



HOTEL PROPERTY INVESTMENTS LIMITED [ACN: 010 330 515]

# PRIVACY POLICY

ACN: 010 330 515

**VERSION 2**

May 2018

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## **1.0: POLICY**

Hotel Property Investments Limited (the **Company**) is committed to complying with all privacy laws and principles, including the principles contained in the Privacy Act 1988 (Cth) as in force from time to time, and to protecting personal and sensitive information from unfair and unauthorised use. We are also committed to ensuring that our employees are aware of their obligations in relation to the protection of personal and sensitive information.

## **2.0: PURPOSE & OBJECTIVE**

This policy describes:

- why the Company needs personal information and what types we collect
- how collect and protect your personal information
- the purpose for which we collect and use you personal information how you can request access to your personal information
- how you can contact us to find out more about your personal information
- what to do if you have concerns about your privacy.

## **3.0: WHY WE COLLECT PERSONAL INFORMATION**

### **3.1: Who do we collect personal information from?**

In the course of providing our products and services the Company may collect personal information from customers or potential customers, investors or potential investors and staff.

### **3.2: What types of personal information do we collect?**

We collect current and historical personal information including information about your name, contact details, identification, organisation, employment, positions held, forms submitted, payment details and enquiry/complaint details. We also collect personal information about your dealings with us, including from records of any contact we have with you by telephone, email or online.

If you are a securityholder, we also collect investment details. We collect some personal information under laws including the Income Tax Assessment Act and the Corporations Act.

If you apply for a position with us, we also collect information about your qualifications, skills, experience, character and screening checks (including health, reference, background, directorship, financial probity, identity, eligibility to work, vocational suitability and criminal record checks). In addition, if you join our staff, we collect information relating to your current or former employment or engagement including information about your training, disciplining, resignation, termination, terms and conditions, staff benefits, emergency contact details, performance, conduct, use of our IT resources, payroll matters, union or professional/trade association membership, recreation, drug/alcohol tests, leave and taxation, banking or superannuation affairs. We collect some of this personal information under laws including the Fair Work Act, Superannuation Guarantee (Administration) Act and Income Tax Assessment Act.

### **3.3: How do we collect and hold your personal information?**

We collect personal information you provide to us directly. In some circumstances we also collect personal information through other means including publicly available sources, our related companies and your organisation, colleagues and representatives.

HPI does not collect information about users of its website but our website may contain links to other websites. We do not share your personal information with those websites and we are not responsible for their privacy practices. Please check their privacy policies.

Sometimes we may be provided with your personal information without having sought it through our normal means of collection. We refer to this as “unsolicited information”. Where we collect unsolicited information we will only hold, use and or disclose that information if we could otherwise do so had we collected it by normal means. If that unsolicited information could not have been collected by normal means then we will destroy or de-identify the information as appropriate provided it is lawful to do so.

Personal information that we collect is held in different formats, including in hard copy and electronically.

### **3.4: The purposes for which your personal information is collected**

We collect, hold, use and disclose personal information to operate our business. This includes:

- managing our property investment portfolio
- facilitating investments in Hotel property Investments
- maintaining and updating our records
- communicating and managing our relationships with stakeholders including our staff and business
- contacts representing investors, tenants, property agents and others
- recruiting, training and managing staff
- protecting our lawful interests
- facilitating acquisitions and potential acquisitions of our business.

We may not be able to do these things without your personal information. For example, we may not be able to communicate with you or consider your application for employment.

### **3.5: How we use your personal information?**

We may exchange your personal information with our related bodies corporate, your organisation colleagues and representatives and with our service providers including providers of real estate, property management, data storage, auditing, accounting, legal, business consulting, debt collection, delivery, data processing, data analysis, document management, information broking, research, investigation, insurance, website and technology services.

If you are a securityholder please note that we use Link Market Services Limited to assist with registry and investor relations services. Link Market Services Limited’s privacy policy is available via the following link <http://www.linkmarketservices.com.au/corporate/Privacy.html>.

If you apply for a position with us, we may exchange your personal information with academic institutions, recruiters, screening check providers, health service providers, professional and trade associations, law enforcement agencies, referees and your current and previous employers. In addition, if you join our staff, we may exchange your personal information with your representatives (including unions), other employers seeking a reference about you and our service providers including providers of payroll, superannuation, banking, staff benefits, surveillance and training services.

### **3.6: Storage and security of your personal information**

We implement a range of measures to protect the security of personal information, including – depending on the circumstances – electronic access controls, premises security and network firewalls. We hold personal information electronically and in hard copy form, both at our own

premises and with the assistance of our service providers. In the event a person ceases to be an investor, employee or similar of Hotel Property Investments, any personal information we hold will be maintained on site or in a secure offsite storage facility for up to seven years in order to comply with legislative and professional requirements.

### **3.7: When we disclose your personal information**

We only use personal information for the purposes for which it was given to us, or for purposes which are directly related to one or more of our functions or activities. We may disclose your personal information to government agencies from time to time, only if one or more of the following apply:

- you have consented;
- you would reasonably expect us to use or disclose your personal information in this way;
- we are authorised or required to do so by law;
- disclosure will lessen or prevent a serious threat to the life, health or safety of an individual or to public safety;
- where another permitted general situation applies;
- disclosure is reasonably necessary for a law enforcement related activity.

### **3.8: Your privacy rights**

You can contact us if you wish to access or correct any personal information we may hold about you. We will respond within a reasonable time and may need to verify your identity.

Please provide as much detail as you can about the particular information you seek, in order to help us locate it. We will provide our reasons if we deny any request for access to or correction of personal information. Where we refuse to make a requested correction, you can ask us to make a note of your requested correction with the information.

We will not provide access to personal information which would reveal any confidential formulae or details of any in-house evaluative decision making process, but may (in our sole discretion) instead provide the result of the formulae or process or an explanation of that result.

You can contact us if you have any concerns about how we have handled your personal information. We may request additional details from you regarding your concerns, and may need to engage or consult with other parties in order to investigate and deal with your issue. We will keep records of your request and any resolution.

### **3.09: Sensitive Information**

Sensitive information includes a person's race or ethnic origin, political opinions, religious beliefs, membership of a trade or professional association, sexual preferences, health records, government identifiers (such as your TFN), your nationality, country of birth, family court orders and criminal records.

It is not our normal practice for us to collect sensitive information and we would only collect sensitive information if we have the consent of the individuals to whom the sensitive information relates, or if the collection is necessary to lessen or prevent a serious threat to life, health or safety or another permitted general situation.

### **3.10: Anonymity and Using a Pseudonym**

You have the option of dealing with us anonymously or by using a pseudonym if it is lawful and practical to do so. In some cases however, we will generally require your contact details if you would like us to transact with you, or if you would like us to respond to your request to provide you with some product, service or information that you are seeking.

## 4.0: Privacy Complaints

You can contact us about this Privacy Policy or about your personal information by:

- Emailing: [privacy@hpitrust.com.au](mailto:privacy@hpitrust.com.au)
- Calling: (03) 9038 1774
- Writing:  
'Privacy Officer', Suite 2, Level 17  
IBM Centre, 60 City Road  
Southbank, Vic 3006

If practical, you can contact us anonymously (i.e. without identifying yourself) or by using a pseudonym. However, if you choose not to identify yourself, we may not be able to give you the information or provide the assistance you might otherwise receive if it is not practical to do so.

## 5.0: FURTHER INFORMATION

This Privacy Policy is subject to change at any time. Please check our Privacy Policy on our website (<http://www.hpitrust.com.au/>) regularly for any change.