



Clarence Property Aged Care Fund – Investor Portal

General

Clarence Property Corporation Limited (Clarence Property, we, us, or our) provides the online investor portal (Investor Portal, and overall our Services) for investors to consider, invest and monitor the performance of investment opportunities created, managed, or administered by us or another company in the Clarence Property group.

At Clarence Property, your privacy is important and we are committed to protecting the personal information we collect from you. The Privacy Act 1988 (Cth) (Privacy Act), Australian Privacy Principles and any registered privacy codes govern the way in which we must manage your personal information. This policy sets out how we collect, use, disclose and otherwise manage your personal information.

Collection

We collect personal information from customers (existing and prospective), suppliers, contractors, prospective employees, visitors to our shopping centres and other properties, individuals who publish commentary in relation to us and/or our properties, and other individuals for the purposes set out below.

Types of information collected

We may collect and hold personal information about you, that is, information that can identify (or reasonably identify) you.

The kinds of information we typically collect include name, gender, address, phone number, email address, facsimile number, bank account details, tax file numbers, information about your employment, information required as part of a recruitment process, information about your dealings with us or other information relevant to providing you with the services and products you are, or someone else you know, is seeking. In relation to our investment portal, we may also collect the following:

- tax residency status and citizenship;
- information about your bank account details and financial and personal circumstances, including your source of funds (in some cases evidence of this), and transactional and financial information relating to your user account;
- documents that verify your identity and other personal details; and
- other information which assists us in conducting our business, providing and marketing our services and meeting our legal obligations.

Method of collection

We collect personal information in a range of ways. Personal information will generally be collected directly from you through our interactions with you, including the use of any of our standard forms, our website, via email, via your use of the Wi-Fi services at our properties, camera surveillance and CCTV systems on our properties, your use of our mobile or digital applications, or through a telephone conversation with you.

There may, however, be some instances where personal information about you will be collected indirectly because it is unreasonable or impracticable to collect personal information directly from you. We will take reasonable steps to ensure you are aware that we have collected personal information about you and the circumstances of the collection.

In respect of our Investor Portal:

Information that comes directly from you. This is the Personal Information about you that you enter into the Investor Portal or Services yourself, including any Personal Information you provide through the registration or investment process, through any contact with us (e.g. telephone calls, face to face meetings, Investor Portal enquiry forms or emails, or through the use of the services and facilities available through our websites and social media channels) or when you use the Services. If you don't want to provide your Personal Information, you don't have to, but it may restrict the function of some parts of the Investor Portal or Services.

Information we receive from third parties. We may receive Personal Information about you from third parties, for example:

- your financial or professional advisor;
- we may use third parties to analyse traffic at our Platform, websites and social media channels, which may involve the use of cookies;
- where a third party provides security-related or identity verification services;
- in some circumstances we might collect Personal Information about an individual from a third party (for example, an employment reference from another person and, including without limitation, for the purposes of our compliance with our anti-money laundering and sanctions compliance obligations); and
- from publicly available websites.

Information we receive from your use of the Investor Portal and Services. Some Personal Information is automatically collected when you perform any action on, or interact with, any part of our Investor Portal or Services, including:

- clickstream data, which is a record of how you navigate or click through our Investor Portal or Services; and
- information obtained through the use of cookies, web beacons and similar storage technologies. Please refer to the section of this privacy policy entitled "Cookies and Tracking" for further information, including information on how you can disable these technologies.

Whenever you lodge a support query using our "Help" or "Contact us" features on the Investor Portal, we collect your name and email address, in order to be able to reply to you and provide the support or advice requested.

Purpose of collection

The personal information that we collect and hold about you, depends on your interaction with us. Generally, we collect, use and hold your personal information if it is reasonably necessary for or directly related to the performance of our functions and activities and for the purposes of:

- providing services and products to you or someone else you know;
- visiting our shopping centres and/or other properties;
- obtaining products, services or information from our suppliers;
- providing you with marketing information or conducting marketing campaigns, including newsletters and emails about other services and products we offer which may be of interest to you, including future investment opportunities;



- responding to your enquiries;
- managing our website, social media and other communications;
- processing and assessing employment applications;
- enforcing or obtaining advice on agreements between or other matters involving you and us;
- facilitating our internal business operations, including the fulfilment of any legal requirements;
- implementing appropriate security, risk management, loss prevention and incident investigation systems and activities; and
- analysing our services and products with a view to improving those services and products.

