

PRIVACY POLICY AND PROCEDURE

Owner	GM – Risk & Compliance
Applicability	SCA Property Group & SURF Funds
Version	5
Version Date	01 July 2016
Next Review Date	June 2018

Introduction

SCA Property Group (**Group**) comprises Shopping Centres Australasia Property Management Trust, Shopping Centres Australasia Property Retail Trust (together, **Trusts**), Shopping Centres Australasia Property Group RE Limited (**Responsible Entity**) and any entities owned and / or managed, either beneficially or legally, by the Trusts or the Responsible Entity, together with any managed investment schemes to which management services are provided by any entity owned by the Group.

Objective

This policy sets out the approach of the Group in complying with the *Privacy Act* (Cth) 1988 (**Privacy Act**), specifically in relation to the collection, maintenance, storage and use of personal information.

SCA Property Group has appointed a Privacy Officer. This person is responsible for implementing the privacy policy and the person to whom any queries or complaints should be referred.

What sort of information does SCA Property Group collect and hold?

SCA Property Group collects personal information in order to carry on its business. SCA Property Group and third parties on its behalf collect personal information. For example:

Who SCA Property Group collects information from	Entity that collects information on behalf of SCA Property Group	Examples of information that may be collected
Tenants Prospective tenants and tenants at its shopping centres and guarantors and officers of those tenants	Property Managers	Name, contact details (eg email and home address and phone numbers), and financial and payment history information.
Investors: Unitholders in its managed investment schemes	Link and SCA Property Group	Name, email and home address, tax file number (TFN), bank account details and, where relevant, details of any complaint.
Workers: Prospective employees and contractors and other people who work for SCA Property Group but are not employees	SCA Property Group and recruiters engaged by SCA Property Group	Name, email and home address, next-of-kin, TFN, bank account details and superannuation fund details.

Personal information collected by SCA Property Group is to be relevant and appropriate for operating SCP's business.

SCA Property Group does not generally collect individuals' sensitive information. In limited circumstances, however, SCA Property Group may collect sensitive information if it is necessary to allow SCP to deal with the individual or the individual's concerns. SCP will obtain the individual's consent to collect their sensitive information.

Why does SCA Property Group collect the information and what if I don't provide it?

Prospective Tenants and Tenants

The primary purpose of collection of personal information from **prospective tenants** is to consider your suitability as a tenant and once accepted to prepare the necessary documentation for you to become a tenant. If you do not provide the required information, SCP will not be able to assess your suitability as a tenant at one of our shopping centres.

The primary purpose of collection of personal information from **tenants** is to administer your lease with SCA Property Group. If you do not provide this information we will not be able to properly administer your lease, for example, acknowledging that your rent has been paid.

Investors

The primary purpose of collection of personal information from **investors** is to comply with laws (particularly the *Corporations Act 2001 (Cth)*) and to assist investors in meeting their taxation requirements, receiving distributions in the most cost effective way for SCA Property Group and to assist SCA Property Group to communicate with investors or dealing with any concerns they may have. If you do not provide the requested information, SCA Property Group will not be able to inform you of important information concerning your investment, pay you the distribution you are entitled to and may need to deduct from your distribution more tax than if you have registered your TFN with Link.

Workers

The primary purpose of collection of personal information from **potential employees and contractors** is to assess the suitability of applicants for the role offered and in the case of contractors who are individuals, establishing records and systems to enable SCA Property Group to pay you and review your performance. If you do not provide the requested information, SCA Property Group will not be able to assess your suitability for any offered role within SCA Property Group. For contractors who are individuals, if you do not provide the requested information, SCA Property Group may not be able to pay you or may have to deduct greater amounts than would otherwise be necessary.

How information is collected?

Where practical and reasonable, SCA Property Group will collect personal information directly from the individual concerned. SCA Property Group may collect information in particular circumstances from an individual's agent or from governmental sources. SCA Property Group will take reasonable steps to inform the individual that it has the individual's personal information unless it is obvious from the circumstances. Personal information is generally collected:

- in respect of **tenants**: directly from the tenant or prospective tenant through a tenant application or an "intention to lease" (ITL) document or similar;
- in respect of **investors**: directly from the investor by the relevant investor updating their information on-line, on paper sent to Link or over the phone directly with Link. If an investor complains to SCP, directly from the person who brings their concerns to SCP's attention; and
- in respect of **workers**: directly from the prospective employee or individual contractor or where the employee comes through a recruiter, from the information provided by the recruiter.

