



# Australian Privacy Policy

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## CROMWELL PROPERTY GROUP

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Cromwell Corporation Limited ABN 44 001 056 980

Cromwell Property Securities Limited ABN 11 079 147 809

Cromwell Funds Management Limited ABN 63 114 782 777

Cromwell Property Group comprises:

Cromwell Corporation Limited (ABN 44 001 056 980) and Cromwell Diversified Property Trust (ARSN 102 982 598) the responsible entity of which is Cromwell Property Securities Limited (ABN 11 079 147 809, AFSL 238052).

# Australian Privacy Policy

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## 1. Introduction and Purpose of Policy

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Cromwell is committed to its clients and both respects and takes steps to protect the privacy of the personal information of individuals with whom it deals. The way we manage your personal information is governed by the *Privacy Act 1988* (Cth) (Act) and the Australian Privacy Principles (APPs) established under the Act (as amended from time to time).

Our Australian Privacy Policy tells you how we manage personal information we may collect about you if you are in Australia, how we may use and disclose it (including overseas), steps we take to keep it secure, how we store it, how to access and correct your personal information and how you can complain and how we will deal with your complaint. Note that Cromwell's European Privacy Policy is available on our website at:

[www.cromwellpropertygroup.com/policies/privacy-policy-eu](http://www.cromwellpropertygroup.com/policies/privacy-policy-eu).

In this Privacy Policy:

- **Cromwell, we, us** and our refers to Cromwell Corporation Limited, Cromwell Property Securities Limited and Cromwell Funds Management Limited and our related entities;
- **You or your** refers to you as a current or prospective Cromwell client, individual user of Cromwell's websites or any of our services and any other individual who we deal with and about whom we may collect personal information; and
- the singular includes the plural and vice versa.

## 2. What is personal information?

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For the purposes of this Privacy Policy, "personal information" is any information or opinion, in any form and whether true or not, which identifies an individual or from which an individual's identity is apparent or can be reasonably ascertained. It includes sensitive information such as health information.

## 3. Collecting personal information

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### 3.1 What kind of personal information do we collect?

The information we collect will depend on who you are and the nature of your dealings with us. The types of personal information we may collect include:

- your contact and identification details such as your name, address, date of birth, telephone number, email address, and other identity information from any documents you offer as proof of your identity (for example, driver's licence details or passport);
- transactional information you provide when dealing with us (for example, bank account details and Tax File Number);
- personal information you provide when you commence a client relationship with us, including in application forms for our products (the types of information that may be collected are set out in the first point above);

- personal information you provide when you apply for employment at Cromwell including when providing a resume or completing new employee forms (the types of information that may be collected are set out in the first point above);
- any correspondence between you and us; and
- any other personal information you provide when you make an inquiry, request information or otherwise correspond with us.

### 3.2 Reasons for collecting your personal information

Cromwell collects your personal information to enable us to provide our products and services, process job applications, administer our business and comply with our legal obligations.

In particular, Cromwell may collect personal information in order to:

- determine your requirements and so provide you with appropriate information about our products and services;
- process any communication you send us (which includes answering any queries and dealing with any complaints or feedback you have);
- conduct internal research to improve the way we interact and communicate with you;
- comply with our legal obligations including the obligation we have to identify our customers before dealing with them (for example, under the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth));
- get in contact with you should we need to;
- do anything which you authorise or consent to us doing; or
- take any action we are required or authorised by law to take.

If you do not provide us with your personal information, it may not be possible for us to provide you with the products or services you have requested or to take any of the above steps.

Where it is lawful and practical to do so, we may allow you to deal with us anonymously.

### 3.3 How do we collect personal information?

If possible, we always try to collect personal information directly from you when you deal with us (for example, when you make an enquiry, correspond with us, or apply for, use or access any of our products or services).

We may also obtain your personal information from third parties we deal with (for example, your financial advisers, our contracted service providers or any other organisation acting on behalf of Cromwell).

We may also collect personal information from third parties you refer to us. If we do so, we will assume that you have made that third party aware of the referral and the purpose(s) of the collection, use and disclosure of the relevant personal information.

## 4. How we use and disclose that information

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### 4.1 Use and disclosure

We use your personal information to assist us in conducting our business and providing you with investment products and services. This includes to:

- keep in contact with you (where you have requested us to do so) and provide you with any information you have requested;
- process any communications you send us (including answering any queries and dealing with any complaints or feedback you have);
- inform you of investment opportunities or to provide information about investment products and services which we think might be of interest to you;
- properly identify you;
- maintain any business relationship we have with you including as an investor;
- help us develop, manage and improve services to our customers;
- do anything you authorise or consent us to do; and
- take any action or communicate with you where we are required or authorised by law to do so.

We may disclose your personal information to:

- our business associates, referral partners, agents and other entities for purposes which are related to our purposes for collecting your personal information;
- other organisations with whom we have alliances or arrangements for the purposes of promoting our respective products or services;
- our professional advisers, contractors, or other service providers we engage to carry out, or advise on, our functions and activities (for example, the Cromwell Property Group registry and organisations who conduct investor surveys on our behalf);
- your nominated financial adviser;
- any other entity to which we are required or authorised by law to disclose such information (for example, law enforcement agencies and government agencies); and
- with your consent, express or implied, to others.

### **Overseas disclosures and transfers**

We may send your personal information to our related bodies corporate and third-party service providers to whom we outsource certain functions, such as email functions, who may be located overseas, including in New Zealand, India, the United States of America, Ireland and the United Kingdom. Our technology service providers may also store your personal information overseas, but only to the extent required to securely back-up data.

