

1 About this Privacy Policy

This document sets out the policy of Kador Group Holdings Pty Ltd (ACN 006 443 643) and our related entities (**We, Our, Us**) relating to the privacy of your personal information (**Privacy Policy**).

We are committed to protecting the privacy of the personal information we collect and receive. We are bound by the Australian Privacy Principles (**APP**) contained in the Privacy Act 1988 (Cth).

This Privacy Policy applies to all your dealings with us where we obtain your personal information whether at our office, via our website (www.kadorgroup.com.au) or via real estate agents, finance providers, credit reporting agencies or other third parties acting on your or our behalf.

You accept this Privacy Policy and expressly consent to our collection, use and disclosure of your personal information as described in this Privacy Policy by using our website, completing any application forms, seeking to lease premises from us or conducting any other business with us.

A copy of this Privacy Policy is available on our website (and we may amend it from time to time by updating that copy). A printed copy can be obtained free of charge by contacting our Privacy Officer.

2 What Personal Information we collect

We only collect personal information (being information that identifies or could reasonably identify an individual) where we consider it to be reasonably necessary for our functions and activities.

We collect personal information to provide services and information in connection with our business operations including when:

- evaluating potential lease transactions;
- evaluating property acquisitions and disposals;
- preparing and managing the terms and arrangements that cover our transactions;
- managing, reviewing and improving our business and provision of services;
- evaluating contractors and potential staff;
- communicating to our business contacts and conducting surveys;
- you subscribe to a mailing list;
- you use our website; and
- dealing with requests for information about us or our investment portfolio.

The types of information we collect include:

- name, and contact details (including phone number, postal address, facsimile and e-mail);
- financial information (including financial standing, assets and liabilities, profitability, transaction and credit or debit card details or in relation to provision of credit);
- billing or payment information.

3 How we collect your personal information

We will collect your personal information by lawful and fair means directly from you unless it is unreasonable or impracticable to do so.

We may collect personal information directly:

- over the telephone;
- by written correspondence (such as email, mail, fax);
- on hard copy forms;
- in person;
- through our website;
- through our security surveillance cameras; and/or
- electronic systems such as applications.

We may collect your information from third parties including:

- your legal representatives;
- real estate agents;
- direct marketing database providers;
- credit reporting agencies and finance providers;
- Australian Securities and Investment Commission (**ASIC**); and
- public sources (phone directories, membership lists, professional and trade associations, bankruptcy or court registry searches).

4 Unsolicited personal information

Unsolicited personal information is personal information we receive that we have taken no active steps to collect.

We may keep records of unsolicited personal information if the information is reasonably necessary for one or more of our functions or activities. If not, it is our policy to destroy the unsolicited information or ensure that the information is de-identified, provided it is lawful and reasonable to do so.

5 Using your personal information

The main purposes for which we collect, hold, use and disclose personal information are to provide property investment and property management services and to grow our business and investment portfolio.

We collect information to service our requirements. We can use your information to:

- evaluate potential lease transactions;
- evaluate property acquisitions and disposals;
- evaluate contractors and potential staff;
- provide and improve our properties and services;
- respond to your comments or queries;
- lease and licence our properties;
- collect information about use of our properties;
- manage employees, contractors and job applicants;
- carry out market and product analysis;

- deliver and enhance our services and properties;
- meet any purpose directly related to our work and for which you have provided consent (where it is reasonably required by law); and/or
- manage and run our website.

Data relating to your transactions with us may also be subject to any confidentiality agreement between you and us.

6 Purpose of collection

If we collect information for a purpose (the primary purpose), we will not use or disclose the information for any other purpose (the secondary purpose) unless:

- you would have consented to the use or disclosure of the personal information; or
- in relation to the use or disclosure of your information:
 - you would reasonably expect us to use or disclose your information for the secondary purpose and the secondary purpose is directly related to the primary purpose (sensitive information) or related to the primary purpose (not sensitive information);
 - use or disclosure is required or authorised under Australian law or a court/tribunal;
 - a permitted situation as defined in the APP exists in relation to our use or disclosure of the information;
 - a permitted health situation as defined in the APP exists in relation to use or disclosure of the information; or
 - we reasonably believe that the use or disclosure of the information is reasonably necessary for an enforcement related activity conducted by, or on behalf of, an enforcement body.

