

1 About this Privacy Policy

This document sets out the policy of Kador Group Holdings Pty Ltd (ACN 006 443 643) (**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 whether at our office, via our website (www.kadorgroup.com.au) or via the real estate agents acting on 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. A printed copy of the privacy policy can be obtained free of charge by contacting our Privacy Officer.

2 Your Personal Information

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;
- evaluating contractors and potential staff;
- collecting business contacts and survey information;
- subscribing to a mailing list;
- using our website; and/or
- addressing requests for information about us or our investment portfolio.

The types of information we collect includes:

- name, age 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 Your Sensitive Information

Sensitive information is information about you that reveals your political opinions, philosophical beliefs or affiliations, membership of a professional or trade association, membership of a trade union, details of any criminal record.

It is our policy to only collect your sensitive information where it is reasonably necessary for our functions or activities and either you have consented or we are required or authorised under law to do so.

4 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;
- Australian Securities and Investment Commission (**ASIC**); and
- public sources (phone directories, membership lists, professional and trade associations, bankruptcy or court registry searches).

5 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.

6 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;
- delivering and enhancing our services and properties;
- 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.

We may collect data relating to your transactions with us subject to any confidentiality agreement.

7 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.

8 Cookies

We do not collect de-identified information from web users nor do we keep a record of your visit to our website or collect data from your browser.

9 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.

10 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.

11 Sharing your personal information

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

- 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 including 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.

12 Government Identifiers

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

13 Disclosing your personal information overseas

We do not disclose your personal information overseas.

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

15 Accessing your personal information

You can, upon request, access our records containing your information by contacting our Privacy Officer.

We will respond to your request to access your information within a reasonable period of time. On the basis that it is reasonable and practicable to do so, we will give you the access requested. If we refuse your request, we will provide a written notice setting out the reasons for the refusal and how you can complain about the refusal.

Reasons for a refusal may include if it:

- poses a serious threat to life, health or safety;
- would have an unreasonable impact on others' privacy;
- is frivolous or vexatious or unlawful;
- would reveal our intentions or prejudice negotiations;
- relates to legal proceedings;
- relate to commercially sensitive decision making.

When you make a request to access personal information, we will require you to provide some form of identification so we can verify that you are the person to whom the information relates.

16 Help us keep your information accurate

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

However, the accuracy of information depends to a large extent on the information you provide. If you do not give us all the information we require, or the information provided is inaccurate/incomplete, the products, services and information we provide may be affected.

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.

We will respond to your request to correct your personal information free of charge and in a reasonable period of time. If we refuse your request, we will provide you with a written notice setting out the reason for the refusal and the mechanisms available to complain about the refusal.

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.

If we do correct your personal information and have previously disclosed your personal information to a third party, upon your request, we will notify that third party of the correction unless impracticable or unlawful to do so.

17 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 calls from us, please contact our Privacy Officer.

18 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.

19 Changes to this Privacy Policy

We may, from time to time, review and update this policy. Changes to this Privacy Policy will not affect our use of previously provided information.

20 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.