



1. INTRODUCTION

This Privacy Policy applies to EG Group. The *Privacy Act 1988* (Cth) (**Privacy Act**) includes a set of Australian Privacy Principles that govern how private sector organisations should collect, use, store and disclose personal information.

EG Group is a real estate and non-bank lending funds management group, based in Australia. This policy outlines how EG Group handles, collects, processes, records, stores and discloses personal information and how EG Group complies with the Australian Privacy Principles.

1.1 KEY INTERNAL OBLIGATIONS UNDER THIS POLICY

The key obligations of EG Group under this Privacy Policy are set out as below:

Obligation	Timing	Reference
Compliance Officer to review policies and procedures including a review of the collection, storage and disclosure of private information.	Annually	1.2

1.2 UPDATING OF POLICY

The Compliance Officer will be responsible for reviewing this Privacy Policy including associated procedures on a regular basis and updating them at least annually. Any changes to this policy must be approved by the boards of EGFM and EGCF.



2. WHAT KINDS OF PERSONAL INFORMATION DOES EG GROUP COLLECT

Personal information is information or an opinion about an identified, or reasonably identifiable, individual.

The kinds of personal information that EG Group collects will vary depending on the particular interaction or dealing with an individual. For example:

- EG Group has access to personal information about people who have invested in EG Group products; and
- EG Group also collects personal information from potential investors who register their details on EG Group's website, provide it as a part of any marketing or sales campaign, or complete IMs for EGPW Syndicates.

The majority of personal information recorded relates to existing and potential investors. EG Group's records with respect to investors will generally include name, contact details, job description, birth date, details of transactions with EG Group including information about their interests in our products and/or investments. For potential individual investors who complete IMs for EGPW Syndicates, we collect additional personal information including passport details, drivers licence, Medicare details, bank account details.

Under the Privacy Act, certain types of personal information are regarded as sensitive and must be treated with a higher standard of care. This includes information relating to health, racial or ethnic origin, political persuasions or religious beliefs. EG Group generally does not collect this type of information. If EG Group does need to collect sensitive information, EG Group will only do so with consent or where required to do so by law.

3. HOW EG GROUP COLLECTS PERSONAL INFORMATION

Many parts of EG Group's business deal with personal information that has been collected from clients and potential clients. EG Group generally collects personal information directly during the investment process (including enquiries about EG Group's services), when EG Group's website or online services, or through surveys or marketing campaigns.

EG Group may sometimes collect personal information indirectly from several sources, including: professional advisers, investors, potential investors and investees, employees, consultants, contractors and sub-contractors. Generally, EG Group will only collect personal information from indirect sources if it is unreasonable or impracticable to collect that personal information directly.

There is no obligation to provide personal information to EG Group. However, without certain personal information, EG Group may not be able to provide products, services or information or may be limited in how it can interact with a person.



4. PURPOSES FOR COLLECTING, USING AND DISCLOSING PERSONAL INFORMATION

EG Group only collects, uses or discloses personal information to the extent reasonably necessary to perform its functions and for any other purposes described in this policy. In handling personal information that belongs to investors and potential investors, EG Group processes this information for the purpose of providing the products that the investor has requested. EG Group processes personal information relating to investors to better understand their needs and in some cases to provide them with information about EG Group products.

Some examples of the purposes for which EG Group collects, holds, uses and discloses personal information include to:

- respond to inquiries by the relevant person;
- enable EG Group to supply a person with information requested from EG Group;
- personalise a person's experience with EG Group's services;
- conduct events or competitions (if any);
- contact people to obtain their feedback regarding products or services or to conduct other market research;
- undertake direct marketing (as detailed below; including any newsletters for EG Group);
- analyse information EG Group has collected so that it can administer, support, improve and develop its business and the products and services it offers; and
- comply with its obligations under any applicable laws.

For potential individual investors who complete Investment Memoranda for EG Group funds, we collect additional personal information including passport details, drivers licence, Medicare details, bank account details. These further details are to assist in the 'know your customer' identification process in compliance with the *Anti-Money Laundering and Counter Terrorism Financing Act*. These details are securely stored and access is strictly limited to certain EG Group personnel related to the relevant fund.

In addition to the purposes listed above, EG Group may use personal information for other purposes which it will notify investors or users of when it collects the information, and for purposes otherwise permitted or required by law.



5. DISCLOSING PERSONAL INFORMATION

EG Group will disclose personal information for the purposes set out above in section 4. In addition, personal information may be disclosed:

- when required by law;
- when it is required to implement EG Group's services;
- when EG Group believes it necessary to provide a purchaser with a product that they have requested;
- to services providers, contractors and other third parties that provide products or services to EG Group (including technology service providers or administration service providers) to facilitate or assist EG Group in providing services to its clients and investors;
- if it is necessary to protect the rights, property or personal safety of another EG Group investor, any member of the public or EG Group staff; or
- if the assets and operations of EG Group's business are transferred to another party as a going concern.

EG Group will generally disclose personal information to its service providers or contractors, including technology service providers, located in Australia. EG Group does not currently disclose personal information to third parties located overseas.

EG Group takes reasonable steps to ensure that any overseas recipients do not hold, use or disclose personal information in a way that is inconsistent with the obligations imposed under the Privacy Act and the Australian Privacy Principles.

