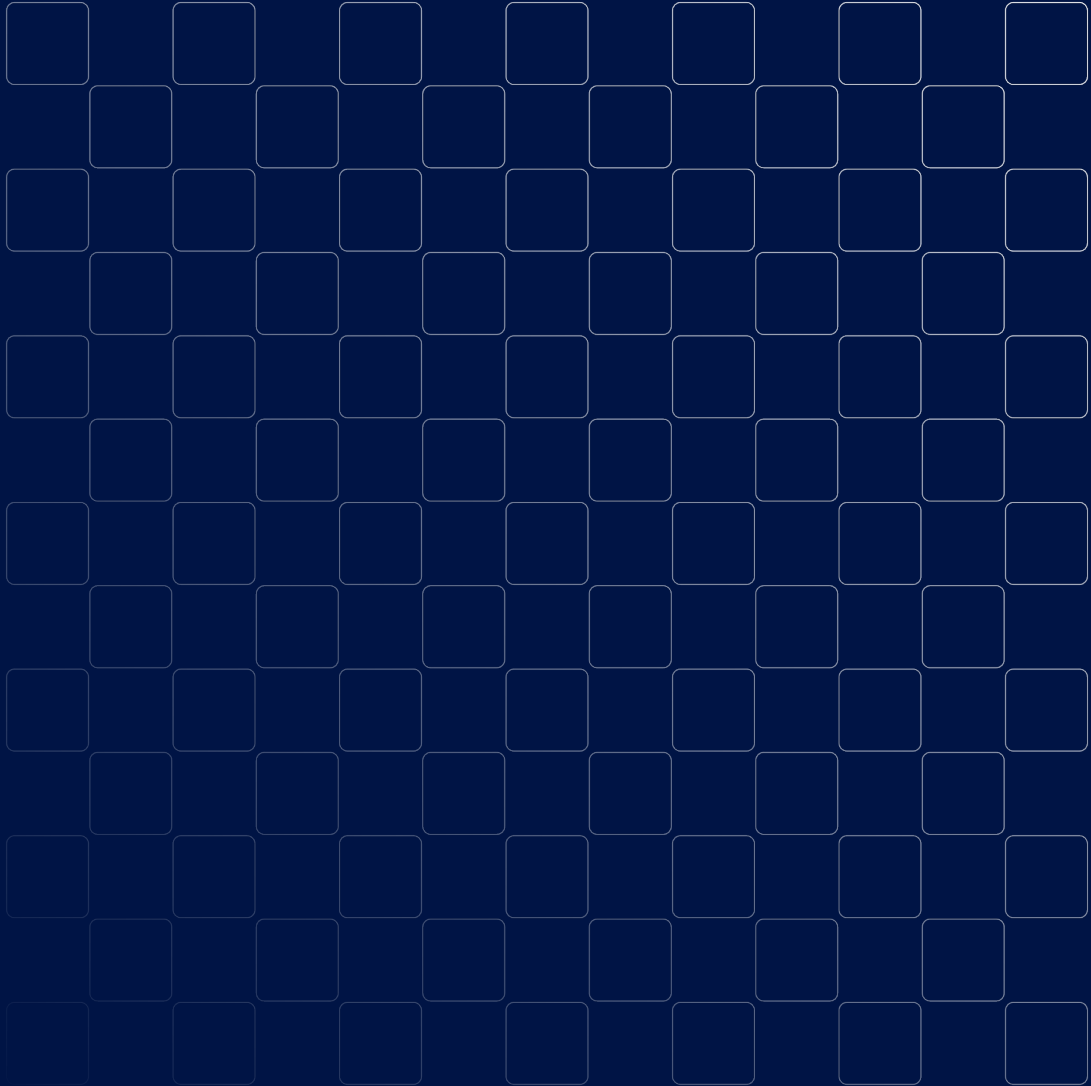


# Privacy Policy

## Qualitas Group

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## 1 Privacy is important to Qualitas

Qualitas Ltd ACN 655 057 588 is a company listed on the Australia Stock Exchange which controls a number of entities through which the group conducts its business, including Qualitas Investments Pty Ltd ACN 137 928 164 and Qualitas Property Partners Pty Ltd ACN 137 928 155 (collectively, “**Qualitas**”).

