

PRIVACY POLICY

REAL ESTATE SERVICES BY MIRVAC

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1.0 Introduction

HPRE Pty Ltd as trustee of the HPRE Unit Trust, trading as Real Estate Services by Mirvac (**HPRE**) and MLJV Pty Ltd as trustee of the Mirvac Lucas Real Estate Unit Trust, trading as Real Estate Services by Mirvac (**MLJV**) (each and together referred to as **RESBM**) is subject to the Australian Privacy Principles contained in the Privacy Act 1988 and the Privacy Amendment (Enhancing Privacy Protection) Act 2012.

The purpose of this Policy is to describe how RESBM complies with the privacy requirements in protecting the personal information RESBM holds about individuals.

2.0 Personal Information

Personal information is defined as information or an opinion about 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 a material form or not.

3.0 Collection of Personal Information

The type of personal information that RESBM collects will depend upon what dealings the relevant individual may have with RESBM.

RESBM may collect and hold personal information about individuals who:

- purchase, or express an interest to purchase, a Mirvac home or apartment (for example, when entering into a sale and purchase agreement, or when responding to requests for information about a Mirvac home or apartment);
- use RESBM's services, as the owner of a Mirvac home or apartment;
- lease, or express an interest to lease, premises or spaces, including any related guarantors (for example, when negotiating, entering into or applying to enter into a lease with Mirvac property owners);
- supply goods and services (for example, when establishing records and systems to enable payment for goods);
- seek employment with RESBM or are RESBM employees (for example, when conducting background checks for the purposes of employment);
- register or subscribe to join RESBM programs, newsletters or competitions;
- use RESBM's websites, social media and other online services; or
- may otherwise come into contact with RESBM.

RESBM only collects personal information which is reasonably necessary for its dealings with the relevant individual. The types of personal information may include, but are not limited to:

- information that identifies the individual (for example, name, gender, address, contact details, date of birth, photographic or video images);
- information about the individual's financial position and credit-worthiness;
- information about the individual that is required or authorised by law;
- the individual's tax file number;
- the individual's opinion about RESBM's products, services or staff.

The Privacy Act imposes restrictions on collecting sensitive personal information such as information about religious views, ethnicity, political opinions and personal health. RESBM generally does not collect sensitive personal information about an individual. However, in certain circumstances, RESBM may collect some sensitive information if it is necessary to allow RESBM to deal with the individual and provided the individual has given consent for RESBM to do so.

Whenever it is reasonable and practical to do so, RESBM only collects personal information directly from the individual. In some circumstances, personal information may be provided to RESBM by other parties such as RESBM's authorised agents and subcontractors. RESBM will take reasonable steps to inform the individual that it has the individual's personal information, unless it is obvious from the circumstances.

4.0 Notification of Collection of Personal Information

When RESBM collects personal information, RESBM will generally provide notification of the collection to the individual to inform the individual about the purpose for the collection, the types of entities that the information is disclosed to, the overseas recipients the information is disclosed to (where applicable), and that the RESBM Privacy Policy contains information about how the individual may access the personal information held by RESBM and how the individual may make a complaint.

5.0 Use and Disclosure of Personal Information

RESBM's policy is only to use personal information for the purpose which was either specified or reasonably apparent at the time when the information was collected. RESBM may also use or disclose the information collected for any other related purpose for which the individual would reasonably expect it to be used.

If RESBM wishes to use or disclose the personal information in other circumstances, it needs to obtain the individual's consent to do so.

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

- providing products or services that have been requested;
- communicating with the individual;
- identifying owners, landlords, and prospective purchasers and tenants and verifying identities; • identifying premises and verifying premises;
- advertising premises;
- processing applications for lease, and assessing prospective tenant's ability to comply with lease obligations;
- negotiating and preparing contracts for sale and leases and arranging signing of these agreements; • liaising and exchanging information with owners, and prospective and actual purchasers and tenants and their legal and other advisors in relation to sales and leases of premises;
- managing leases and premises, including collecting rent and preparing required statements of accounts and liaising with goods and services providers in relation to premises;
- confirming whether owners and landlords are registered for GST purposes;
- operating controlled money accounts;
- complying with applicable laws;
- complying with dispute resolution processes;
- helping RESBM manage and enhance its products and services, including analysing customer feedback and future customer needs;

- providing ongoing information and marketing about products and services to individuals that RESBM believes may be interested and where the individual has signed up;
- complying with regulatory and legal obligations;
- recruiting employees and contractors; or
- fulfilling its obligations to employees.

6.0 Disclosing Personal Information to Other Parties

RESBM may disclose personal information to other entities within the RESBM.

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External parties may be given access to personal information held by RESBM in certain circumstances. These include, but are not limited to:

- RESBM's contractors and service providers who assist RESBM in the operation of its business or to provide a customer service (for example, a company which helps maintain RESBM's computer systems or sends out RESBM's mail, other goods and services providers, advertising and media organisations, property data service providers, insurers, legal and other advisers, tradespeople, and payment providers);
- other third parties that RESBM needs to provide the personal information in the operation of its business (for example, property owners, landlords, prospective and actual purchasers and tenants, referees, mortgagees, head- lessors, RESBM's existing and prospective clients, strata owners, corporations, valuers, government and statutory bodies, financial institutions and third party operators of tenancy and other databases);
- the Australian Securities Exchange, the Australian Securities and Investments Commission and to other government agencies as agreed to or required by law;
- anyone authorised by a provider of personal information;
- relevant parties in situations when RESBM is required by law to provide the information.

In addition, if you are a tenant and you fail to comply with your lease, then that fact and your other personal information may be disclosed to third party operators of tenancy and other databases, other agents, courts and relevant tribunals.

