPA trains its employees who handle your information to respect the confidentiality of customer information and your privacy. FPA regards breaches of your privacy very seriously.

How do we store personal information?

Safeguarding the privacy of your information is important to us, whether you interact with us personally, by telephone, mail, over the Internet or other electronic media. We hold personal information in a combination of secure computer storage facilities and paper based files and other records and take steps to protect the personal information we hold from misuse, loss, unauthorised access, modification or disclosure. The Principles also require us not to store personal information longer than necessary. Where we no longer require any personal information that it holds, that personal information should be destroyed or have details which may identify individuals removed.

How do we keep personal information accurate and up-to-date?

We endeavour to ensure that the personal information it holds about you is accurate and up-to-date. We realise that this information changes frequently with changes of address and other personal circumstances. We encourage you to contact us as soon as possible in order to update any personal information it holds about you. Our contact details are set out below.

You have the right to check what personal information about you is held by us

Under the Principles, you have the right to obtain a copy of any personal information which we hold about you and to advise us of any perceived inaccuracy. The Principles set out some exceptions to this. To make a request to access information we hold about you, please contact us in writing. We will require you to verify your identity and to specify what information you require. We may charge a fee to cover the cost of verifying the application and locating, retrieving, reviewing and copying any material requested. If the information sought is extensive, we will advise the likely cost in advance and can help to refine your request if required.

What if you have a complaint?

If you consider that any action of FPA breaches this Privacy Policy or the National Privacy Principles, you can make a complaint through one of the contacts below. We will endeavour to act promptly in response to a complaint. If you are not satisfied with our response to your complaint, you can phone the Commonwealth Privacy Commissioner's hotline on 1300 363 992.

How to contact us

You can contact us about a privacy-related issue by e-mail, phone, facsimile or post:

Attention Maria Vesic

E-mail maria.vesic@frasersproperty.com.au

Phone (02) 9767 2042

Postal address PO Box 3307, Rhodes NSW 2138

Updates to this Policy

FPA's Privacy Policy will be reviewed from time to time to take account of new laws and technology, changes to our operations and practices and the changing business environment. If you are unsure whether you are reading the most current version, please contact us.

Review of this Policy

This policy shall be reviewed by Chief Executive Officer and General Counsel as appropriate.