This Privacy Policy (“**Policy**”) sets out how Qualitas manages personal information, including sensitive information, that may be collected for one or more of the functions or activities of its core business or submitted to it through any of its websites or via any other means of collection.

This Policy applies to Qualitas and its directors, officers and employees (whether permanent, full-time, part-time or on a contractual arrangement), and to outsourced service providers which collect personal information on behalf of Qualitas.

This Policy is available on Qualitas’ website and to anyone who requests it, free of charge.

## 2 Australian Law

Qualitas is bound by the *Privacy Act 1988* (Cth) (“**Privacy Act**”) and guided by the Australian Privacy Principles (Schedule 1, Privacy Act) (“**Privacy Principles**”). Unless Qualitas has direct permission to do otherwise, it will only collect and use personal information as set out in this Policy. Qualitas takes the protection of personal information seriously.

## 3 Consent

Where Qualitas has collected personal information, it may use it for:

- the purpose that it was collected for and as set out in this Policy;
- related secondary purposes; and
- where permitted by the Privacy Principles.

Qualitas will obtain consent where otherwise required to do so by law.

There is no requirement to provide personal information. However, if the information requested is not provided, the services provided by Qualitas may be affected.

## 4 Personal information collected

In this Policy, ‘personal information’ means information or opinion about an identified individual, or an individual who is reasonably identifiable, whether true or not and whether recorded in a material form or not.

The type of personal information Qualitas collects and stores may differ for investors, customers, service providers and prospective employees, but may include the individual’s name, current address(es), date of birth, age or age group, occupation, bank account numbers, financial statements, tax information or ancillary information (including government related identifiers such as tax file numbers and Medicare details), information about previous transactions and dealings with Qualitas, information on an individual’s source of wealth, email address, telephone/mobile phone number, fax number and personal correspondence, which includes emails.

Qualitas may collect personal information through its website and through communication (either by email, telephone, in writing or in person). It may also collect personal information about an individual from third party administrators or service providers.

Applicants for possible employment positions with Qualitas may be asked for personal information including qualifications, skills, experience and character and Qualitas will conduct screening checks (including reference, background, directorship, financial probity, identity, eligibility to work, vocational suitability and criminal record checks (which is sensitive information)).

When lending to borrowers, Qualitas may collect tax returns or financial position statements which contain personal information. To the extent that government related identifiers (as defined in the Privacy Act) are collected, such as a tax file number, use or disclosure of such information will only be in accordance with the Privacy Act and the Privacy Principles.

## **5 Why personal information is collected, used and disclosed**

Qualitas offers various investment products and services to its investors and financing or capital solutions to potential clients. Qualitas strives to meet the needs of prospective investors and clients with product information and services.

Qualitas collects personal information for the purpose of:

- a. keeping records of its transactions for business purposes or to enable it to respond to concerns;
- b. improving its products or services;
- c. the general management and conduct of its business, internal accounting and administration;
- d. supplying it with information about investment accounts with Qualitas including regular statements;
- e. responding to inquiries;
- f. enhancing investor or client relations and investment opportunities;
- g. in relation to prospective employees, assessing applications, conducting screening checks and considering and contacting other persons about the applicant;
- h. in relation to the representatives of prospective clients who provide personal guarantees, assessing the viability of a proposed investment, conducting bankruptcy and credit checks and making related enquiries;
- i. providing updates or changes to the product or service acquired;
- j. providing information about Qualitas and its investment opportunities;
- k. analysing website usage and helping it to improve the structure, layout and usability of its website and enabling participation in any interactive features of its website; and
- l. complying with its legal obligations.

Personal information will not necessarily be made available to all of Qualitas' staff. Access to personal information will generally be restricted to those staff who require the information for the purposes set out above.

