

Privacy Policy

1. Privacy Generally

This privacy policy applies to the handling of personal information by ASA Real Estate Partners Pty Ltd (ACN 673 633 755) (**ASA Real Estate Partners**), ASA Funds Management Limited (ACN 079 538 499) (**ASAFM**) and any of their controlled or related entities (together, **ASA Group**, **ASA**, **we**, **us**, **our**) and any managed investment scheme for which a member of the ASA Group is the responsible entity or manage (**ASA Fund**) (each, an **ASA Entity**).

For the purposes of the Privacy Act, personal information is information or an opinion, whether true or not and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.

ASA understands the importance of protecting the privacy of an individual's personal information. This privacy policy sets out how ASA aims to protect the privacy of your personal information, your rights in relation to your personal information managed by ASA and how ASA collects, holds, uses, discloses, and otherwise manages, your personal information.

In collecting, holding, using, disclosing and otherwise managing your personal information, ASA will comply with the *Privacy Act 1988* (Cth) (**Privacy Act**) and the Australian Privacy Principles in the Privacy Act.

2. Kinds of personal information collected

The kinds of personal information that we collect will vary depending on the type of dealings we have with you and how you interact with us.

Where you invest in or inquire about investing in an ASA Fund, the kinds of personal information that we may collect include your:

- identification details such as your name, date of birth, residential and business address and other contact details (such as telephone number and e-mail address);
- drivers licence number, passport number or other similar identification numbers for identity verification and compliance with the *Anti-Money Laundering and Counter Terrorism Financing Act*, the *Corporations Act* or any other relevant laws;
- details regarding your country of residence;
- details regarding any investment you make in the Fund, including your investment balance, credits and redemptions; and
- taxation details, bank account information and other accounting, audit and financial services related information relevant to your Investment in the Fund.

Where you contact us, visit our websites or attend a physical location that we own, occupy or manage, the kinds of personal information that we may collect include:

- your interests, preferences, enquiries and complaint details;
- details regarding your experience at or feedback in respect of a location that we own, occupy or manage;

- CCTV images and video footage from the physical locations that we own, occupy or manage;
- records of the communications we have had with you in person, by telephone, by email or through our websites; and
- where you have enabled cookies, technology information about your use of our websites (such as your internet protocol address, login information, browser type and version).

Where you apply for employment with us or contact us regarding employment opportunities, the kinds of personal information that we may collect include:

- information about your qualifications, skills and experience;
- information about your remuneration and benefits;
- your screening checks (including health, reference, background, directorship, financial probity, identity, visa and eligibility to work, vocational suitability and criminal record checks);
- in relation to your current or former employment, your training, disciplining, resignation, termination terms and conditions, staff benefits, emergency contact details, performance and conduct; and
- taxation details, bank account information, superannuation details and other accounting and financial information relevant to your employment.

We will not generally collect or hold sensitive information about you unless we are required or authorised to do so by law, such as for employment purposes or if we obtain your consent. Sensitive information includes information about your race, political or religious beliefs, sexual preferences, criminal convictions, membership of professional or trade associations or unions or health information.

3. How ASA collects personal information

Generally, we will collect personal information directly from you. For example, ASA may collect personal information:

- where you apply to invest in an ASA Fund or register for an investment in an ASA Fund;
- as part of our administration or management of any investment you make in an ASA Fund;
- where you access any websites, applications or online services of ASA;
- where you request information from ASA regarding an ASA Fund, submit information to us or otherwise interact with us; or
- where we interact with you as a result of our role as responsible entity or manager of the ASA Funds.

There may be other occasions when we collect your personal information from someone other than you, such as

- from other entities that are part of the ASA corporate group;
- where you deal with on behalf of an entity or organisation, from that entity or organisation;
- from a publicly maintained record or database or from third parties such as recruitment agencies, your previous employers, government departments and government databases;
- via CCTV at our offices or properties;
- from persons authorised by you (such as your accountant or financial adviser); or
- from our agents or service providers (such as our identity verification service provider).

