



PRIVACY POLICY

Policy Snapshot

We are committed to protecting your¹ privacy in compliance with our legislative obligations.

We will only collect, use, handle and disclose personal information as allowed by, and in compliance with, the privacy legislation applicable to us.

Your privacy is important to us

QIC Limited and its subsidiaries (together 'QIC', 'we' or 'our') are committed to protecting your privacy, in compliance with the Australian Privacy Principles (APPs) and the Privacy Act 1988 (Cth). Our subsidiaries in the U.K. and the U.S. also protect your privacy in compliance with local privacy laws.

We are committed to being open about how we use personal information and this Policy sets out how we handle your information.

Collection of information

We limit our collection of personal information² to those details we identify as reasonably necessary for the lawful purposes of our business.

Being a wholesale funds manager, we do not collect or hold personal information in relation to individual members of funds who invest with us. Personal information will only be collected by lawful and fair means from the individual concerned (where practicable) or their representative. The collection of 'sensitive information'³ will only be in accordance with the law.

We will inform you at or before the time of collection (or as soon as possible afterwards) of the purposes for collection, to whom your information might be disclosed and any other relevant details that will help you to ensure we are protecting your privacy. In some instances, we may direct you to this Policy for this information.

We take reasonable steps to keep personal information as accurate, complete, and up-to-date as is necessary for the purposes we have identified.

¹ The Privacy Act 1988 (Cth) and this Policy do not apply to the handling of personal information directly related to a current or former employment relationship with QIC or to employee records held by QIC.

² **'Personal information'** is information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- (a) whether the information or opinion is true or not; and
- (b) whether the information or opinion is recorded in a material form or not.

³ **'Sensitive information'** is a subset of personal information. It means information or an opinion about an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, criminal record, health, genetics or biometrics. As a general rule, the only type of sensitive information we hold is in relation to an individual's professional or trade association membership.



Handling of information

We only collect and use information for the purpose of providing our products or services, including sending you information, or undertaking our business. In relation to our Global Real Estate business, we collect and use personal information for purposes in connection with the management, administration, operation and promotion of our retail and commercial properties. Examples of who we usually collect information from, types of information, purposes for collection and method of collection are contained in a Table in Appendix 1.

Disclosure of information

At QIC, personal information is strictly confidential. We will only disclose personal information in accordance with the law. We may disclose your personal information:

- to other companies within the QIC group;
- to our insurers and insurance brokers;
- to our commercial and joint-venture partners;
- to third parties who perform services for us;
- to law enforcement or government agencies, including where necessary to meet our statutory obligations;
- where it is required or authorised by law;
- where we use it for the purposes for which it was collected; or
- where you have consented to the disclosure of your personal information.

We may use and disclose your personal information overseas, including to recipients located in countries where we have an overseas office as listed [here](#). Any information sharing will be in compliance with the APPs (or U.K. or U.S. privacy laws as applicable) and governed by our strict standards and policies, and where appropriate, confidentiality and other agreements to ensure your information is secure and treated with the utmost care and respect.

However you should be aware that if:

- you are located in Australia;
- we disclose your personal information to recipients outside Australia; and
- they handle that information in a way that breaches the APPs,

the overseas recipient may not be accountable under the Privacy Act 1988 (*Cth*), and you may not be able to seek redress under the Privacy Act 1988 (*Cth*).

Depending on their location, a recipient outside Australia may not be subject to any privacy obligations or to any principles similar to the APPs, and you may not be able to seek redress in that jurisdiction. Recipients outside Australia may also be subject to a foreign law that could compel the disclosure of personal information to a third party, such as an overseas authority.

Storage of information

We protect personal information with appropriate safeguards and security measures and restrict access to those who have a legitimate business purpose and reason for accessing it. Personal information is only retained for as long as it is necessary for the identified purposes or as required by law.



Information access and correction

At QIC, decisions and actions may be taken or made on the basis of personal information in our possession and we take reasonable steps to keep personal information as accurate, complete, and up-to-date as is necessary.

We will give you, or your authorised representative, access to your information unless the request is frivolous, vexatious or there are other lawful reasons to restrict access. We may require identification to ensure the person requesting access is entitled to such access. If you, or your representative, is denied access to your information, we shall provide reasons for the denial. You may also make an application to access or amend your personal information under the Information Privacy Act 2009 (Qld). See the Office of the Information Commissioner website for further information.

If you believe any part of the information is inaccurate, incomplete or not up-to-date, you should contact your usual QIC contact and request we amend it accordingly. We may ask you to put your request in writing. If we are reasonably satisfied our records need correcting, we will make the correction as soon as possible. If we do not agree our records need correcting, we will inform you of the reason(s) and you may require us to keep a statement on our records that you believe the information is inaccurate, incomplete, misleading, irrelevant or not up-to-date.

If you are a registered member of one of our Shopping Centre membership programs, you may be able to access and update the information on your member profile in the applicable section of the Shopping Centre website.

Opting out of communications

If you receive direct marketing communications from us, you may easily request not to receive such communications from us by:

- (a) following the instructions on the communication to opt-out or unsubscribe from further communications;
- (b) if you are a member of one of our Shopping Centre membership programs, by logging into the member area on the Shopping Centre website and ticking the opt-out option;
- (c) contacting your usual QIC contact; and
- (d) contacting our Privacy Compliance Officer.

Resolving enquiries or complaints

If you have any questions, concerns or complaints about the treatment of your personal information, the first step is to discuss the issue with your usual QIC contact. Any privacy related breaches will be managed in accordance with our Breaches and Incidents Policy.