Where possible, personal information will only be used or disclosed for the primary purpose for which it was collected (or a related purpose) unless consent is provided to that other purpose of which Qualitas is permitted to do so by law. In certain circumstances, Qualitas may disclose personal information for a secondary purpose (see section 7 of this Policy). Occasionally Qualitas requires external organisations to provide a service for purposes which are necessary to conduct the functions or activities of its core business. Qualitas will take such steps as are reasonable in the circumstances to ensure these organisations both inside and outside of Australia deal with personal information in accordance with this Policy and the Privacy Principles. The organisations to whom Qualitas discloses personal information may be located outside Australia. It is not practicable to identify the countries in which recipients are likely to be located. Qualitas may from time to time use certain personal information as part of improved investor relations or for direct marketing purposes that they think will be useful. Qualitas may contact individuals by mail, telephone, email or SMS. Any marketing communications will include details of how to opt-out.

## **6 Websites**

The type of information collected when visiting the Qualitas website includes an individual's IP address, the date and time of visit, the pages accessed and the documents retrieved (although information about activity on Qualitas' website is not used to identify anyone personally, unless required by law) and the type of browser used.

When visiting Qualitas' website, its server may attach a small data file known as a "cookie" to the visitor's hard drive. This enables Qualitas to analyse usage patterns on its website in order to tailor it to its users' needs. The cookies used on Qualitas' website only identify a computer to its servers when an individual visits its website and is not linked to particular individuals unless required by law. Most web browsers are set to accept cookies. If an individual does not wish to accept cookies, the transfer of cookies can be refused by the computer's hard drive by adjusting internet browser settings.

Qualitas' website and emails may contain links to other websites that are not owned by Qualitas. Qualitas does not control these websites or any of their content. This Policy does not extend to use of these websites and individuals should refer to the respective privacy policies of such websites.

## **7 Secondary purpose**

Qualitas may also use or disclose personal information for purposes other than the purpose for which it was collected (being a secondary purpose) in certain circumstances, including where it would reasonably be expected to disclose the information for that purpose. Qualitas can (and each individual consents and authorises it to) disclose any information about that individual for a secondary purpose listed below, as permitted under the Privacy Principles:

- a. where an individual would reasonably expect the secondary use or disclosure, and that is related to the primary purpose of collection or, in the case of sensitive information, directly related to the primary purpose;
- b. when disclosure is required or authorised by or under an Australian law or a court or tribunal order;
- c. to lessen or prevent serious threat to an individual's health and safety or to public health or safety;
- d. to take appropriate action where it has reason to suspect that unlawful activity, or misconduct of a serious nature, that relates to its business functions or activities has been, is being, or may be engaged in;
- e. to assist another entity, body or person to locate an individual who has been reported as missing;
- f. for the establishment, exercise or defence of a legal or equitable claim;
- g. for the purposes of a confidential alternative dispute resolution process; and
- h. for one or more enforcement related activities conducted by, or on behalf of, an enforcement body.

Qualitas will act reasonably when deciding whether to make a disclosure of personal information under the Privacy Principles.

Qualitas does not sell personal information.

## **8 Security and retention of personal information**

Qualitas takes such steps (if any) as are reasonable in the circumstances to keep personal information secure in a combination of secure computer storage, hard copy files and other records to protect the personal information held from misuse, interference, loss, unauthorised access, modification or disclosure.

Qualitas is bound by laws in Australia to ensure that records are kept and accessible for certain periods, including the *Corporations Act 2001 (Cth)*, *Income Tax Assessment Act 1997 (Cth)*, *Privacy Act 1988 (Cth)*, *Electronic Transactions Act 1999 (Cth)*, *Crimes (Document Destruction) Act 2006 (Vic)*, *Evidence Act 1995 (Cth)* and *Financial Management and Accountability Act 1997 (Cth)*. Records must be retained for the minimum retention periods as outlined in the Qualitas Group, Data and Document Management Policy and Guidelines.

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

An individual has the right to access personal information provided to Qualitas by contacting Qualitas using the details below (subject to certain legal exceptions). If an individual requires details of their personal information held by Qualitas, Qualitas will need to verify the individual's identity before meeting the request, which will be processed in a reasonable time. Qualitas will take such steps as are reasonable in the circumstances to give access in a way that meets the needs of both Qualitas and the individual. In some circumstances under the Privacy Act and other legislation, Qualitas may decide not to provide an individual with the access requested (for example, if it is unlawful to give the individual access or the request is frivolous or vexatious). If a legal exception applies and Qualitas decides not to provide that individual with access to any personal information held about them, Qualitas will advise that individual of the outcome of the decision.