6. MARKETING AND COMMUNICATIONS

Marketing is an integral aspect of EG Group's growth and success. EG Group offers investors a diverse range of specialised investment products. EG Group uses contact lists and other personal information to promote new investment products, services or other offers which may be of interest to investors. This is in addition to the purposes for using, collecting, or disclosing personal information outlined elsewhere in this policy.

When personal information is provided to EG Group's staff, the information provider is asked whether or not they wish to receive further information about new investment products or news updates about EG Group in general. EG Group may also disclose personal information or promotional/marketing information to third parties or other entities with which EG Group has a commercial relation or arrangement, for the purpose of the other entity contacting investors for direct marketing.

Investors and third parties receiving promotional information and/or other communications from EG Group may decide to opt out of the regular updates and are free to do so by contacting the Privacy Officer using the details in section 13. The request will be processed within 10 business days.



7. ACCESSING AND CORRECTING PERSONAL INFORMATION

EG Group ensures reasonable efforts are taken to keep any personal information up to date and accurate. If access by a particular party is required to any personal information that is held on EG Group's systems, or changes to existing information need to be implemented or information needs to be permanently deleted from the records, the party in question may contact the Privacy Officer using the details in section 13. The request is processed within 10 business days.

Upon request, a party may access their information on EG Group's systems within 14 business days. EG Group will grant access to the extent required or authorised by the Privacy Act or other law and take steps reasonable in the circumstances to correct personal information where necessary and appropriate. In some cases, EG Group may need to impose a charge for providing access to personal information. This charge reflects the administrative cost associated with compiling the information.

8. DELETION OF INFORMATION

A party may request all personal information kept on EG Group's systems to be deleted within 10 business days. Otherwise, EG Group will destroy or de-identify personal information in circumstances where it is no longer required. EG Group will take all reasonable steps to delete the information from all sources on its systems (except electronic backups), unless the information is required for legal reasons. Personal information may also be retained in certain files in order to resolve disputes or for auditing purposes.

9. STORAGE AND SECURITY

EG Group understands the importance of information security and endeavours to take all reasonable steps to protect any information stored electronically or otherwise from misuse, interference and loss, or from unauthorised access, modification or disclosure. EG Group requires all staff and service providers to respect the confidentiality of any personal information held on its systems. Strict penalties apply if staff or service providers disclose personal information, without written consent from the respective party.

The EG Group website is hosted in Australia in secure, accredited facilities. To help protect the privacy of data and personal information collected and held by EG Group, it maintains physical, technical and administrative safeguards. EG Group updates and tests its security technology on an ongoing basis.



10. WEBSITE

No personal information is kept on EG Group's web servers, due to the difficulty of maintaining security across the world wide web. EG Group does not collect any personal information through the official EG website.

To improve user experience on the EG Group website, the website may use 'cookies'. Cookies are an industry standard and most major web sites use them. A cookie is a small text file that our site may place on your computer as a tool to remember your preferences. Users may refuse the use of cookies by selecting the appropriate settings on their browser, however please note that if this is done then the full functionality of the website may not be useable.

The EG Group website may contain links to other websites. Please be aware that EG Group is not responsible for the privacy practices of other sites. When a user goes to other websites from the EG Group, it is recommended to be aware of and read the privacy policy of that other website.

The EG Group website uses Google Analytics, a service which transmits website traffic data to Google servers in the United States. Google Analytics does not identify individual users or associate an IP address with any other data held by Google. EG Group uses reports provided by Google Analytics to help EG Group understand website traffic and webpage usage.

By using the EG Group website, a user consents to the processing of data about themselves by Google in the manner described in [Google Privacy Policy](#) and for the purposes set out above.

eg.com.au also uses interfaces with social media sites such as Facebook, LinkedIn, Twitter and others. If a user chooses to "like" or "share" information from the EG Group website through these services, the user should review the privacy policy of that service. If the user is a member of a social media site, the interfaces may allow the social media site to connect that user's visits to the EG Group website with other personal information.

11. FUTURE CHANGES

EG Group's commitment to remaining a leading funds manager means that the business will continue to evolve as it introduces new products for investors. As a result, this Privacy Policy may be reviewed from time to time. EG Group reserves the right to change its Privacy Policy and insert an updated version of the policy on its website. In doing so, EG Group will provide advance notice (if reasonably practicable) about the changes, including notice on its website or via email. The amended Privacy Policy will apply to you if you continue to engage with EG Group.

12. PRIVACY COMPLAINTS

Please direct all privacy complaints to EG Group's Privacy Officer. At all times, privacy complaints will:

- be treated seriously;
- be dealt with promptly;



- be dealt with in a confidential manner; and
- not affect your existing obligations or affect the commercial arrangements between you and EG Group.

EG Group will acknowledge your complaint within 7 days of receipt and endeavour to resolve it within 30 days, unless EG Group informs you otherwise and seeks your agreement in writing.

EG Group's Privacy Officer will commence an investigation into your complaint. You will be informed of the outcome of your complaint following completion of the investigation. In the event you are dissatisfied with the outcome of your complaint, or an extension to the time in which EG Group will resolve it, you may refer the complaint to the Office of the Australian Information Commissioner.

13. CONTACTING US

For further information or enquiries regarding your personal information, or if you would like to opt-out of receiving any promotional or marketing communications or make a privacy complaint, please contact EG Group's Privacy Officer using any of the following contact details:

Phone: +61 2 9220 7000
Address: Level 21, 1 Farrer Place, Sydney, New South Wales
Website: <https://www.eg.com.au/>