If your concerns have not been resolved to your satisfaction, please contact our Privacy Compliance Officer on +61 7 3360 3922 or by email at privacy@qic.com. In the U.K., please contact our UK Data Protection Officer on +44 20 7092 8220 or by email at privacy@qic.com. We may ask you to put your query in writing.

If after contacting our Privacy Compliance Officer your concerns remain unresolved, you may contact the Office of the Australian Information Commissioner on 1300 363 992, or by email on enquiries@oaic.gov.au. You can also visit their website at www.oaic.gov.au. In the U.K., you may contact the Information Commissioner's Office on 0303 123 1113. You can also visit their website at www.ico.gov.uk.

Person	Types of information	Identified purposes	Method of collection
Key individuals employed by our investment clients or their representatives	Business and personal contact details, family information (such as name of spouse/partner, and details of children), social preferences (information which enables us to tailor events and entertainment), special dietary information	Client relationship management, business development, seminars and other client events, and for the conduct of daily business operations including the identification of clients as required by law or regulation	Verbally or by email, directly from the individual or personal assistant / secretary
Potential employee candidates	Employment history, experience, qualifications, contact details, and checks as to criminal history, personal insolvency and regulatory sanction	Assessment for suitability for a current or future position	Resumes received from applicants in response to positions advertised, or unsolicited resumes, or completion of a criminal history / insolvency check form (or by way of a response received from an external agency verifying the details provided on the form)
Industry-related contacts and other individuals interested in QIC or the funds management industry	Contact details (including job title and name of their organisation)	Distribution of newsletters and other publications to provide regular information about the views and operations of QIC	Directly from the individual, either verbally or via a form for updating details
Individuals who supply (or are employed by organisations that supply) goods or services to QIC – this includes those who facilitate our investment transactions	Contact details and bank account details (where financial transactions are undertaken)	In relation to the supply of the goods and services and to facilitate the credit and payment arrangements	From the individual directly, usually verbally or from transaction documentation
Individuals in respect of who we are obliged by law to conduct AML/CTF checks	Copies of identification documents	To enable QIC to comply with our AML/CTF obligations	Directly from the individual, either verbally or via a form for collecting details

Person	Types of information	Identified purposes	Method of collection
In relation to retail and commercial properties held as assets of QIC investment funds associated with our Global Real Estate business (GRE Properties):			
Individual tenants, licensees and guarantors (and key individuals associated with corporate tenants, licensees and guarantors) of leases and licences of GRE Properties (including potential tenants, licensees and guarantors and associated key individuals)	Information collected may include: Contact details, date of birth, ABN, financial and trading information, business experience, insurance details, and copies of identification documents	Leasing and licensing negotiations, decisions (including assessing applications) and documentation, managing tenancy design and delivery process, operational tenancy and Shopping Centre communications, relationship management, issuing invoices and notices, sale of premises, providing access to marketing retailer portal and monitoring performance and value of GRE Properties	Leasing and licensing applications and documentation; communications with tenants, licensees, guarantors and solicitors
Customers (or other individual visitors) of retail GRE Properties (Shopping Centre)	Information collected may include: Contact details (including name, address, phone number, gender, email address, interest, date of birth), shopping preferences, interests, photographic and video images	<p>Direct marketing (e.g., promotional activities, distribution of e-newsletters, advertising (including third party advertising), and other publications and communications and mobile push notifications).</p> <p>Administration of events and promotional activities at the Shopping Centres (including competitions and promotions)</p> <p>Administration of our Shopping Centre gift card program.</p> <p>Providing services to customers at Shopping Centres (for example, mobility aid hire services, lost and found services and other services to benefit customers)</p> <p>Photographic and video images are used for security purposes or for promotional activities</p>	<p>Directly from the individual, either verbally or via a form for collecting details.</p> <p>For images, from video surveillance cameras when customers visit our Shopping Centre or when using cameras for promotional activities</p>

Person	Types of information	Identified purposes	Method of collection
<p>Individuals who use websites associated with our Shopping Centres or our Global Real Estate business, who use free Wi-Fi services provided at our Shopping Centres, who interact with us through social media pages associated with our Shopping Centres or who download and use our Shopping Centre smartphone applications</p>	<p>Information collected may include: Contact details (including name, address, phone number, gender, email address, date of birth), shopping preferences, interests, social media IDs, likes and areas of interest, IP address or the fully qualified domain name from which the individual accessed our website, the date and time an individual accesses our website, the web browser that is being used by the individual to access our website and the pages accessed and the URL of any webpage from which the individual accessed our website</p>	<p>Direct marketing (e.g., promotional activities, distribution of e-newsletters, advertising (including third party advertising) and other publications and communications and mobile push notifications).</p> <p>Administration of events and promotional activities at the Shopping Centres (including competitions and promotions)</p> <p>Administration of our Shopping Centre gift card program</p> <p>Customising and improving our website and e-newsletter content</p>	<p>Directly from the individual when they sign up for membership of a Shopping Centre membership program, register for an event, sign-up to receive communications regarding opportunities or offers associated with one or more Shopping Centres or participate in a competition or promotion or access a free Wi-Fi service at a Shopping Centre.</p> <p>We use cookies to track usage of our website.</p>
<p>Individuals who supply goods or services or carry out works in respect of GRE Properties (or are employed or engaged by organisations that do so)</p>	<p>Information collected may include: Contact details, ABN, financial information, insurance details, business experience</p>	<p>Tendering, contract negotiations, decisions and documentation in relation to the supply of the goods and services or the works, operational communications, and to issue and process invoices</p>	<p>From the organisation or from the individual directly (either verbally or through quotes, correspondence, tender forms or contract documentation), through contractor induction and compliance processes</p>