Qualitas is committed to ensuring the continued accuracy of all personal information held by them (having regard to the purpose of the use or disclosure). To assist Qualitas, please ensure that the information provided to Qualitas is accurate, up-to-date, and complete. At any time while Qualitas holds an individual's information, Qualitas may ask the individual to tell Qualitas of any changes to their information. Alternatively, if an individual believes that any information Qualitas holds about them is inaccurate, out-of-date, incomplete irrelevant or

misleading and needs to be corrected or updated, please contact Qualitas using the details below. Qualitas will take such steps as are reasonable in the circumstances to correct it and notify any related bodies corporate of the corrections. If Qualitas does not agree to change the personal information held about that individual, and that individual still believes that it is inaccurate, out-of-date, incomplete, irrelevant or misleading, they may ask Qualitas to attach a statement to this effect to the record. If Qualitas decides not to correct an individual's information, it will give the individual reasons for its decision.

If Qualitas holds personal information that is no longer needed, they will take steps as are reasonable in the circumstances to remove any personal identifiers and de-identify that personal information or they will ensure the secure destruction of the personal information. However, Qualitas may have commercial or legal obligations to maintain records for a minimum period (e.g. identification information may be retained in accordance with the *Anti-Money Laundering and Counter-Terrorism Financing ("AML/CTF") Act 2006* (Cth)).

## 10 **GDPR**

If an individual is in the European Union ("**EU**") (including the European Economic Area), the collection and processing of their personal information will be subject to the General Data Protection Regulation (2016/679) ("**GDPR**"). In providing services to the individual, Qualitas may collect and process personal information as outlined in this Policy. Otherwise, including for individual users of its services, Qualitas will be a data controller for the purposes of the GDPR and this Policy includes information that must be provided to an individual when Qualitas collects its personal information.

## 11 **Changes to Qualitas' privacy statement**

From time to time, it may be necessary for Qualitas to review and revise this Policy, in whole or in part. Qualitas reserves the right to change its policy at any time and to provide notice by publishing an updated version on Qualitas' website. Any changes will be effective immediately upon the posting of the revised policy on Qualitas' website. By continuing to access Qualitas' services following any changes and subject to the requirements of law, an individual will be deemed to have agreed to such changes.

## 12 **Lodging a complaint and how to contact Qualitas**

If you have any queries in relation to this Policy, or you would like to make a request to access or correct personal information or to make a complaint in relation to Qualitas' handling of personal information, please contact:

Qualitas Property Partners Pty Ltd

Level 41, 101 Collins Street

Melbourne VIC 3000

P + 61 3 9612 3900

LegalNotices@qualitas.com.au

Qualitas will acknowledge receipt of your complaint as soon as possible after receiving your complaint. Qualitas will review any concerns or complaints and respond to them within a reasonable period of time (usually 30 days). If they are unable to satisfactorily resolve your concern or complaint, you can contact the Office of the Australian Information Commissioner (**OAIC**) using the details below. The OAIC has the power to investigate the matter and make a determination (but may not do so unless you have first set out your complaint to Qualitas in writing).

Phone: 1300 363 992 (if calling from outside Australia including Norfolk Island please call: +61 2 9942 4099)

Post: Office of the Australian Information Commissioner, GPO Box 5288, SYDNEY NSW 2001

Fax: +61 2 6123 5145

Visit the OAIC 'Contact us' page at <https://www.oaic.gov.au/about-us/contact-us/> for information on hearing or speech assistance, translating and interpreting services, and online enquiry and complaint forms.

# QUALITAS

For more information  
please get in touch:

P: +61 3 9612 3900

E: [legalnotices@qualitas.com.au](mailto:legalnotices@qualitas.com.au)

[qualitas.com.au](http://qualitas.com.au)

## Melbourne

Level 41, 101 Collins Street  
Melbourne VIC 3000

## Sydney

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Sydney NSW 2000

## Brisbane

Level 14, 167 Eagle Street  
Brisbane QLD 4000