4. Purposes for which ASA collects personal information

4.1. General purposes

Generally speaking, ASA collects your personal information for purposes related to our activities as the responsible entity or manager of the ASA Funds. This may include collecting personal information for the purposes of:

- establishing and administering your investments in the ASA Funds;
- communicating with you regarding your investment in the ASA Funds and providing you with access to protected areas of our websites, applications or other online service;
- managing the properties and other assets held or managed by ASA;
- assessing, negotiating and undertaking acquisitions and potential acquisitions for properties and other assets for the ASA Funds;
- evaluating transactions with potential or existing tenants for the properties and other assets held in or managed by ASA, documenting those transactions and performing our obligations under those documents;
- undertaking direct marketing (as detailed in section 4.2 below);
- verifying your identity or the information you supply to us;
- responding to queries you submit to us;
- facilitating our internal business operations;
- accounting, billing and other internal administrative purposes; and
- complying with any legal requirements which we are subject to.

We may also collect, hold, use and disclose personal information to undertake identification and verification processes in accordance with the *Anti-Money Laundering and Counter Terrorism Financing Act*, the *Corporations Act* or any other relevant laws. For certain investors, we may also be required to collect and disclose certain personal information to the Australian Taxation Office in order to comply with the *Foreign Account Tax Compliance Act*.

In addition to the purposes listed above, ASA may collect and use your personal information for other purposes which we notify you of when we collect the information or which is related to the primary purpose we collected it for (where you would reasonably expect us to do so).

You are under no obligation to provide your personal information to us. However, without receiving certain information from you, we may not be able to provide our products or services to you and may not be able to process any application by you for investment in an ASA Fund.

4.2. Direct Marketing

In addition to the purposes set out above, we may collect, use and disclose your personal information to inform you of products, services or offers of ASA entities which may be of interest to you. Where you are an investor in an ASA Fund, this may include providing you with direct marketing information regarding the other funds or products of ASA entities that we think may be of interest to you.

If you do not want to receive this information or do not want us to use or disclose your personal information for direct marketing purposes, you can opt out by letting us know that you wish to opt out of receiving this information and/or ASA using or disclosing your personal information for direct marketing purposes.

5. Disclosing personal information

5.1. General disclosure

Generally we will only disclose your personal information to third parties for a purpose related to the provision of our services as responsible entity or manager of the ASA Funds (or for other purposes outlined in this policy). We may also disclose your personal information to third parties for other purposes with your consent or for any purposes if the disclosure is required or authorised by law.

The types of organisations to which we may disclose your personal information to include:

- other ASA Group members;
- any registry service provider, fund administrator or other similar service provider appointed by us in relation to an ASA Fund;
- your financial advisers or other professional advisers where requested to do so by you;
- third parties who are considering acquiring the assets or business of ASA or making an investment in ASA;
- any other third party service providers who assist us with, among other things, data storage and archiving, audit, accounting, customer contact, legal, business consulting, banking, payment, data processing, data analysis, information broking, research, website and technology services;
- government authorities where required to by law; and
- our professional advisers (including legal and accounting firms, auditors, consultants and other advisers).

Where you apply for employment with us, we may, for the purposes of assessing and processing your application for employment with us, disclose your personal information to our recruitment agencies, background check providers, your nominated referees or previous employers, government agencies and academic or professional bodies.

5.2. Overseas disclosure

Some of the parties that ASA discloses your personal information to may be located outside Australia, including third part service providers that are engaged by ASA.

We take reasonable steps to ensure that any such overseas recipients do not hold, use or disclose your personal information in a way that is inconsistent with the obligations imposed under the Privacy Act and the Australian Privacy Principles in the Privacy Act.