In respect of our Investor Portal, we collect, hold and use your Personal Information:

- to create and manage your User Account within the Investor Portal;
- to review your eligibility to create or continue to use a User Account with us;
- to process your application to become an investor and other matters in connection with the operation of the Investor Portal and your User Account, including, without limitation, transfers, deposits, payments, generating reports and record keeping of investment portfolios;
- to provide our Investor Portal and Services and otherwise carry out our obligations under the Terms; and
- to bill you (or the Investment Entity on whose behalf you are acting) and to collect money that is owed.

Such collecting, holding and use is necessary for the performance of the contract between you (or the Investment Entity on whose behalf you are acting) and us.

We also collect, hold and use your Personal Information:

- to verify your identity, including (as applicable):
 - to check your identity against databases maintained by Government agencies and other databases (for example, the Document Verification Service maintained and provided by the Commonwealth of Australia);
 - to identify, prevent or investigate any actual or suspected fraud, unlawful activity or threats to our systems; and
 - to comply with our legal obligations, including (but not limited to) in relation to our anti-money laundering and counter-terrorism financing obligations and general tax regulation.
- to communicate with you (including responding to feedback and information requests relating to our Investor Portal and the Services, to let you know when we are experiencing technical difficulties, and to alert you of new features or developments);
- to communicate with, and comply with our obligations to, our third-party service providers, suppliers and other users of our Investor Portal and/or Services;
- to send administrative messages, reminders, notices, updates, security alerts, and other information relevant to your use of the Investor Portal and/or the Services;
- to engage third parties on your behalf;
- to track access to the Investor Portal and Services in order to help detect and prevent any fraudulent or malicious activity;
- to analyse and report on usage of the Investor Portal and Services, so we can improve the Investor Portal and Services;
- to send you (or Investment Entity on whose behalf you are accessing the Investor Portal) marketing and promotional messages and other information that may be of interest to you where you (or the Investor Entity on whose behalf you are accessing the Investor Portal) have consented to receiving such material. You can opt out of receiving marketing materials from us by using the opt-out facility provided (e.g. an unsubscribe link) or by emailing us at invest@clarenceproperty.com.au;



- to keep you informed of investments we consider may be of interest to you, unless you ask us not to provide you with this information;
- to protect and/or enforce our legal rights and interests, including defending any claim; and
- to comply with our legal obligations, including (but not limited to) in relation to our anti-money laundering and counter-terrorism financing obligations, and general tax regulation. This may include any notification and reporting obligations and any access directions imposed on us by an applicable Government agency, law enforcement agency or regulatory authority.

Except as otherwise permitted by law, we only collect sensitive information about you if you consent to the collection of the information and if the information is reasonably necessary for the performance of our functions, as set out above.

Failure to provide information

If the personal information you provide to us is incomplete or inaccurate or you do not provide us with the personal information we request, we may be unable to provide you, or someone else you know, with the services and products you, or they, are seeking.

Internet users

If you access our website, we may collect additional personal information about you in the form of your IP address or domain name. Our website may contain links to other websites. We are not responsible for the privacy practices of linked websites, and any linked websites are not subject to our privacy policies and procedures.

Our website uses cookies. The main purpose of cookies is to identify users and to prepare customised web pages for them. Cookies do not identify you personally, but they may link back to a database record about you. We use cookies to monitor usage of our website and to create a personal record of when you visit our website and what page you view so that we may serve you more effectively.

Our website uses analytics, provided by Google Inc. (Google) and Zoho Corporation (Zoho). Analytics uses cookies and JavaScript code that enables analysis on your usage of our website and data will be transmitted to and stored on Google or Zoho's servers. Your data may be used to compile reports on your usage of our website and provide services relating to website activity and internet usage. We will use the analytics data collected to improve the functionality of our website and services.

