

## PRIVACY POLICY

### 1. PURPOSE AND SCOPE

This Policy is applicable to GFM Investment Management Limited and its related entities (GFM).

GFM is the holding entity behind the Home build-to-rent brand. GFM acts as the Trustee for the Home Fund, developing and managing projects on behalf of institutional investors.

GFM is committed to protecting the privacy of personal information and complying with the Australian Privacy Principles contained in the Privacy Act 1988 and the Privacy Amendment (Enhancing Privacy Protection) Act 2012.

This policy describes how GFM complies with the privacy requirements in protecting the personal information GFM holds concerning individuals.

### 2. PERSONAL INFORMATION

Where this Privacy Policy refers to “personal information”, it means information about an individual from which their identity is apparent or can reasonably be ascertained. An individual's name and address are examples of personal information.

### 3. COLLECTION OF PERSONAL INFORMATION

The type of personal information that GFM collects will depend upon the relationship and dealings the relevant individual may have with GFM. GFM may collect and hold information about:

- individuals as purchasers or potential purchasers;
- individuals as tenants;
- suppliers (for example, when establishing records and systems for the payment for goods);
- job applicants;
- individuals as contractors (for example, when establishing records and systems for payment for services);
- individual investors (for example, due diligence information); and
- other individuals who may come into contact with GFM.

GFM only collects personal information necessary for its functions and activities. GFM will not collect personal information in an unfair, unlawful or unreasonably intrusive manner. The types of personal information collected may include, but are not limited to:

- information which identifies the individual (for example, name, address, contact details, date of birth);
- information about the individual's financial position; and
- information about the individual that is required or authorised by law.

The Privacy Act imposes restrictions on collecting sensitive personal information (this includes information about religious views, ethnicity, political opinions, personal health information). GFM generally does not collect sensitive personal information about an individual. GFM may collect some sensitive information if it is necessary to allow GFM to deal with the individual and the individual has provided their consent.

Generally, GFM tries to collect personal information directly from individuals. However, there are certain situations in which GFM may collect personal information about individuals from other sources. In either case, GFM will take reasonable steps to ensure the individual is aware of the purposes for which the information is collected.

### 4. USE AND DISCLOSURE OF PERSONAL INFORMATION

GFM will use and disclose personal information for purposes related to why the information was collected, or where the individual has consented to its use or disclosure.

For example, GFM may provide personal information to our service providers. These may include companies which help GFM with data processing and data analysis. GFM will only disclose personal information to those third-party service providers on a confidential basis so that the service provider can work effectively.

Personal information may be shared between companies within the GFM group. In those cases, the purpose for which the information was originally collected will be taken into account.

GFM may otherwise use or disclose personal information where required or authorised to do so by law, which may include emergency situations and assisting in law enforcement.

GFM may also use or disclose the information collected for any other related purpose for which the individual would reasonably expect it to be used.

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

- providing products or services that have been requested;
- communicating with individuals;
- providing ongoing information about GFM products and services to individuals which GFM believes may be interested;
- complying with regulatory and legal obligations; and
- recruiting employees and contractors.

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

- GFM's contractors and service providers who assist GFM in the operation of its business or to provide a customer service;
- joint venture partners;
- third party lenders and insurers;
- the Australian Securities and Investments Commission and to other government agencies as agreed to or required by law; and
- anyone authorised by a provider of personal information.

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

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

# RICHMOND

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## PRIVACY POLICY

### 5. MARKETING

GFM may send marketing materials to its customers or potential customers where GFM has collected the personal information from the individual and the marketing material is related to the purpose for which the information was collected.

The individual's prior consent will be obtained before personal information is used for marketing purposes in situations where the personal information has not been collected directly from the individual or where sensitive information is involved.

If the customer no longer wishes GFM to use his or her personal information for marketing materials, the customer is to advise GFM's Company Secretary.

### 6. APPLYING FOR EMPLOYMENT WITH GFM

GFM collects personal information from individuals who submit applications or register interest for employment with GFM. If the application is unsuccessful, at the conclusion of the interview process correspondence created during the recruitment process including resumes relating to the unsuccessful candidates will be destroyed. GFM may retain the information in case a more appropriate opportunity becomes available. The unsuccessful applicant may contact GFM's Company Secretary to request GFM not to retain the applicant's information.

### 7. SECURITY OF PERSONAL INFORMATION

GFM takes reasonable steps to prevent the personal information it holds from being misused or lost and from unauthorised access, modification or disclosure. This protection applies in relation to information stored in both electronic and hard copy form. GFM maintains physical security measures over its physical premises, and a range of computer and network security measures over its electronic systems. GFM employees are required to maintain the confidentiality of any personal information held.

Data transmission over the telecommunications system or the Internet cannot be guaranteed to be totally secure.

### 8. ACCESS TO & CHANGING PERSONAL INFORMATION

GFM takes reasonable steps to ensure the personal information it collects, uses and discloses is accurate, complete and up-to-date.

If an individual needs to access or correct any personal information GFM holds, he or she may contact a People & Culture Manager (internal) or the Company Secretary. Individuals should provide as much detail as possible about the particular information sought, in order to help GFM retrieve it.

An access fee may be charged to cover GFM's costs of providing the information. In the event GFM incurs costs to retrieve or source information, some or all costs may be transferred to the employee.

If GFM disagrees with the individual that the personal information should be changed, GFM will provide the individual with the reasons for doing so. The individual has the right to request that a statement be associated with their personal information noting that they disagreed with its accuracy.

### 9. CHANGES IN THE FUTURE

GFM reserves the right to change this Privacy Policy at any time. Any changes will be notified by posting an updated version on the GFM website at [www.homeapartments.com.au](http://www.homeapartments.com.au).

### 10. COMPLAINTS

Individuals who have any questions or feedback about privacy, or who wish to make a complaint, or who would like to know which entities are part of GFM, may contact the Company Secretary.

You may also contact the Office of the Australian Information Commissioner as follows:

Phone: 1300 363 992

Web: [www.oaic.gov.au](http://www.oaic.gov.au)

Address: GPO Box 5218, Sydney, NSW 2001

### 11. CONTACTING GFM

The Company Secretary can be contacted as follows:

Email: [info@homeapartments.com.au](mailto:info@homeapartments.com.au)

Address: Company Secretary, GFM Group Compliance, Level 1 (Studios), 600 Bourke Street, Melbourne, Vic 3000

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# TRADERS