



A U S T R A L I A N D E V E L O P M E N T C A P I T A L

Australian Development Capital Pty Ltd (ADC) and its 'related bodies corporate' (as the term is defined in the Corporations Act 2001 (Cth)) comply with the Australian Privacy Principles contained in the Privacy Act 1988 (Cth) and the Privacy Amendment (Enhancing Privacy Protection) Act 2012 to protect the personal information ADC holds about individuals.

ADC's policy is to only collect personal information which is reasonably necessary for its dealings with the relevant individual. ADC only uses personal information for the purpose specified or which is reasonably apparent at the time the information was collected, or for a related purpose for which the individual would reasonably expect it to

be used. ADC takes reasonable steps to protect personal information that it holds from unauthorised access, modification, misuse, interference, and loss. ADC may sometimes disclose personal information overseas to allow external parties to perform their services for ADC, but ADC will only do so in accordance with the Australian Privacy Principles.

The ADC Privacy Policy contains information about how you may request access to, and correction of personal information ADC holds about you, or to make a complaint about an alleged breach of the Australian Privacy Principles. ADC, recognises the importance of privacy and is committed to protecting individuals' personal information.

This Policy describes how ADC complies with its privacy obligations in protecting the personal information ADC holds about individuals.

ADC is an Australian real estate business. Its operations are principally located in Perth, Western Australia and its key activities include:

- development of commercial and residential assets; and
- asset management

Personal information collected by ADC

The type of personal information that ADC collects will depend upon what dealings the relevant individual may have with ADC. For example, ADC may collect and hold personal information about individuals who purchase, or express an interest to purchase, a ADC property (for example, when entering into a sale and purchase agreement, or when responding to requests for information about a ADC property).

The types of personal information that ADC collects may include:

- information that identifies the individual (for example, name, gender, address, contact details, date of birth, photographic or video images);
- information needed to verify an individual's identity such as a driver licence number;
- information about the individual's financial position and credit-worthiness;
- an individual's employment history, and other information an individual provides as part of the recruitment process;
- information about the individual that is required or authorised by law;
- the individual's tax file number;
- the individual's opinion/preferences about ADC's products, services or staff.



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ADC generally does not collect sensitive information about an individual. However, in certain circumstances, ADC may collect some sensitive information if it is reasonably necessary to allow ADC to deal with the individual and provided that the individual has given consent for ADC to do so.

How ADC collects and holds personal information

Whenever it is reasonable and practical to do so, ADC collects personal information directly from the individual. However, in some circumstances, personal information may be provided to ADC by other parties such as the individual's agent, employees or ADC's authorised agents, service providers and subcontractors. ADC will take reasonable steps to inform the individual that it has the individual's personal information, unless it is obvious from the circumstances.

When ADC collects personal information, ADC will generally provide notification of the collection to the individual to inform the individual about the purpose for the collection, the main consequences for the individual if all or some of the personal information is not collected, the types of entities that the information is disclosed to, the overseas recipients the information is disclosed to (where applicable) and the countries in which such recipients are likely to be located if it is practicable to specify those countries, and that the ADC Privacy Policy contains information about how the individual may access the personal information held by ADC and how the individual may make a complaint.

The purposes for which ADC collects, holds, uses and discloses personal information

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

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

- providing products or services that have been requested;
- communicating with the individual;
- helping ADC manage and enhance its products and services, including analysing customer feedback and future customer needs;
- complying with regulatory and legal obligations;
- recruiting employees and contractors; or
- fulfilling its obligations to employees.

ADC may send marketing materials to its customers or potential customers where ADC has collected the personal information from the individual and the individual would reasonably expect ADC to use the information for that purpose. In these instances, ADC provides a simple means by which the individual may easily request not to receive direct marketing communications from ADC.

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



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ADC may disclose personal information to its related bodies corporate.

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

- ADC's contractors, consultants, advisers and service providers who assist ADC in the operation of its business;
- joint venture partners for the purposes of seeking relevant regulatory approvals;
- third party lenders and insurers;
- the Australian Securities Exchange, the Australian Securities and Investments Commission and to other regulatory authorities or government agencies as agreed to or required by law;
- anyone authorised by a provider of personal information;
- relevant parties in situations when ADC is required by law to provide the information.

ADC limits the information disclosed to external parties to what is required for them to perform their services for ADC or the relevant individual, or what is required by law.

Disclosure of personal information to overseas recipients

From time to time, ADC may disclose personal information to external parties located outside Australia to allow the external parties to perform their services for ADC.

ADC 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 and does not breach the Australian Privacy Principles.

ADC does not sell personal information.

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

ADC will take reasonable steps to protect personal information that it holds from unauthorised access, modification, disclosure, misuse, interference and loss. ADC 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. ADC employees are required to maintain the confidentiality of any personal information held.

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

How an individual may access personal information about the individual that is held by the entity and seek the correction of such information

Any individual can request access to the personal information ADC may hold about them. To obtain access to the information, the individual needs to write to ADC (refer to contact details below). ADC 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, ADC will provide an estimate of how much this service will cost and request agreement before proceeding.



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In normal circumstances, ADC 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, ADC will provide the individual with written notice setting out the reasons for doing so.

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 ADC requesting the information to be changed. If ADC disagrees with the individual that the personal information should be changed, ADC will provide the individual with written notice setting out 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 ADC.

ADC reserves the right to change this Policy at any time. ADC will notify any changes to this Policy by posting an updated version of the Policy on the project website.

How an individual may complain about the way in which ADC handles personal information

An individual can make a complaint about the way in which ADC has handled an individual's personal information by writing to ADC. ADC will endeavour to act promptly in response to a complaint. You may also contact the Office of the Australian Information Commissioner.

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>.

This policy was approved and adopted by ADC on 21 September 2023.

ADC contact:

Address: Level 1, 29 Napoleon St, Cottesloe WA 6011 WA email: info@auscapital.com.au