Privacy Policy

1. Purpose

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 Privacy Policy tells you how we manage personal information we may collect about you if you are in Australia, including what personal information we collect, 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.

2. Collecting personal information

2.1 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 or supplier/vendor 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 and sensitive information that is reasonably necessary to enable us to comply with anti-money laundering and counter-terrorism financing obligations, including personal information and identity documents required to conduct customer due diligence;
- personal information you provide when you apply for employment at Cromwell or when you are employed by us, including information collected through the onboarding process and employee surveys. Sensitive information collected may include gender, nationality, ethnic origin, languages spoken, dietary needs and health information, where reasonably necessary for our functions or activities and where permitted by law;
- your image may be collected by CCTV or photography footage if you visit our properties;
- 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.

2.2 Reasons for collecting your personal information

Cromwell collects your personal information to enable us to provide our products and services, process job applications, support employment, 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 our obligations as a reporting entity under the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth) (**AML/CTF Act**) and *Anti-Money Laundering and Counter-Terrorism Financing Rules 2025* (Cth) (**AML/CTF Rules**) (together, **AML/CTF Legislation**);
- 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. However, this may not be available where we are required to verify your identity, including to comply with anti-money laundering and counter-terrorism financing, tax, financial services or other legal obligations.

2.3 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 or provide products or services to us).

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 us to. 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.

We may obtain personal information from registry providers, custodians, administrators, identity verification service providers, screening providers, financial advisers and other service providers who assist us to comply with our legal, regulatory and risk management obligations.

We may also collect your personal information from a third party where authorised by law.

3. How we use and disclose that information

3.1 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;
- carry out our obligations as a reporting entity under the AML/CTF Legislation including to verify your identity, identify beneficial owners or controlling persons, understand the nature and purpose

of your relationship with us and assess or review your customer risk rating, and, where applicable, assess, monitor and manage risks in respect of money laundering, terrorism financing and other financial crime before and during our dealings with our customers;

- 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.
- If you apply for a role with us or are employed by us, your personal information will be confidentially stored and we may use your information to report various employment demographics to regulators, industry bodies and to shareholders.

Cromwell currently does not use automated decision making or artificial intelligence (AI) tools to process personal information. We will update this Privacy Policy if we introduce these kinds of tools in future, which results in a change to the way your personal information is handled.

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;
- service providers who assist us with customer identification, verification, screening, customer risk assessment, transaction monitoring, ongoing due diligence, reporting, record keeping and other compliance activities required under AML/CTF Legislation;
- AUSTRAC, law enforcement agencies, regulators and other government agencies or entities where we are required or authorised by law to disclose the information; 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, Malaysia and the United States of America. 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 where we obtain your consent not to take these measures.

3.2 Direct marketing and disclosure to third parties

We or the above third parties may also use your personal information (or your sensitive information, where you have provided consent) 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.

4. Keeping information secure

We will take reasonable steps to protect your personal information as we maintain a robust security posture. In addition, Cromwell conducts security evaluations and testing on an annual basis to ensure the efficacy of implemented measures.

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 or authorised by law to retain certain information for a set period of time, including records for anti-money laundering and counter-terrorism financing, tax, financial services, employment, corporate and regulatory purposes. After the relevant retention period has ended, we will destroy, delete or de-identify this information in a secure manner.

5. How you can access, correct and update your information

You are entitled to make a request to access personal information that Cromwell holds about you under Australian Privacy Principle 12. To make a request for access to your personal information, you can contact us using the details below (section 9). Please note that we may decline a request for access to personal information where authorised under the Act.

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

If you become 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, you can update these details through the relevant secure portal.

6. Our website

6.1 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.

When you visit the Cromwell website, we may collect technical and usage information, including your IP address, browser type, operating system, referring website, pages viewed, files downloaded, dates and times of access, and information collected through cookies and analytics technologies.

While this information alone will not generally identify you, some information may constitute personal information, or become personal information when combined with other information held by Cromwell or our service providers. We use this information to operate, maintain, secure and improve our website and

digital services, understand how visitors use our website, measure the effectiveness of our communications and marketing activities, and protect against unauthorised access, fraud or misuse.

Cromwell may introduce new website functionality, analytics tools or digital services from time to time. Any personal information collected through those services will be handled in accordance with this Privacy Policy and applicable privacy laws.

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.

6.2 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).

6.3 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.

7. Changes and updates to this policy

This Privacy Policy is reviewed at least annually, and any substantive change to this policy will require Board approval. 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.

8. Glossary

Term	Meaning
Cromwell or Group	Cromwell Property Group comprises Cromwell Corporation Limited ACN 001 056 980 (CCL) and the Cromwell Diversified Property Trust (Trust) (the responsible entity of which is Cromwell Property Securities Limited ACN 079 147 809 (CPS), and subsidiaries of those entities. The units in the Trust are stapled to ordinary shares in CCL and trade jointly on the Australian Securities Exchange (ASX) as Cromwell Property Group stapled securities (ASX:CMW). Subsidiaries include Cromwell Funds Management Limited ACN 114 782 777.
Personal Information	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.
Privacy Officer	the person performing the role of Privacy Officer as referred to in section 9.

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

In this Privacy Policy the singular includes the plural and vice versa.

9. Contact details

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 268 078
Telephone: +61 7 3225 7777
Email: privacy@cromwell.com.au

10. Complaints

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 via:

- **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
- **Website:** What you can complain about - Home (oaic.gov.au)