

HOTEL PROPERTY INVESTMENTS LIMITED [ACN: 010 330 515]

PRIVACY POLICY

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HOTEL
PROPERTY
INVESTMENTS

VERSION 4

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1.0: POLICY

Hotel Property Investments Limited (the **Company** or **HPI**) is committed to complying with all privacy laws and principles, including the Australian Privacy Principles (**APPs**) contained in the Privacy Act 1988 (Cth) (**Privacy Act**) 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 we collect and protect your personal information;
- the purpose for which we collect and use your personal information;
- how you can request access to your personal information;
- how you can contact us to find out more about your personal information; and
- what to do if you have concerns about your privacy.

You consent to us collecting, holding, using and disclosing your personal information in accordance with this policy.

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, date of birth, contact details such as your address, telephone number and email address, identity information from documents you offer as proof of your identity (for example, driver's licence details or passport), organisation, employment, positions held, forms submitted, payment details, including tax file numbers, 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 1997 (Cth) and the Corporations Act 2001 (Cth).

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 and superannuation affairs. We collect some of this personal information under laws including the Fair Work Act 2009 (Cth), Superannuation Guarantee (Administration) Act 1992 (Cth) and Income Tax Assessment Act 1997 (Cth).

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 HPI;
- maintaining and updating our records;
- communicating and managing our relationships with stakeholders including our staff and business;
- contacting investors, tenants, property agents and other representatives;
- recruiting, training and managing staff;
- protecting our lawful interests; and
- 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 provide you with our services, communicate with you or consider your application for employment.

3.5: Who do we disclose your personal information to, and why?

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: https://www.linkgroup.com/docs/Link_Group_Privacy_Policy.pdf.

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.

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; or
- disclosure is reasonably necessary for a law enforcement related activity.

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 HPI, 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.

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.

3.7: Overseas disclosures

We do not disclose your personal information to recipients which are located outside Australia.

3.9: 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.

We will not charge a fee for making a request to access the personal information we hold about you or for making any corrections to personal information. However, in certain circumstances we may require you to meet our reasonable costs in providing you with access to your personal information, for example, if the information requested is voluminous or we incur third party costs in providing you access to your personal information.

3.10: Sensitive Information

HPI will not collect sensitive information unless the person to whom it relates consents to the collection and the information is reasonably necessary for one or more of HPI's functions or activities, except where the collection is required or authorised by law, is necessary to prevent or lessen a serious and imminent threat to the person's (or another person's) life or health or is necessary in relation to legal proceedings (current, anticipated or potential), or another permitted exception in the Privacy Act applies.

3.11: 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. 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

If you have a complaint about the way in which we have handled any privacy issue, including your request for access or correction of your personal information, you should contact us. You can contact us about this Privacy Policy or about your personal information by:

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

We will consider your complaint and determine whether it requires further investigation. We will notify you of the outcome of this investigation and any subsequent internal investigation.

If you remain unsatisfied with the way in which we have handled a privacy issue, you may approach an independent advisor or contact the Office of the Australian Information Commissioner (www.oaic.gov.au) for guidance on alternative courses of action which may be available.

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.

6.0: REVIEW

The Board will review this policy from time to time to assess that it is operating effectively and to consider whether any changes are required.