When we disclose your information overseas, we are required to take measures to ensure your information is treated in accordance with the standards that apply in Australia except in rare cases (for example, where we are required by law to disclose your information overseas) or unless where we obtain your consent not to take these measures.

## **4.2 Direct marketing and disclosure to third parties**

We or the above third parties may also use your personal information to provide you with information about our products and services.

You may request not to receive marketing material from us at any time by contacting us (details below). If you tell us you no longer wish to receive marketing or promotional material from us, we will not send you any such material. If you change your mind in the future and wish to receive marketing or promotional material from us, please contact us.

### **Stopping marketing and promotional material from third parties**

As a general rule, if third parties have received your personal information, their handling of your personal information will be governed by their privacy notices and policies. In some cases, it may also be necessary for you to contact the relevant organisations to whom we have provided your personal information to notify them of your decision.

## **5. Keeping information secure**

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We will take reasonable steps to protect your personal information from misuse, interference and loss, and unauthorised access, modification or disclosure. Cromwell maintains a robust security posture that includes: perimeter protection, identity protection, data protection, social engineering and awareness initiatives, and intrusion detection and alerting. In addition, Cromwell conducts security evaluations and penetration testing on an annual basis to ensure the efficacy of implemented measures.

If you are concerned that the security of any personal information we hold about you may be compromised, please let us know as soon as possible using the contact details below.

We will also take reasonable steps to securely destroy or de-identify personal information when it is no longer required (including where we receive unsolicited personal information). However, we may be required by law to retain certain information for a set period of time. After that time, we will destroy or delete this information in a secure manner.

## **6. How you can access, correct and update your information**

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To effectively provide you with products and services, it is important that the personal information we hold about you is complete, accurate, current, relevant and not misleading.

At any time we hold personal information, we may ask you to tell us of any changes to your personal information. Alternatively, if you are aware that the personal information we hold needs to be corrected or updated, please contact us at the contact details below (section 9). Alternatively, if you are an investor or securityholder and have online access with our registry providers (Boardroom Pty Limited and Link Market Services Limited) you can update these details through the secure portal.

You can also ask for access to the personal information we hold about you by contacting us using the contact details. We will provide you with access unless an exception applies. If we decide not to provide you with access to or correct your personal information, we will give you written reasons for our decision and explain how you can complain if you are not satisfied.

Cromwell will respond to all requests made within a reasonable period after the request is made. We may need to verify your identity or seek further information in order to respond to your request.

## **7. Our Website**

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### **7.1 Online systems**

We take reasonable steps to maintain the security of personal information you provide to us online.

We seek to keep current with available security and encryption technology so as to maintain the effectiveness of our security systems. However, no transmission over the Internet can be guaranteed as being totally secure. Accordingly, we cannot warrant or ensure the security of any information you provide to us over the Internet. Please note that you transmit information at your own risk.

If you visit the Cromwell website to browse, read or download information, our system will log these movements. These website logs are not personally identifiable and we do not link them with the individuals who browse the site, except where a website user has previously registered with the site and has logged in with their account details. Registered users (when logged in to the site) will additionally have usage information collected such as time and date of site access, documents downloaded and requests for password resetting that is matched to the account registration details provided by the user.

### **7.2 Cookies**

Our website uses cookies to assist in your website navigation by customising site information tailored to your needs. Cookies are packets of information stored on your computer for this sole purpose. If you are concerned about cookies, you can set your browser to reject cookies or to alert you when cookies are being used (although rejection of cookies may affect your use of the website).

### **7.3 Links to other websites**

Our website includes hyperlinks which enable access to a number of third party websites. These third-party websites are not subject to this Privacy Policy. To determine how they deal with personal information, you should ensure you read their respective privacy policies.

## **8. Changes and updates to this Policy**

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This Privacy Policy is reviewed and updated at least annually. Cromwell may amend this Privacy Policy from time to time including to reflect changes to its legal obligations, practices or technology. If we amend this Privacy Policy, we will make the updated Privacy Policy available on our website and this version will apply from the time of posting. Cromwell encourages you to periodically review this Privacy Policy to be informed of how Cromwell is handling your personal information.

## 9. Contact Details

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If you have any questions or concerns regarding our Privacy Policy or handling of your personal information, please contact us.

### The Privacy Officer

Cromwell Property Group  
GPO Box 1093  
Brisbane QLD 4001  
Freecall: 1300 276 693  
Telephone: (07) 3225 7777  
Fax: (07) 3225 7788  
email: [privacy@cromwell.com.au](mailto:privacy@cromwell.com.au)

## 10. Complaints

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If you wish to make a complaint about how we have managed your personal information, please contact our Privacy Officer at the contact details above or on our website. We will acknowledge receipt of your complaint and try to resolve it as quickly as possible. In some cases, where there are complicated facts or circumstances, or where we need to deal with third parties, it may take a few weeks to investigate your complaint and address your concerns.

If you are not satisfied with how we handled your complaint, you can lodge a complaint with the Office of the Australian Information Commissioner at:

- **Telephone:** 1300 363 992 (if calling from outside Australia, including Norfolk Island, please call +61 2 9284 9749)
- **TTY:** 133 677 then ask for 1300 363 992 (this number for the hearing impaired only, no voice calls)
- **Post:** Director of Complaints, Office of the Australian Information Commissioner, GPO Box 5218, Sydney NSW 2001
- **Fax:** +61 2 9284 9666
- **Email:** [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)
- **Website:** <https://www.oaic.gov.au/individuals/what-can-i-complain-about>