Unsolicited information

Where SCA Property Group receives unsolicited information, for example an individual who wishes to become an employee or a tenant, SCP will treat the information as if it had collected it directly from the individual.

If SCA Property Group receives information it could not lawfully collect itself, it will destroy that information where lawful and reasonable to do so.

Why does SCP collect, hold and use your personal information?

Where SCA Property Group collects information from tenants and prospective tenants the information used and collected is only for the purposes of the particular transaction and any other potential leasing opportunity SCP considers may be of interest to that tenant or prospective tenant. In respect of tenants the information may be used within SCA Property Group for example collecting rent, monitoring receivables, our financial reporting and valuation of our properties.

Where SCA Property Group collects information from investors, the information used and collected is for the purposes of complying with our obligations under various laws and regulations (including the *Corporations Act 2001 (Cth)* and its related regulations), to assist SCA Property Group in understanding our investors and their needs and to communicate with investors, including direct marketing communications as set out below. If an investor raises a concern with SCA Property Group, the information used and collected to assist SCP in improving its services and to monitor whether you are satisfied with the third party service providers SCA Property Group are using. By collecting this information, SCP complies with its obligations under its Constitutions, ASIC's regulatory guides and various laws (including the *Corporations Act 2001 (Cth)*), for our internal compliance reporting requirements.

SCA Property Group collects personal information from individuals who submit applications or register interest for employment with SCP. If the application is unsuccessful, SCA Property Group may retain the information in case a more appropriate opportunity becomes available. Applicants may request SCA Property Group not retain this information.

SCA Property Group may be required to hold this information for at least 7 years. Where SCA Property Group is no longer required to keep the personal information or no longer needs it, it will take reasonable steps to destroy the personal information or de-identify it.

Direct marketing communications and opting out

Investors

SCA Property Group may send its investors direct marketing communications and information about products and services that it considers may be of interest to its investors. This may include information about products and services that are provided by other related parties and entities within the SCA Property Group.

These communications may be sent in various forms, including by telephone, post, fax, email, SMS or by other forms of electronic messages.

Each investor of SCA Property Group consents to being sent these direct marketing communications by any of those methods. If an investor indicates a preference for a method of communication, SCA Property Group will try to use that method whenever practical to do so.

An investor may opt-out of receiving marketing communications from SCA Property Group at any time by using any of the opt-out facilities provided in the marketing communications or as set out below.

Tenants

SCA Property Group may from time to time send its tenants general marketing material.

To whom is personal information disclosed?

SCA Property Group does not provide your personal information to third parties other than as stated below. SCA Property Group has taken steps to ensure that these third parties comply with the *Privacy Act 1988* and SCA Property Group's privacy policy. Personal Information may also be disclosed to other members of SCA Property Group. SCA Property Group does not intend to disclose personal information to overseas recipients.

From time to time, SCA Property Group may undertake a marketing campaign in one of its Shopping Centres and may provide information about tenants in the Shopping Centre to an entity assisting it with that campaign to the extent such information is relevant to the campaign.

Parties to whom SCA Property Group may disclose relevant personal information include:

- consultants and advisers (including but not limited to solicitors) and agents (including but not limited to real estate agents and debt collection services and for workers, travel agents) or contractors acting on SCA Property Group's behalf;
- valuers where SCA Property Group is seeking to revalue a property or lease and to its financiers;
- the Australian Securities Exchange, the Land and Property Information Services in each state and territory of Australia, Australian Securities and Investment Commission and other regulatory authorities where required by law;
- related parties and entities of the SCA Property Group; and
- parties to whom SCA Property Group has outsourced various functions e.g. registry services, property management services, lease management etc.

Maintenance of the quality of information

SCA Property Group will take reasonable steps to ensure that the personal information it collects and uses is accurate, complete and up to date. Wherever possible, it will ask the individual who provided the information previously to confirm it is up to date.

SCA Property Group will let individuals see information held about them and correct the errors or omissions. Where an individual (such as a tenant or an investor) wishes to review information held about them by SCA Property Group, they should contact the SCA Property Group Privacy Officer.

It is SCA Property Group's policy from time to time to delete or de-identify information about you when it is no longer needed or no longer a legal requirement for the information to be kept.