If we use or disclose your information because we reasonably believe that the use or disclosure of your information is reasonably necessary for enforcement related activities conducted by, or on behalf of, an enforcement body, we will make a written note of the use or disclosure.

7 Cookies

We do not collect personal or de-identified information from web users nor do we keep a record of your visit to our website or collect data from your browser. However our website may automatically collect information about you, including details of access, IP addresses, web statistics and other information which is required to ensure that the site is functioning properly.

8 Links to other websites

Links to third party websites that we do not operate or control may be provided for your convenience. We are not responsible for the privacy or security practices of websites that are not covered by this Privacy Policy. Third party websites should have their own policies which we encourage you to read before supplying them any information.

9 Do you have to provide personal information?

You can refuse to provide information. However a refusal may mean that the service you requested is not provided.

10 Sharing your personal information

We may use and disclose personal information for related purposes to third parties. Types of organisations to which we may disclose your information include:

- any of our related companies;
- anyone to whom our assets or business (or any part of it) is transferred;
- individuals appointed by a government responsible for the investigation and resolution of disputes or complaints concerning your use of our services;
- where you have otherwise consented;
- as otherwise required or authorised by law;
- government bodies such as ATO, ASIC, Australian Prudential Regulatory Authority and the police or courts (as required by law);
- professional or government organisations; and
- our contracted service providers who are bound by similar obligations of confidentiality including our consultants and marketers, information technology service providers, dealers and agents and professional advisers.

We do not rent, sell or exchange your information to third parties without your prior approval.

We do not use or disclose your personal information for the purpose of direct marketing.

11 Government Identifiers

We do not adopt, use or disclose government related identifiers (such as a Medicare number or licence number) as our own identifier.

12 Disclosing your personal information overseas

We do not disclose your personal information overseas.

13 Protecting your personal information

We store information in different ways, including paper and electronic form. We take reasonable steps to protect it from misuse, interference, loss, unauthorised access, modification or disclosure including:

- secure password protected databases for storage;
- confidentiality requirements of staff;
- security measures for access to our system;
- servers kept at a secure location with limited access;
- document storage security requirements;
- access controls for our building;
- limited provision of information to third parties and subject to guarantees about use; and
- employees are trained to deal with the information.

We cannot guarantee that personal information will be protected against unauthorized access or misuse and we do not accept any liability for the improper actions of unauthorised third parties.

We will retain your personal information for as long as necessary to fulfil our obligations to you, to protect our legal interests, to comply with an Australian law or as otherwise stated to you when we collected your information.

Once your information is no longer required, we will take reasonable steps to destroy your information or to ensure that your information is de-identified.

If a data breach occurs that raises a risk of unauthorised use or access to Personal Information that we hold, we will follow the requirements of the "Data Breach Notification" scheme under the Privacy Act. The requirements include notifying affected individuals and the Privacy Commissioner in some circumstances.

14 Accessing and correcting personal information

You can, upon request, access our records containing your information by contacting our Privacy Officer. We will generally provide you with access at no charge, unless one of the limited exceptions under the Privacy Act applies, in which case we will inform you of our reasons for refusal.

We will take reasonable steps to ensure our records of information are accurate, up to date and complete.

If you think there is something wrong with the information we hold about you please contact our Privacy Officer to let us know if there are any errors and keep us up-to-date with any changes, and we will try to correct your information.

If we refuse to correct your personal information, you may request that we associate your information with a statement that the information is inaccurate, out of date, incomplete, irrelevant or misleading. We will take reasonable steps to make the statement visible to users of your information.

15 Dealing with the Do not call register

We will not call you on a number listed on the Do Not Call Register unless it is permitted under the Do Not Call Register Act and related instruments.

If you do not wish to receive calls from us, please contact our Privacy Officer.

16 Resolving your Privacy Issues

If you have issues to discuss with us about how we have collected or managed your information please contact our Privacy Officer. For information about privacy or if your concerns are not resolved to your satisfaction, you may contact the Office of the Australian Information Commissioner at www.oaic.gov.au and on 1300 363 992.

17 Changes to this Privacy Policy

We may, from time to time, review and update this policy by publishing the updated version on our website, to take effect from the time of publication.

18 Our Privacy Officer

Our Privacy Officer can be contacted at:

Email: penelope.edwards@kadorgroup.com.au.

Telephone: 03 8624 1555

Fax: 03 8624 1550

Post: Level 26, 500 Collins St, Melbourne VIC 3000.