

EG Group Privacy Policy

1. Introduction & Scope

EG Group ("EG", "we", "our", "us") is committed to protecting the privacy of personal and financial information collected in connection with our property and funds management activities.

This Privacy Policy explains how we collect, hold, use, disclose, and protect personal information in accordance with the *Privacy Act 1988* (Cth) (**Privacy Act**) and the Australian Privacy Principles (**APPs**). The Office of the Australian Information Commissioner (OAIC) is the independent national regulator for privacy and freedom of information.

The APPs can be found at its website: www.oaic.gov.au/privacy/australian-privacy-principles

There are 13 APPs which govern standards, rights and obligations around:

- the collection, use and disclosure of personal information
- an organisation's governance and accountability
- integrity and correction of personal information
- the rights of individuals to access their personal information.

2. What Personal Information We Collect (APP 3, 10)

We collect personal information relevant to our investment, advisory, and property management functions, including:

- Identification details
- Financial and investment information
- AML/CTF verification data in accordance with the *Anti-Money Laundering and Counter Terrorism Financing Act 2006* (Cth) (**AML/CTF Act**)
- Employment and professional information
- Property transaction information
- Digital identifiers such as IP addresses and analytics data

We take reasonable steps to ensure the information we collect is accurate, up-to-date, complete, and relevant.

3. Unsolicited Information (APP 4)

If we receive personal information that we did not request, we will determine whether it is reasonably necessary for our functions. If not, we will securely destroy or de-identify it as required.

4. Anonymity and Pseudonymity (APP 2)

Where lawful and practicable, individuals may interact with us anonymously or using a pseudonym. However, due to obligations under the AML/CTF Act and financial services laws, we generally cannot provide investment services without verifying identity.

5. How We Collect Personal Information (APP 3, 5)

We collect information from:

- Direct interactions (forms, calls, meetings, email)
- Website and digital platforms
- Third parties such as custodians, advisers, and service providers

At or before the time of collection, we inform individuals about:

- The purpose of collection
- Whether collection is required by law
- What happens if information is not provided
- Who we usually disclose information to
- How to access and correct information
- How to make a complaint

6. Why We Use and Disclose Personal Information (APP 6)

We use and disclose personal information for purposes including:

- Managing investments and property assets
- Meeting AML/CTF, ASIC, ATO, and *Corporations Act* obligations
- Communicating with investors
- Conducting research and improving services

We only use or disclose information for the purpose for which it was collected, a related purpose reasonably expected, or where authorised or required by law.

7. Government Identifiers (APP 9)

We do not adopt, use, or disclose government identifiers such as Tax File Numbers or Medicare numbers except as permitted under the Privacy (Tax File Number) Rule 2015 or other applicable laws.

8. Direct Marketing (APP 7)

We may use personal information to provide updates on EG products, services, events, and market insights. Individuals may opt out at any time.

We do not sell or disclose personal information to third parties for their marketing purposes.

9. Cross-Border Disclosure (APP 8)

We may disclose personal information to service providers or related entities located overseas, including in:

- Philippines
- Japan
- and any other countries used by IT or administration providers

We take reasonable steps to ensure overseas recipients handle the information in a manner consistent with the APPs, including through contractual safeguards.

10. Data Security and Retention (APP 11)

We use physical, electronic, and procedural safeguards to protect information from misuse, interference, and loss.

Access is restricted to authorised personnel.

We retain information for as long as required by law or business need. AML/CTF and financial services laws may require retention for at least 7 years.

Information no longer required is securely destroyed or de-identified.

11. Data Breach Response

EG maintains a Data Breach Response Plan.

If a breach is suspected, we will:

- Assess the incident as soon as practicable (within 30 days)
- Notify affected individuals and the OAIC where required
- Take corrective measures to prevent recurrence

All breaches are documented, whether notifiable or not.

12. Access and Correction (APP 12, 13)

Individuals may request access to, or correction of, the personal information we hold.

Requests should be submitted to privacy@eg.com.au.

We respond within a reasonable period (typically within 30 days).

13. Cookies and Digital Technologies

We use cookies and analytics tools to enhance website functionality and measure traffic.

Individuals may disable cookies, though some features may not function.

Some analytics tools may transfer data overseas; such transfers are managed in accordance with APP 8.

14. Updates to This Policy

We may update this policy periodically.

The current version is available at www.eg.com.au/privacy.

Material changes will be communicated to investors.

15. Contact and Complaints

Privacy Officer
EG Group
Level 21, 1 Farrer Place, Sydney NSW 2000
Phone: +61 2 9220 7000
Email: privacy@eg.com.au

We respond to complaints within 30 days.

If unresolved, individuals may contact the OAIC at www.oaic.gov.au.