Use and disclosure

Generally, we only use or disclose personal information about you for the purposes for which it was collected (as set out above). We may disclose personal information about you to:

- your professional advisers, your authorised signatories and your agents;
- other members of the Clarence Property group, including its subsidiaries (if any) and related parties;
- service providers and suppliers who provide necessary goods and/or services to us (including identity checks), and any other partners who help us market and sell the Investor Portal and/or the Services - for instance to manage customer relations, send out newsletters and/or to process payments;
- any business that supports us, including financial institutions and payment service providers, marketing service providers, third parties who assist with claims management and injury management services, and parties who assist with hosting or maintaining any underlying software, IT system or data centre that we use to provide our Investor Portal and/or Services;



- a third party who assists us in providing services under either our Australian Financial Services Licence or under a corporate authorised representative arrangement with another Australian Financial Services Licensee;
- third parties who assist with claims management and injury management services;
- related entities and other organisations with whom we have affiliations, so that those organisations may provide you with information about services, products, future investment offers, upcoming projects and various promotions;
- other companies, agencies or individuals that maintain databases against which your identity may be verified, which may include (but is not limited to) the Commonwealth of Australia Document Verification Service;
- our professional advisers (such as our lawyers who assist us to ensure we are complying with our legal obligations), and banks and other financial institutions as part of our obligations when paying or receiving funds on your behalf;
- social media sites on which we have a presence, to the extent that you interact with us via a social media site. We limit interactions on social media sites that may disclose Personal Information to the private messaging functions of those sites, unless you otherwise request or give permission;
- anyone who assists us to identify, prevent or investigate fraud, unlawful activity, misconduct or threats to our systems;
- other third parties to anonymise and aggregate statistical information;
- a person who can require us to supply personal information (e.g. a Government agency, regulatory authority or law enforcement agency);
- respond to due diligence requests and/or transfer personal information in the case of a sale, merger, consolidation, liquidation, reorganisation or acquisition of our business; and
- any other person or entity authorised by you.

We may also disclose your Personal Information to others outside our group of companies where:

- we are required or authorised by law to do so;
- you may have expressly consented to the disclosure or the consent may be reasonably inferred from the circumstances; or
- we are otherwise permitted to disclose the information under the Privacy Act 1988 (Cth).

The rights of disclosure in this section may, if applicable, be subject to further restrictions contained in data processing agreements with our third party service providers (as applicable).

Disclosure of personal information overseas

We are likely to disclose your personal information overseas. For instance, our related bodies corporate, third party service providers or other recipients may be based overseas or may use infrastructure outside Australia, including the USA, the EEA, Asia and India.

In respect of the Investor Portal, all personal information for the fund registry is stored on Amazon Web Services (AWS) servers in the US West 2 (Oregon) region. Two backup copies are maintained in AWS data centres located in Europe (Ireland) and Australia (Sydney).

We take reasonable steps to ensure information disclosed overseas is handled in accordance with this policy and relevant law, including the Privacy Act.

Internet Use

While we take reasonable steps to maintain secure internet connections, the supply of Personal Information over the internet is at your own risk.

If you follow a link on our Investor Portal to another website, the owner of that website may have its own privacy policy that will apply to its use of your Personal Information processed on that website. We suggest you review that website's privacy policy before you provide access to your Personal Information.

How long we keep Personal Information

We will keep your Personal Information:

- until we no longer have a valid reason for keeping it;
- until you request us to stop using it; or
- for as long as required by law e.g., we keep invoice information for 7 years to fulfil our tax obligations.

We will also take reasonable steps to destroy or de-identify Personal Information once we no longer require it for the purposes for which it was collected or for any secondary purpose permitted under the APPs.

Cookies and tracking

Web analytics

We use web analytic tools, such as Google Analytics, to collect information about use of our Investor Portal and Services, with the goal of improving our Investor Portal and Services. These web analytic tools collect information such as how often users visit the Investor Portal and Services, what pages they visit when they do so, and what other sites they used prior to coming to the site.

