

## Centuria Privacy Policy

October 2018

Version 1.0	Board approved 2011
Version 2.0	Board approved March 2014
Version 3.0	Board approved October 2018

This Policy has application to the following entities:

- Centuria Capital Limited
- Subsidiary entities of Centuria Capital Limited including: Centuria Funds Management Limited, Centuria Life Limited, Centuria Property Funds Limited, Centuria Property Funds No. 2 Limited Over Fifty Seniors Equity Release Pty Ltd, Centuria Healthcare Pty Limited and Centuria Healthcare Asset Management Limited.
- The Over 50s Guardian Friendly Society Limited.

(collectively referred to as 'Centuria')

Centuria recognizes the importance of safeguarding your privacy and are committed to complying with the Australian Privacy Principles which set the standard for how organizations should deal with personal information. The Australian Privacy Principles (the APPs) are found in amendments to the Privacy Act 1988 which are effective from 12 March 2014.

We trust that this Privacy Policy will help you to understand how Centuria collects, uses, discloses and manages your personal information.

This Policy is made available on the Centuria web site [centuria.com.au/privacy](http://centuria.com.au/privacy) and you may also request a free copy in an appropriate form.

You also have the option of not identifying yourself to Centuria or you may use a pseudonym. We can provide you with general information on Centuria and its products in these instances. You will be required to identify yourself where required by law or it is impractical not to do so. Examples include applying for or making a change to an investment, requesting personal information or lodging a complaint.

## What information do we collect?

The type of information collected by us will depend upon your relationship with Centuria and may include:

- name and title
- address
- contact details
- detail on entities through which you invest
- date of birth
- bank account details
- detail on your nominated beneficiaries (for friendly society bonds)
- shareholding details (for shareholders in Centuria Capital Limited)
- Taxation Identification Number e.g. Tax File Number.

## How we collect your information

In most cases, and wherever possible, Centuria will try to collect personal information only from you. Information will be collected through various company forms and from you directly, either in writing or verbally. We may also collect information about you from third parties, including:

- Financial advisers
- Outsourced registry providers
- Credit reporting bodies
- Public websites
- Contractors
- Tenants
- Other third parties you have authorized

## How your information is held

Your personal information is held in our registry systems for our investors and shareholders. These are either 3<sup>rd</sup> party specialist registry service providers or through an in-house registry system. Reverse mortgages borrower information is held internally and with external loan servicing and custodial service providers.

Generally personal information is stored electronically with hard copy records retained and archived with an archival service provider. Hard copies of leases and other agreements and contracts will be kept in a locked cupboard or fire proof safe (as required).

Generally, we do not combine or link other personal information held about you. The exception is when you notify us in an investment application that you have previously invested with us. In these situations, we will add the new investment to the existing client profile so that all investments are linked to under one client profile. Where available, we may also offer a service that will enable you to link your personal information when you have invested in different products across different Centuria subsidiaries so that you can choose to consolidate your investments in one online login etc.

All internal systems are subject to the security measures detailed in this policy. All external service providers are contractually required to hold personal information in accordance with the Privacy Act.

## How do we use your Personal Information?

Centuria collects personal information about you primarily:

- to provide you with the products and services you request
- to provide you with the information you request
- to verify your identity before transactions are processed, your instructions are carried out, or providing you with information about your investment
- to administer your financial product or loan
- to provide you with information about other products or services offered by Centuria or its related entities
- to respond to your enquiries or complaints
- to prepare internal reporting that includes identifiable customer information (e.g. customer sales or marketing information, complaints or issues reporting, registry operations reporting) to satisfy any legal requirements.

## Anti-Money Laundering and Counter Terrorism Legislation

The Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (AML/CTF Act) is aimed at addressing money laundering in Australia and the threat to national security caused by terrorism. This legislation requires us to collect identification information from investors into our investment products and reverse mortgage borrowers and to verify your identify from original or certified copies of specified documents or perform electronic verification. Details of what identification information and documentation you are required to provide are set out in transactional based forms. We may also contact you to follow up and clarify certain information.

Under this legislation we are also required to monitor transactions to identify any suspicious activity within any of our investment products.

As required under the AML/ CTF Act, we may, in our absolute discretion, without notice to you, disclose or otherwise report details of any transaction or activity, or proposed transaction or activity (including any personal information) to the relevant reporting body.

## Disclosure of Personal Information

Personal information held by Centuria may be disclosed to third parties such as:

- outsourced service providers, including administration, custodial and registry service providers; printers and mailing houses, information technology systems
- software providers, actuaries, professional advisers and research organisations
- business partners, including insurance underwriters
- government agencies including APRA, ASIC, AUSTRAC, Centrelink, Office of the Australian Information Commissioner (OAIC) or the ATO
- related companies
- credit reporting bodies, where a person is in default in relation to loan or other credit arrangements;
- financial intermediaries such as financial planners and taxation or accounting advisers
- other third parties you have authorised to receive your personal information.