Access to personal information held by SCA Property Group

If an individual wishes to view what personal information SCP holds about them or to correct that information, they should contact SCP's Privacy Officer. You will need to specify the personal information to which you are seeking access. If a third party holds the information for SCP, you will need to contact that third party directly and comply with their procedures.

To ensure the integrity and safety of the personal information, SCA Property Group will only disclose personal information if its internal procedures are satisfied. Depending on the nature of the request SCP may ask you to put your request in writing, provide photo identification and sign an enquiry form, which will be sent to you.

To contact the Privacy Officer you should either:

Email: privacy.officer@scaproperty.com.au

Write to **Privacy Officer:**
Level 5, 50 Pitt Street
SYDNEY NSW 2000

Complaints regarding your personal information

Any complaint received by SCA Property Group in connection with personal information SCP has collected, used or disclosed will be dealt with in the following manner:

First response: All complaints (either in writing, by email or verbal) must be referred to the Privacy Officer who will arrange for a written acknowledgement to be sent to the complainant generally within 24 and no longer than 48 hours.

Investigation: The Privacy Officer will investigate whether there has been an interference with the privacy of the individual. If the complaint relates to the service of an external service provider the Privacy Officer will work with that provider to investigate the complaint in accordance with the provider's complaints handling procedure.

Final Response: The Privacy Officer must report the findings of their investigation and provide an appropriate full response to the complainant within 45 days of receipt of the original complaint. If this not be possible within 45 days of receipt of the complaint, the complainant must be advised as to the progress made and the timetable for a complete response. The final response should also tell the complainant that if they are not satisfied with SCP's response, they may complain to the Financial Ombudsman Service (**FOS**). FOS is an external complaint resolution scheme of which both SCPRE (Member No. 31285) and SURF RE (Member No. 35982) are members and may be contacted at:

Financial Ombudsman Service Limited
GPO Box 3
Melbourne Victoria 3001
Toll Free 1300 780 808
Fax (03) 9613 6399
Email info@fos.org.au or visit website at www.fos.org.au

The Privacy Officer will be the person from SCA Property Group primarily responsible for dealing with FOS.

An additional resource is the Office of the Australian Information Commissioner (the **OAIC**):

Post	Email	Fax
Director of Compliance (Investigations) GPO Box 5218 Sydney NSW 2001	enquiries@oaic.gov.au	+61 2 9284 9666

The Privacy Officer will be the person from SCA Property Group primarily responsible for dealing with the OAIC.

Opting Out

Investors and tenants can opt out from receiving direct marketing communications. In order to opt-out, please contact the SCA Property Group Privacy Officer by emailing privacy.officer@scaproperty.com.au.

For investors, even if you opt-out of receiving direct marketing communications, SCA Property Group will still need to send you essential information about your account, your investment in SCA Property Group and other information required by law.

Complaints and access to personal information held by third parties on behalf of SCA Property Group

Investors in SCP

SCA Property Group has outsourced its registry function to Link Market Services Limited (**Link**). Link has developed a privacy policy dealing with the information it collects on SCA Property Group's behalf. To obtain a copy of Link's privacy policy or to opt out, contact:

Email: privacy.officer@linkmarketservices.com.au

Write to: **Privacy Officer**
Link Market Services Limited
Locked Bag A14
Sydney South NSW 1235

You should contact the Link Privacy Officer if you as an investor:

- have a complaint about privacy; or
- would like details of your personal information held by Link on behalf of SCA Property Group; or
- would like to correct your personal information held by Link on behalf of SCA Property Group.

For your protection, Link may only disclose personal information if its internal procedures are satisfied. If you are not satisfied by Link's response to your privacy concerns you should contact the SCA Property Group Privacy Officer.

If your holding is sponsored by a broker, however, Link will not be able to update your personal information. You will need to contact your broker to do this.

Investors in funds managed by SURF RE

SURF RE has outsourced its registry function to Board Room Registry Services (**BoardRoom**). BoardRoom has developed a privacy policy dealing with the information it collects on SURF RE's behalf. To obtain a copy of BoardRoom's privacy policy or to opt out, contact:

Email: privacyofficer@boardroom.com.au

Write to: **The Privacy Officer**
Board Room Pty Limited
GPO Box 3993
Sydney NSW 2001

You should contact the BoardRoom Privacy Officer if you as an investor:

- have a complaint about privacy; or
- would like details of your personal information held by BoardRoom on behalf of SURF RE; or
- would like to correct your personal information held by BoardRoom on behalf of SURF RE.