We may use various technologies to collect and store information about you when you use the Investor Portal and/or the Services, and this may include using cookies and similar tracking technologies, such as pixels and web beacons, as described below.

Cookies

A cookie is a piece of information that our web server may send to your machine when you visit our Investor Portal. The cookie is stored on your device, but does not identify you or give us any information about your device.

The types of cookies we use may include (but are not limited to):

- **Session Cookies:** These are temporary cookies that are erased when the user closes their web browser. They're used to remember user activity within a single session, making it smoother to navigate the site.
- **Persistent Cookies:** Also known as permanent or stored cookies, they remain on the user's device even after the browser is closed. These cookies can be used to remember a user's login information, preferences, and other persistent information for future visits.
- **First-Party Cookies:** These cookies are set by the website the user is visiting, and they typically allow the website to keep track of the user's activity during their visit.
- **Third-Party Cookies:** These are set by domains other than the one the user is visiting, often by advertising and tracking services. They can be used to track a user's activity across multiple websites and build up a profile of their interests.
- **Secure Cookies:** These cookies can only be transmitted over an encrypted connection (i.e., HTTPS). They help to ensure that the user's information is secure and prevent unauthorized access.
- **HTTP-Only Cookies:** These cookies can't be accessed by client-side scripts, which makes them more secure against potential cross-site scripting (XSS) attacks.

- **SameSite Cookies:** These cookies help prevent Cross-Site Request Forgery (CSRF) attacks by allowing servers to assert that a particular cookie should not be sent along with cross-site requests.

With most internet browsers, you can erase cookies from your computer hard drive, block all cookies, or receive a warning before a cookie is stored. If you want to do this, refer to your browser instructions or help screen to learn more. If you reject the use of cookies, you will still be able to access our Investor Portal but please note that some of its functions may not work as well as they would if cookies were enabled.

Security

We store your personal information in different ways, including in paper and electronic form. The security of your personal information is important to us. We take reasonable measures to ensure your personal information is stored safely to protect it from misuse, loss, unauthorised access, interference, modification or disclosure, including electronic and physical security measures.

Access and correction

You may request access to personal information we hold about you, by making a written request. We will respond to your request within a reasonable period. We may charge you a reasonable fee for processing your request (but not for making a request for access).

We may decline a request for access to personal information in circumstances prescribed by the Privacy Act and if we do, we will provide you with a written notice that sets out the reasons for the refusal (unless it would be unreasonable to provide those reasons).

If, upon receiving access to your personal information, or at any other time, you believe the personal information we hold about you is inaccurate, incomplete or out of date, please notify us immediately. We will take reasonable steps to correct the information so that it is accurate, complete and up to date.

If we refuse to correct your personal information, we will provide you with a written notice that sets out the reasons for our refusal (unless it would be unreasonable to provide those reasons) and provide you with a statement regarding the mechanisms available to you to make a complaint.

Complaints and feedback

If you wish to make a complaint about a breach of the Privacy Act, Australian Privacy Principles or a privacy code that applies to us, please contact us as set out below and we will take reasonable steps to investigate the complaint and respond to you within a reasonable time frame. If we fail to respond to your complaint within a reasonable time period or you are not happy with our response, you may complain directly to the Australian Privacy Commissioner. To lodge a complaint, visit the 'Complaints' section of the Information Commissioner's website, located at <http://www.oaic.gov.au/privacy/privacy-complaints>, to obtain the relevant complaint forms, or contact the Information Commissioner's office.

If you have any questions or concerns about this privacy policy or the way we handle your personal information, please contact us at:

Address: The Rocket, Suite 1402, 203 Robina Town Centre Drive,
Robina QLD 4226
Email: invest@clarencproperty.com.au
Telephone: 1300 156 396

Changes to this Privacy Policy

From time to time, we may make changes to this privacy policy (for example, to reflect any changes in our Services or any applicable privacy laws). Any changes to our policy will be published on our website. Where a change is significant, we'll make sure we let you know – usually by displaying a notice on our Investor Portal or by sending you an email.

More information

For more information about privacy in general, you can visit the Australian Privacy Commissioner's website at www.oaic.gov.au.