



PRIVACY POLICY

Australasian Property Investments Ltd (APIL) is committed to providing professional services and respecting the privacy of your personal information. We are bound by the Australian Privacy Principles under the Privacy Act 1988.

This policy explains how APIL will collect, store, verify, use and disclose the information we hold about you and the conditions under which your information may be accessed.

Collection of Personal Information

APIL collects and maintains personal information that is necessary to enable us to deliver our services or products or otherwise for our primary business functions and/or activities.

In the normal course of our business we only collect information about you when you provide it to us or it is provided to us under your authority.

We will collect personal information directly from you when you apply for a product or a service which we are obliged by to do by law prior to providing you with a product or service.

On occasions we may collect personal information about you from third parties, for example electronic identity verification providers, credit reporting agencies, share registries or regulatory authorities.

Information that we collect will be limited to that required to provide you with our services.

What type of information does APIL hold?

The type of information we collect and hold about you varies depending on the type of product or service you require.

For individuals investing in APIL products, we collect information that enables us to provide the chosen investment product. This information includes names, address', contact details, and may include (depending on the product), trust or fund name, bank account details for income distributions by direct credit and tax file numbers.

APIL primarily collects personal information via application forms which are received directly.

Occasionally, we collect information through telephone or e-mail enquiries about our products. Any changes or updates to the personal information that we hold will be retained.

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Failure to provide the personal information referred to above may expose you to higher risks in respect of the recommendations made to you and may affect the adequacy or appropriateness of advice we give to you.

We will only collect, maintain and use your Personal Information to adequately provide the services you have requested.

If we have received information that is not required to provide services to you, we will either advise you that we hold this information or destroy it.

Other purposes for which we may need to collect and use your personal information will include:

- To comply with legislative and regulatory requirements (including the AML/CTF 2006 Act);
- To enable us to perform administrative operations such as accounting, record keeping, and archival retrieval;
- To enable us to contact you when conducting marketing and inviting you to events that you may be interested in; and
- Tell you about new services and/or products we can offer (unless you tell us not to contact you with this type of information).

You may choose not to provide us with your personal information. In this case we would not be able to deal with you including providing a financial product. Under the AML/CTF laws we must be able to identify our clients and verify that identity.

How does APIL use this information?

APIL requires personal information necessary to process investor applications and to administer and report on investments as required under the Corporations Act 2001 and Anti-money Laundering and Counter Terrorism Financing Act 2006. APIL is authorised to collect tax file numbers by the Income Tax Assessment Act 1936. It is not compulsory for tax file numbers to be provided for APIL investments, however, if not provided taxation law requires us to deduct tax from distributions at the highest marginal rate.



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APIL may use contact details to let investors know about other products we offer, or about developments within or affecting us. If you do not wish to receive such communications, you can let us know by e-mailing or telephoning us at the contact details below. From time to time, we may provide you with direct marketing material. We will endeavour to meet your request within 2 weeks.

We maintain a Register for those individuals not wanting direct marketing material.

We may also use the information to send you material about other products or services. If you do not want to receive this type of material, tell us and we will stop.

Will APIL disclose your personal information?

APIL may share information with organisations that assist us to verify your identity, administer your investments or provide you with products and services including our internal and external service providers such as administrators and electronic identity verification providers. The organisations receiving this information are not permitted to use your information for any purpose other than the specific purpose it was provided.

There are circumstances under which APIL may disclose your personal information such as:

- When the disclosure is required by law (for example, disclosed to the Australian Taxation Office, AUSTRAC or Centrelink);
- Authorised by law (such as where disclosure is necessary in the public interest or to protect our interests);
- In the event that we propose to sell our business, we may disclose your personal information to potential purchasers for the purpose of them conducting due diligence investigations. Any such disclosures will be made in confidence. In the event that a sale of our business is affected, we may transfer your personal details to the purchaser of the business. As a client you will be advised of any such transfer.

APIL may outsource some of its' administration and marketing activities to service providers in other countries. Where reasonable we request that these providers adhere to our Privacy Policy.

We will also disclose your personal information if you give your consent for us to do so.



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APIL will not disclose your personal information to overseas recipients.

We do not sell mailing lists or provide client information to parties other than those noted above.

How does APIL handle a request for access to personal information?

Under the Australian Privacy Principles you are generally entitled to access the information we hold about you. Where you are entitled to access, the time we require to give you access will depend on the type of information requested. If we can we will answer your question immediately.