For your protection, BoardRoom may only disclose personal information if its internal procedures are satisfied. If you are not satisfied by BoardRoom's response to your privacy concerns you should contact the SCA Property Group Privacy Officer.

Prospective Tenants and Tenants

SCA Property Group has outsourced aspects of its property management to the following organisations (**Property Managers**) in:

- Western Australia, regional New South Wales and North Queensland to Knight Frank (**KF**);
- South Queensland to Race Property (**Race**);
- Eastern Victoria to Comac Property Group (**Comac**);
- Tasmania to Knight Frank (**KFT**); and
- Coastal NSW, Western/ Northern Victoria, South Australia & New Zealand to Colliers (**Colliers**).

You should contact the Privacy Officer of the relevant Property Manager if you are a prospective tenant or tenant and:

- have a complaint about privacy; or
- would like details of your personal information, which that Property Manager holds on behalf of SCA Property Group; or
- would like to correct your personal information held by the relevant Property Manager on behalf of SCA Property Group.

For your protection, the Property Manager may only disclose personal information if their internal procedures are satisfied. If you are not satisfied by the relevant Property Manager's response to your privacy concerns you should contact the SCA Property Group Privacy Officer.

Knight Frank

KF have developed a privacy policy dealing with the information they collect on SCA Property Group's behalf. To obtain a copy of their privacy policy or to opt out, contact:

Email	Aaron.McGhee@au.knightfrank.com
Write to:	Managing Director – Asset Management Level 22, 123 Pitt Street Sydney NSW 2000

Knight Frank

KF have developed a privacy policy dealing with the information they collect on SCA Property Group's behalf. To obtain a copy of their privacy policy or to opt out, contact:

Email	kft@knightfranktasmania.com.au
Write to:	Privacy Officer Knight Frank Tasmania 5 Victoria Street Hobart TAS 7000

Colliers

Colliers have developed a privacy policy dealing with the information they collect on SCA Property Group's behalf. To obtain a copy of their privacy policy or to opt out, contact:

Email	Dale.McDermid@colliers.com
Write to:	National Director – Retail Property Level 8, 20 Smith Street, Parramatta NSW 2150

Race Property

Race Property have developed a privacy policy dealing with the information they collect on SCA Property Group's behalf. To obtain a copy of their privacy policy or to opt out, contact:

Email meagan@raceproperty.com.au

Write to: Meagan Wakefield
Director
Unit 19, 10 Depot Street
Banyo QLD 4014

Comac

Comac have developed a privacy policy dealing with the information they collect on SCA Property Group's behalf. To obtain a copy of their privacy policy or to opt out, contact:

Email michaelh@comac.com.au

Write to: Michael Haddrick
Level 1, 169 Moray Street
South Melbourne VIC 3205

Security of information

SCA Property Group takes all reasonable security measures to protect personal information from loss, unauthorised access, destruction, misuse, modification, interception or disclosure.

No SCP worker is able to access information they do not require for the proper performance of their duties. There are passwords and security access IDs in place to restrict access of confidential and personal information about individuals to those that need it in the carrying on of their positions. SCA Property Group does not sell personal information to companies outside SCA Property Group.

Visiting our web-site

When you visit the website under the domain name www.scaproperty.com.au (**SCP's website**), SCA Property Group collects certain anonymous information arising out of your visit. That information includes the date and time of your visit, how long you spent on SCP's website and the pages that were viewed during the course of your visit. It also includes some technical details about the computer and web browser being used to visit SCP's website (specifically, the user-agent and IP address sent by your web browser).

None of this information allows SCP to personally identify you or your email address. SCA Property Group use this information in aggregated form to help us understand patterns of use of this website to measure the effectiveness of this website and produce statistical usage reports.

SCP's website currently uses (first party) "cookies". Cookies are a type of file that websites may transfer to your hard drive to allow the website to identify your computer in the future. Cookies do not enable you to be identified as an individual. These cookies are used to maintain the session between your web browser and the server during your visit.

SCA Property Group's website will not ask you for, or capture, any of your personal information.