6. Links to other websites

When you access our websites or other online services, we may provide links to other websites, including sites or online services operated by our partners, associates, or independent third parties. Each such website or online service may have its own privacy practices, as described in that site's privacy policy. Those practices may be different than the practices described in this privacy policy, and we encourage you to read each such privacy policy carefully before you use or submit information to that site. Additionally, to the extent that you follow a link to a website operated by an independent third party, please be aware that we exercise no authority or control over that third party and cannot be and are not responsible for any information that you may submit to that site.

7. Security of personal information

We may hold your personal information in both hard copy and electronic forms. We will take reasonable steps to ensure that the personal information we hold is protected against misuse, loss, unauthorised access, modification or disclosure.

Personal information is held on secured servers or in storage located in controlled, access restricted environments. Our employees are required to maintain the confidentiality of any personal information held by us.

We will destroy or de-identify personal information in circumstances where it is no longer required, unless we are otherwise required or authorised by law to retain the information.

Personal information may also, in certain circumstances, be held on behalf of ASA in hard copy or electronic forms by ASA's service providers (such as offsite document storage providers, electronic data storage providers or registry service providers). ASA enters into agreements with such service providers which impose confidentiality and privacy obligations on the service provider.

8. Access to or correction of personal information

ASA takes steps reasonable in the circumstances to ensure that the personal information it collects, holds, uses and discloses about an individual is accurate, complete, up-to-date, relevant and not misleading.

Under the Privacy Act, you have a right to request access to or correction of your personal information that is collected and held by us.

If at any time you would like to request access to or correction of the personal information we hold about you, or you would like more information on our approach to privacy, please contact our Company Secretary, using the contact details set out below.

To obtain access to or correction of your personal information, we may request that you provide us with proof of your identity. This is necessary to ensure that personal information is provided only to the correct individuals and that the privacy of others is protected.

Upon receiving a request for access to or correction of personal information we will review the request, make a decision regarding the request and notify you of that decision. We will seek to respond to requests for access to or correction of personal information within 30 days of the date of the request.

In some circumstances, a fee may be charged for the cost of providing you with access to your personal information (for example where providing access requires a detailed retrieval of your personal information). Such a fee will not exceed the cost to ASA of providing access.

9. How to contact us

For further information or enquiries regarding your personal information or to request access to or correction of personal information or to make a privacy complaint, please contact ASA's Company Secretary using any of the following contact details:

Company Secretary

Email: cosec@asarep.com

Telephone: +613 9221 6215

Post: Level 27, 101 Collins Street Melbourne VIC 3000

10. Privacy complaints

If you believe that we have not dealt with your personal information in a manner that complies with the Privacy Act or the APPs, you can make a privacy complaint to us using the details above. Please submit this to us in writing.

At all times, privacy complaints:

- will be treated seriously;
- will be dealt with promptly;
- will be dealt with in a confidential manner; and
- will not affect your existing obligations or affect the commercial arrangements between you and us.

Upon receipt of your complaint, we will commence an investigation into your complaint. You will be informed of our response to your complaint following the completion of the investigation. We will seek to respond to privacy complaints within 30 days of the date of the complaint.

In the event you are dissatisfied with the outcome of your complaint, you may refer the complaint to the Office of the Australian Information Commissioner.

Office of the Australian Information Commissioner

Visit: www.oaic.gov.au

Email: enquiries@oaic.gov.au

Call: 1300 363 992

Mail: GPO Box 5218, Sydney NSW 2001

11. Policy Review

This policy will be reviewed at least every two years or more regularly if there are changes to the legal or regulatory framework which applies to this policy to ensure it is working effectively and updated appropriately. Any updated privacy policy will be made available on the website at www.asarep.com/policy/privacy-policy or can otherwise be obtained by contacting us and requesting a copy.

12. Policy Approval

This Policy was approved by the Board of each of:

- ASA Real Estate Partners on 27 June 2024; and
- ASAFM on 28 June 2024.