We will also try to answer you in the same way that you ask, for example, if you telephone to ask for the information we will if practicable, give you that information over the telephone. We will generally respond to a written request in writing.

Sometimes we will ask that you put your request in writing, for example, where you want copies of material or access to older information or files which are not current or it is necessary for us to retain record of your request.

We may also ask you to identify yourself to our satisfaction.

There are certain conditions under which we may refuse you access to your personal information, such as when your request may unreasonably impact upon another person's right to privacy. If we are entitled under the Australian Privacy Principles to refuse to give you access, we will tell you and provide reasons for our decision.

We will not charge a fee for making a request to access your personal information however we may charge a fee for accessing your personal information. If a fee is applicable, we will disclose this to you prior to providing you with the information.

Storage and Security

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 is treated as confidential and any sensitive information is treated as highly confidential.

Your personal information is generally held in your client file which may be in hardcopy or electronic.



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In the event you cease to be a client of APIL, any personal information which we hold about you will be securely maintained for a period of seven years in order to comply with legislative and professional requirements, following which time the information will be destroyed. APIL will ensure that any documents that are destroyed are done so in a secure manner.

Notifying you of certain data breaches

A data breach occurs when personal information held by us is lost or subjected to unauthorised access or disclosure. If we suspect or know of a data breach, we will take immediate steps to limit any further access or distribution of the affected personal information or the possible compromise of other information.

When we have reasonable grounds to believe that a data breach is likely to result in serious harm – for example identity theft, significant financial loss or your safety compromised we will notify individuals at likely risk as soon as practicable. We will also notify the Office of the Australian Information Commissioner.

Notifications will be made using our usual method of communicating with you such as by a telephone call, email, physical mail, or in-person conversation. If we are unable to contact you, (or your nominated intermediary) by any of the above methods we will publish a statement on the front page of our website and place a public notice on our reception desk.

Email Communication

As electronic communication becomes more and more part of our daily business lives APIL will use your email address that you have provided to contact you when necessary or to provide you with information you have requested.

We will also use your email address to alert you to marketing initiatives, newsletters, or events that may interest you.

If at any time you decide you do not wish to receive such marketing information you have the right to ask us not to send you any further such material. You may do this by advising your adviser or by sending us an email with “Unsubscribe” in the subject line, or clicking an “Unsubscribe” hyperlink if available in the email. Please allow two weeks for this instruction to take effect.



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Website

APIL compliance with the Australian Privacy Principles also applies to your access to our website.

Our privacy policy may be accessed from the website and other information is also posted there for your convenience.

Some areas of our website require you to be a client of APIL and you will be issued with a user name and password which are strictly for your personal use only. APIL will not be liable for any acts that arise from the use of your user name and password whether authorised by you or not or are a result of your failure to maintain strict security protocols over the use of your login details. Please notify APIL immediately if you become aware of a breach of your security.

Our website uses cookies which allows us to identify your browser while you are using our site. Whilst cookies do not identify you, they allow us to track usage patterns. If you do not wish to receive cookies, you can instruct your web browser to refuse them.

Collection of your personal information

There are many aspects of the site which can be viewed without providing personal information, however, for access to future APIL customer support features you are required to submit personally identifiable information. This may include but not limited to a unique username and password, or provide sensitive information in the recovery of your lost password.

If you have objections to the Privacy Policy, you should not access or use the Site.

What if some of the information APIL holds is wrong?

Please tell us. We want our records to be accurate, complete and up to date and we rely on the accuracy of the information to provide you with appropriate recommendations. Unless we disagree with you about the accuracy, currency or completeness of a record, we will generally correct it if requested, (or suggest alternative arrangements for updating our records). If we disagree with you, we will give you our reasons and record your objections on file.

How do I make further enquiries or complain about a breach of privacy?

If you wish to complain about any breach or potential breach of this privacy policy or the Australian Privacy Principles, you should contact us and direct your complaint to the Privacy Officer. We will



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respond to your complaint within 7 days. We will 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.

Contacting us About Privacy and Your Personal Information

Address:

Attention: Company Secretary

PO Box 472, Subiaco WA 6904

Contact number - 08 9380 3222

Email: info@apilgroup.com

Changes to this Privacy Policy

We reserve the right to review and amend this Privacy Policy from time to time but will advise you of any material changes.