

GPV Property Pty Limited Privacy Policy

1. Context

GPV Property respects the personal information we hold about individuals. This policy describes how that information is handled and maintained in accordance with Australian Privacy Principles.

Personal information for the purposes of this policy is information about and which identifies individuals, whether that information is obtained from the relevant individual or from a third party.

2. Personal information we collect

As a licensed wholesale fund manager, GPV Property is required by legislation and regulations to collect and hold personal information in relation to investors in our financial products. This information is also an essential requirement in the conduct of our business to service our investor clients. The personal information we collect includes the following:

- Name, address and contact details;
- Investment information about your holdings in our products;
- Bank account details for direct crediting of investment distributions; and
- Tax file numbers (TFN) for disclosures required to the Australian Taxation Office.

3. How we collect personal information

We only collect personal information that you have knowingly provided that information to us or authorised a third party (such as your financial advisor) to provide to us. Generally, the process for collection of personal information will be via your response to a Disclosure Statement and completion of associated application forms, or by completion of forms associated with qualification as a wholesale investor and requests to be added to our distribution list for investment offers. The information may be provided to us by email, facsimile or post. From time to time additional or updated personal information may be collected through one or more of these methods or via telephone follow up.

4. How we use personal information

We only collect, maintain and use personal information about you if it is necessary for us to appropriately provide to you the services you have requested including:

- To establish and maintain your investment in our funds;
- To provide updates on the activities and performance of funds in which you have invested;
- To provide investor-specific reports associated your investments such distributions statements; and
- To meet regulatory requirements associated with managed investments (e.g. TFN collection).

We may also use personal information for other reasons such as:

- Monitoring and evaluating our products and services;
- Helping to improve our internal policies and procedures; or
- Providing you with information about other services and products you may be interested in.
(unless you tell us you prefer not to receive this information)

5. How and when we disclose personal information

We will not use or disclose personal information collected by us for any purpose other than:

- The purposes for which it was provided, and related purposes only in circumstances where you would reasonably expect such use or disclosure (e.g if you have invested in a GPV Property fund we may provide you with information on other investment opportunities with GPV Property);
- In circumstances where Australian Privacy Principles authorise use or disclosure as required or authorised under Australian law; or
- Where you have expressly consented to such disclosure.

We will **not** sell or otherwise provide personal information to other parties for direct marketing purposes.

We are obliged pursuant to legislation including the Corporations Act and the Anti-Money Laundering and Counter-Terrorism Financing Act to maintain certain transaction records and make those records available for inspection by the relevant government authorities.

We may disclose your personal information to external contractors for the following purposes;

- Storing information on managed investment scheme investor registers;
- Preparation of investment scheme annual accounts and tax returns;
- Audit of investment scheme accounts and registers; or
- Compliance plan review.

It is a condition of our agreement with each of our external contractors that they adopt and adhere to this privacy policy. We will confirm with external contractors that they have systems and procedures for handling personal information in accordance with this policy.

6. How we store personal information

We will at all times seek to ensure that the personal information collected and held by us is protected from misuse, loss, unauthorised access, modification or disclosure. At all times your personal information will be treated by us as confidential.

Your personal information is generally held on a computer based registry system. All computer-based information is protected through the use of authorised user access lists and the use of access passwords for each authorised user.

We may store your information in cloud or other types of networked or electronic storage, which may be physically located in overseas data centres. We will use reasonable endeavours to ensure that such service providers have appropriate security systems and do not breach Australian Privacy Principles. If your information is stored in this way, disclosures may occur in countries other than in Australia. Overseas organisations may be required to disclose information held by them under a foreign law.

In the event you cease to be a client of GPV Property, any personal information which we hold about you will be destroyed after an appropriate period of time that complies with legislative and professional requirements (usually seven to ten years).

7. Access to personal information

You may at any time, by contacting us by any of the methods detailed below, request access to your personal information and we will (subject to the following exceptions) provide you with access to that information either by providing you with copies of the information requested, allowing you to inspect the information requested, or providing you with an accurate summary of the information held. We will, prior to providing access in accordance with this policy, require you to provide evidence of your identity.

We will not provide you with access to personal information if:

- Providing access could be considered to pose a serious threat to the life or health of a person;
- Providing access would have an unreasonable impact on the privacy of others;
- The request for access is frivolous or vexatious;
- It relates to legal proceedings and would not be discoverable in those proceedings;
- Providing access would be unlawful; or
- Denying access is required, or authorised by or under law.

We will endeavour to respond to any request for access within 7 to 14 days depending on the complexity of the information and/or the request. If your request is urgent please indicate this clearly. In the event we refuse you access to personal information, we will provide you with an explanation for that refusal.

8. Correction of personal information

We will endeavour to ensure that, at all times, the personal information we hold is up to date and accurate. In the event that you become aware, or believe, that any personal information which we hold about you is inaccurate, incomplete or outdated, you may contact us by any of the methods detailed below and provide to us evidence of the inaccuracy or incompleteness or of any outdated information. If we agree that the information requires correcting, we will take all reasonable steps to correct the information as soon as practicable and notify you when the correction has been implemented.

9. Complaints about personal information

If you wish to complain about any breach or potential breach of this privacy policy or the Australian Privacy Principles, you should contact us by any of the methods detailed below and request that your complaint be directed to the Privacy Officer. Your complaint will be considered within seven days and responded to. It is our intention to use our best endeavours to resolve any complaint to your satisfaction, however, if you are unhappy with our response, you are entitled to contact the Office of the Privacy Commissioner who may investigate your complaint further.

If you have concerns about the information we hold about you, or would like to access the information, please email our fund administration team at: admin@gpvproperty.com.au or alternatively write, or visit us at Suite 207, 99 Pacific Highway, Charlestown, NSW, 2290.