Where Centuria contracts with an outsourced service provider or business partner we take reasonable steps to protect the privacy of any information disclosed to them. This includes inserting confidentiality provisions and a requirement to comply with the Privacy Act in our contractual arrangements.

## Disclosure to entities in other countries

Centuria's registry and administration service provider for its friendly society business may perform or engage parties who are located overseas to perform certain services overseas including back-office and anti-money laundering counter-terrorism financing screening services. As a result, personal information collected by Centuria may be disclosed to a recipient in a foreign country. The countries in which such overseas recipients are likely to be located are the United Kingdom, New Zealand, the United States of America, Canada, Singapore, The Netherlands and India.

Centuria's registry and administrative service provider is contractually required to takes reasonable steps to ensure the overseas recipients comply with the APPs. This is achieved by implementing contractual arrangements with overseas service providers to ensure the personal information is appropriately safeguarded and to ensure that these overseas service providers comply with the APPs.

## Credit reporting

If you make an application for credit, Centuria can access a copy of your individual credit report from a Credit Reporting Body (CRB) to help us make a decision about whether or not to grant the application.

We may also disclose your credit information to a CRB if you fail to meet your payment obligations to us, or if you commit a serious credit infringement, in relation to consumer credit for our products or services.

In turn, the CRB may include your personal information in credit reporting information they provide to other credit providers.

## Declining Product or Service Offers (Opting-out)

From time to time Centuria may wish to use your information to tell you about other products, services or special offers that we think may be of interest to you. Please let us know if you do not want to receive these offers by contacting us using the contact details noted below or selecting the unsubscribe option in an email.

## Quality of Information

Centuria aims to ensure that the personal information we retain about you is accurate, complete and up to date. Please provide us with complete and accurate information and keep us informed of any changes in your details such as a change of address.

If you do not provide all or part of the personal information that we request, we may not be able to contact you or to administer your investment properly.

If you believe that the information we hold about you is inaccurate please contact us directly using the contact details provide below, so that we can update our records.

## Security of Information

Centuria will at all times take steps to protect your personal information from misuse, loss, unauthorised access, modification or disclosure. Your personal information is treated as confidential.

Employees and contractors of the Centuria are bound by confidentiality obligations. Passwords, firewalls and virus protection are used by Centuria with a view to ensuring the security and integrity of the information technology systems that hold your information.

All premises housing our systems and other copies of your information are monitored and protected by security alarms and access card or key lock entry. Service providers who hold personal information are contractually required to hold information in accordance with the Privacy Act and Centuria obtains periodic confirmation of adequate information security management.

## DATA Breaches Notification

We will promptly notify you if we are aware of or have reasonable grounds to believe that your Personal Information held by us is involved in an eligible notifiable data breach and involves Personal Information being lost or subjected to unauthorised access or unauthorised disclosure which is likely to result in serious harm. Our notification to you will include recommendations about the steps you

should take in response to the breach, and will not be anytime longer than 30 days from when the determination has been made by our management that the breach may cause serious harm. We will also notify the **OAIC** of the data breach.

Our assessment and escalation of such breaches will be in done in accordance with our Incident & Breach Reporting policy and procedures.

## Your Rights of Access and Correction

You are entitled to obtain access to your personal information subject to some exceptions allowed by law. You may also request that Centuria correct or update information that we hold on you. We encourage our customers to ensure that their personal information is accurate and up to date, particularly mailing address and contact details. We include regular reminders in correspondence with our customers.

If you wish to make a request for access to your personal information, please contact us using the contact details below.

## Contact Details

### Property investors and shareholders of Centuria Capital Limited

Centuria has appointed BoardRoom Pty Ltd as its registry provider for all of Centuria's unlisted and listed property funds and Centuria Capital Limited (ASX: CNI) and to assist investors with their enquiries.

Phone (within Australia)	1800 182 257
Phone (outside Australia)	+612 9290 9689
Fax	+612 9279 0664
Email	<a href="mailto:enquiry@CenturiaInvestor.com.au">enquiry@CenturiaInvestor.com.au</a>
Website	<a href="http://www.CenturiaInvestor.com.au">www.CenturiaInvestor.com.au</a>
Mail	Level 12, 225 George Street, The Rocks, NSW 2000

### Centuria Life and all other privacy enquiries

Phone: 1300 50 50 50 during business hours, or by writing to Centuria Investor Services, GPO Box 3993, Sydney, NSW 2001 or email [enquiries@centuria.com.au](mailto:enquiries@centuria.com.au).

## Complaints

If you wish to make a complaint about a possible breach of privacy or how we have handled your personal information, please contact us on 1300 50 50 50 during business hours or address your complaint to the Complaints Manager, Centuria Capital Limited, Level 41, Chifley Tower, 2 Chifley Square, Sydney NSW 2000 or email [compliance@centuria.com.au](mailto:compliance@centuria.com.au).

Centuria will acknowledge your complaint in a prompt manner and investigate. We will contact you to advise the outcome and aim to resolve the complaint within 30 days. If you are not satisfied with our response, you may also be able to lodge a complaint with the OAIC.