



PRIVACY POLICY

Owner	GM – Risk & Compliance
Applicability	SCA Property Group & SURF Funds
Version	6
Version Date	June 2018
Next Review Date	June 2020

Introduction

SCA Property Group (**Group**) comprises Shopping Centres Australasia Property Management Trust ARSN 160 612 626, Shopping Centres Australasia Property Retail Trust ARSN 160 612 788 (together, **Trusts**), Shopping Centres Australasia Property Group RE Limited ABN 47 158 809 851 (**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 its legal requirements in respect of the collection, maintenance, storage and use of your personal information¹, including requirements under the *Privacy Act 1988* (Cth) (**Privacy Act**).

This policy may be updated from time to time, and so we encourage you to regularly check our website.

The 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 the Group collect and hold?

The Group, and third parties on its behalf, collect personal information in order to enable the Group to carry on its business. Examples of the types of personal information that may be collected by, or on behalf of, the Group are as follows:

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 e.g. Knight Frank, Colliers, Comac, Race	Name, contact details (e.g. email and home address and phone numbers), and financial and payment history information.
Investors: Unitholders in its managed investment schemes	Link, Boardroom 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, background checks and superannuation fund details.

The Group only collects personal information that is relevant and appropriate for the operation of the Group's business.

The Group does not generally collect individuals' sensitive information. In limited circumstances, however, the Group may collect sensitive information if it is necessary to allow it to deal with the

¹ Personal information is defined as information or an opinion that can identify or can reasonably identify an individual

individual or the individual's concerns. The Group will obtain the individual's consent prior to collecting their sensitive information.

Why does the 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, the Group 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 the Group. The information may be used within the Group, for example for the purposes of collecting rent, monitoring receivables, our financial reporting and valuation of our properties. 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.

Where the 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 the Group considers may be of interest to that tenant or prospective tenant.

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. We also collect personal information for the purpose of making distributions in the most cost effective way and to assist the Group to communicate with investors (including direct marketing communications as set out below) or deal with any concerns they may have. If you do not provide the requested information, the Group will not be able to inform you of important information concerning your investment or pay you the distribution you are entitled to. We may also need to deduct from your distribution more tax than we otherwise would if you had registered your TFN with Link.

By collecting this information, SCP complies with its obligations under its Constitutions, ASIC's regulatory guides and various laws, for our internal compliance reporting requirements.

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 the Group to pay you and review your performance. If you do not provide the requested information, the Group will not be able to assess your suitability for any offered role within the Group. For contractors who are individuals, if you do not provide the requested information, the Group may not be able to pay you or may have to deduct greater amounts than would otherwise be necessary for tax purposes.

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.

Generally

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.

How information is collected?

Where practical and reasonable, the Group will collect personal information directly from the individual concerned. The Group may collect information in particular circumstances from an individual's agent

or from governmental sources. The Group will take reasonable steps to inform the individual that it has collected the individual's personal information from a third party, 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 [or whether an?] investor makes a complaint to the Group. We also collect personal information from Link where the investor updates their information by sending a hardcopy form to Link or over the phone with Link. ; and
- in respect of **workers**: directly from the prospective employee or individual contractor, including where individuals submit applications or register interest for employment with the Group, or, where the employee comes through a recruiter, from the recruiter.

Unsolicited information

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

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

Direct marketing communications

Investors

The 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 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 the 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, the Group will try to use that method whenever practical to do so.

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

Tenants

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

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

Opting Out

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

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

To whom is personal information disclosed?

The Group does not provide your personal information to third parties, except as stated below. The Group has taken steps to ensure that these third parties comply with the *Privacy Act 1988* and this privacy policy. Personal information may also be disclosed to other members of the Group.

From time to time, the 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 the Group may disclose relevant personal information include:

- our employees and related bodies corporate;
- third party suppliers and service providers;
- specific third parties authorised by you to receive information held by us;
- 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 the Group's behalf;
- valuers, where the 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; and
- parties to whom the Group has outsourced various functions e.g. IT services, registry services, property management services, facilities management services] etc.

Maintenance of the quality of information

The Group takes 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.

The 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 Privacy Officer.

The Group may from time to time 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 and correction of personal information held by the Group

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

To ensure the integrity and safety of the personal information, the Group will only disclose personal information if its internal procedures are satisfied. Depending on the nature of the request, the Group 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

An individual can make a complaint about the way in which the Group has handled an individual's personal information by writing to the Group's Privacy Officer. SCA will endeavour to act promptly in response to a complaint.

You may also contact the Office of the Australian Information Commissioner as follows: Phone 1300 363 992 Web www.oaic.gov.au Address GPO Box 5218 Sydney, NSW 2001.

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

Investors in the Group

The 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 the Group's behalf. To obtain a copy of Link's privacy policy

Email: privacy.officer@linkgroup.com

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 the Group; or
- would like to correct your personal information held by Link on behalf of the 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 Group's Privacy Officer.

If your holding is sponsored by a broker, you will need to contact your broker to update your personal information.

Investors in funds managed by SURF RE

SURF RE has outsourced its registry function to Boardroom 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 contact:

Email: privacyofficer@boardroomlimited.com.au

Write to: **The Privacy Officer**
Boardroom 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 Group's Privacy Officer.

Prospective Tenants and Tenants

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

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

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

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

Knight Frank

KF have developed a privacy policy dealing with the information they collect on the 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 the 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 the 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