RESBM limits the information disclosed to external parties to what is required for them to know in the operation of RESBM's business, or what is required by law.

From time to time, RESBM may disclose personal information to external parties located outside Australia to allow the external parties to perform their services for RESBM. These currently include organisations located in the countries listed in the Appendix. RESBM will only disclose personal information overseas when it is necessary for the services provided by these external parties and when it is in accordance with the Australian Privacy Principles. This includes taking reasonable steps to ensure that the external party has appropriate data handling arrangements in place.

RESBM does not sell personal information to third parties.

7.0 Marketing

RESBM may send marketing materials to its customers or potential customers where RESBM has collected the personal information from the individual and the individual would reasonably expect RESBM to use the information for that purpose.

The individual's prior consent will be obtained before RESBM sends the individual electronic marketing messages, or where personal information is otherwise used for marketing purposes in situations where the personal information has been collected from the individual and the individual would not reasonably expect RESBM to use the information for that purpose, the personal information has not been collected directly from the individual or where sensitive information is involved.

If the customer no longer wishes RESBM to use his or her personal information in order for RESBM to provide marketing materials, the customer is to advise RESBM via the relevant method provided for in the electronic marketing message sent to the customer or to write to the RESBM Privacy Officer (refer to contact details below). RESBM will act and amend its records promptly.

8.0 Applying for Employment with RESBM

RESBM collects personal information from individuals who submit applications or register interest for employment with RESBM. If the application is unsuccessful, RESBM may retain the information in case a more appropriate opportunity becomes available. The unsuccessful applicant will be advised that they can contact RESBM to request RESBM not to retain the applicant's information.

9.0 Security of Personal Information

RESBM will take reasonable steps to protect personal information that it holds from unauthorised access, modification, misuse, interference and loss. RESBM maintains physical security measures over its physical premises, and a range of computer and network security measures (such as systems access, firewalls, data encryption) over its electronic systems. RESBM employees are required to maintain the confidentiality of any personal information held.

If other parties provide support services, RESBM generally requires them to agree to appropriately protect the privacy of the information provided to them.

10.0 Access to Personal Information

Any individual can request access to the personal information RESBM may hold about them. To obtain access to the information, the individual needs to write to the RESBM Privacy Officer (refer to contact details below). RESBM will require evidence to verify the identity of the individual.

This service is free of charge unless the personal information requested requires preparation time. In this situation, RESBM will provide an estimate of how much this service will cost and request agreement before proceeding.

In normal circumstances, RESBM will provide the individual with access to the individual's personal information. However, in some circumstances, there may be legal, regulatory or administrative reasons to deny the requested access. If access is denied, RESBM will provide the individual with the reasons for doing so.

11.0 Changing Personal Information

If an individual wishes to change personal information that the individual believes may be inaccurate, out of-date, incomplete, irrelevant or misleading, the individual may write to the RESBM Privacy Officer requesting the information to be changed.

If RESBM disagrees with the individual that the personal information should be changed, RESBM will provide the individual with the reasons for doing so. The individual has the right to request that a notation be included with their personal information to indicate their disagreement with their personal information held by RESBM.

12.0 Collection of other information

RESBM may also collect the following information about you:

- A cookie is a small data file that may be placed on the computer of a web user (usually in the browser software folder) during a visit to a RESBM website. Cookies are necessary to allow the RESBM website and the user's computer to interact effectively and enhance security. Cookies can record information about the user's visit to assist RESBM in better understanding the needs of the user. For example, user traffic data may be collected and used to infer the website user's demographic using various web analytic technologies.
- RESBM sometimes also use performance tracking technology (such as conversion tags) to help RESBM to track user behaviour on its websites. Such user traffic and performance tracking data is non personally identifying and is collected on an aggregate level to report statistics to assist RESBM to improve the quality and relevancy of its services.

If users of the RESBM website do not wish to receive any cookies, they should set their browser to refuse cookies but this means that they may not be able to use the RESBM website.

13.0 Changes in the Future

RESBM reserves the right to change this Policy at any time. RESBM will notify any changes to this Policy by posting an updated version of the Policy on the RESBM website at <https://www.resbymirvac.com/>.

14.0 Complaints

An individual can make a complaint about the way in which RESBM has handled an individual's personal information by writing to RESBM at the contact details in section 15. RESBM will endeavour to act promptly in response to a complaint.

You may also contact the **Office of the Australian Information Commissioner** as follows: Phone 1300 363 992

Web www.oaic.gov.au

Address GPO Box 5218

Sydney, NSW 2001

15.0 Contacting RESBM

RESBM can be contacted as follows:

Company:HPRE

Phone: 02 8588 8888

Email: matthew.matthews@resbymirvac.com

Address: Matthew Matthews

HPRE Pty Ltd

Matthew.matthews@resbymirvac.com

Company: MLJV

Phone: 03 9645 1199

Email: matthew.matthews@resbymirvac.com

Address: Matthew Matthews

MLJV Pty Ltd

matthew.matthews@resbymirvac.com

16.0 Additional Information on Privacy

For further information about privacy issues and the protection of privacy, visit the Office of the Australian Information Commissioner's website at <http://www.oaic.gov.au>.

17.0 Approved and Adopted

This policy was approved and adopted by RESBM on 1 April 2019.

Appendix - Disclosure to other countries

Updated 1 April 2019

Personal information may be disclosed to third parties performing services for RESBM located in the following jurisdictions:

- for services performed for HPRE, there are no jurisdictions in which personal information may be disclosed; and
- for services performed for MLJV, personal information may be disclosed to third parties performing services