

Privacy Policy

Introduction

1. This is the official privacy policy ('policy') of the Resimax Group businesses listed: Resimax Group Holdings Pty Ltd (ACN 143 064 386), Resimax Group Pty Ltd (ACN 164 428 942), Resimax Property Management Pty Ltd (ACN 604 536 807) as trustee for the Resimax Property Management Unit Trust (trading as "Leap Real Estate") Tick Homes Pty Ltd (ACN 620 818 180), RESIMAX GROUP MALAYSIA SDN BHD (formerly known as Resimax Malaysia Sdn Bhd) (Company No. 20150102770) including brands such as Resimax Group Investor (RGI) (collectively, **Resimax Group, 'we, 'our'** or **'us'**). This policy applies to all information collected by Resimax Group about an individual or that is reasonably capable of identifying an individual ("**personal information**"). In this policy we explain how and why we collect your personal information, how we use it, and what controls you have over our use of it. By providing your personal information to us you consent to the collection, processing and use of your personal information as described in this Privacy Policy.

2. Resimax Group is committed to complying with legislation governing corporation's handling of personal information including the Privacy Act 1988 (Cth) **(Privacy Act**) (incorporating the Australian Privacy Principles) and any applicable privacy codes registered under the Privacy Act.

3. We note that this policy does not apply to information that has been anonymised, aggregated or otherwise de-identified provided that no person is reasonably identifiable from such data. We use and disclose de-identified information for marketing, advertising, research, compliance and other purposes.

Collection of personal information

4. Some information provided to us by clients, customers, contractors and other third parties might be considered private or personal. While you are not under any obligation to provide personal information to us, without certain personal information we may not be able to provide our products or services to you, respond to your enquiries or process your requests, allow you to participate in promotions or competitions operated by us or obtain the product or service you are offering.

5. The types of personal information we collect will vary depending on the reason we are collecting the personal information. We take steps to ensure that we only collect personal information if it is necessary for one or more functions or activities of the Resimax Group businesses. The types of personal information we may collect and hold includes (amongst other things) names, addresses, identification information, phone numbers and email addresses, age / date of birth, payment card details, bank account details, employment status and other information contained in forms you provide to us. We also collect your website preferences as well as other electronic information related to your use of our website (as further described below).

6. For example, Resimax Group may collect and hold your personal information in the following circumstances:

a. if you contact, interact or correspond with Resimax Group (including in person, online and via telephone/WhatsApp/SMS or email);



b. when you submit personal information to us via the internet including our social media pages and our websites, such as providing your e-mail address for inclusion on our website mailing list;

c. if you attend one of our property investment or other educational seminars (in these circumstances we may obtain your personal information to request your feedback);

d. when you submit information to us as part of a tenancy or purchase application;

e. if you are a tenant in, or the owner of, a property managed by Resimax Group;

f. when you submit personal information as part of any promotion or competition operated by Resimax Group; and/or

g. if we are obligated to collect certain types of personal information by law.

7. The types of individuals we collect personal information from include customers, clients, investors, property owners, tenancy applicants, tenants, service providers, shareholders, job applicants, employees, contractors and other persons who correspond with Resimax Group.

8. In some circumstances we may also collect personal information about an individual indirectly such as from third party or public sources if it is impractical to collect the personal information directly from the individual. For example, we may obtain a reference for your tenancy application from a third party. At or before the time personal information is collected by us we will take reasonable steps to ensure that you are made aware of who we are, your rights to access the personal information held about you, the purposes of the collection, the types of organisations to which we usually disclose the information collected about you, any laws requiring the collection and the main consequences for you if all or part of the personal information is not collected.

Use of personal information collected and disclosure of personal information to others

9. We may use and disclose personal information we hold about you for the purpose that it was collected, for related secondary purposes you would reasonably expect, for other purposes you consent to and for other purposes that are authorised by law. Such use and disclosure is generally (but not exclusively) for purposes related to the provision, promotion, management, administration and improvement of our products and services, including (but not limited to) assessing a tenancy application, notifying property owners, tenants and other customers about changes to our products or services, communicating with property owners, tenants, customers and other persons who contact us, verifying transactions, dealing with complaints and enquiries, complying with our legal and regulatory obligations or protecting our lawful interests.

10. We may also use your personal information to contact you on an ongoing basis about products or services that we think may be of interest to you unless you opt out or we are otherwise prevented by law. You may elect not to receive further marketing communications by notifying us using the contact details below or by following the opt-out instructions provided in the communication (such as an unsubscribe link in an email).

11. Your personal information may be disclosed to persons outside Resimax Group in the circumstances set out in this policy or as otherwise notified to you at the time of collection. By providing us with personal information you consent to the disclosure of personal information collected by us to:

a. other entities within the Resimax Group, including companies operating in countries outside Australia;



b. joint venture and other trusted alliance partners;

c. our third-party service providers including IT service providers, data analytics providers, advertising and marketing service providers, out-sourced call centres, mail houses and third party fulfilment contractors; and

d. our professional advisors including our accountants, auditors and lawyers;

e. courts, tribunals, regulatory bodies, government agencies, insurers, and law enforcement bodies as required or authorised by law; and

f. any person authorised by you from time to time.

12. Some of these parties such as our partners and service providers may be located in, or provide services from, another country and you consent to the transfer of your personal information outside your country of residence. You acknowledge that these countries may not have the same data protection laws as the country in which you provided the information and may not provide the same rights or level of protection. Currently, Resimax Group predominately discloses personal information to recipients located in Australia, the United States of America, Malaysia and Singapore.

13. Resimax Group may also disclose personal information in connection with a merger or sale involving all or part of the Resimax Group businesses or as part of a corporate reorganisation or share sale or other change in corporate control.

14. If you apply for an employment or contractor position with Resimax Group, we will use and disclose your personal information for purposes related to assessing your suitability for that position and for other positions that may arise in the future. This policy does not cover our handling of current Resimax Group employee personal information. Current employees of Resimax Group can contact their HR representative or supervisor for more details about how we handle employee personal information.

Sensitive information

15. Some types of personal information are classified as 'sensitive information' under the Privacy Act, including information about racial or ethnic origin, religious affiliation, political or trade unions membership, sexual preference, criminal record and health information. Sensitive information is subject to greater restrictions under the Privacy Act. Resimax Group does not generally collect, use or disclose sensitive information. However, in some circumstances, sensitive information may be collected by Resimax Group if the relevant individual consents to such collection. For example, we may seek health information from prospective employees and we may not be able to adequately assess a candidate's suitability for an employment position if they elect not to provide this information. The way we use and disclose tax file numbers is also governed by law.

Website links

16. Our websites may contain links to other websites and those third-party websites may collect personal information about you. Resimax Group is not responsible for the privacy practices of other businesses or third party websites that are linked to our websites. Resimax Group encourages users to be aware when they access a link to a third party website and to read the privacy statements of each and every third party website that collects personal information.



Security and Storage

17. Resimax Group has security measures in place designed to protect personal information under our control against loss, misuse, unauthorised access, destruction, modification, alteration or disclosure. We also take steps to ensure personal information we hold is de-identified or destroyed securely when no longer required for any permitted purpose.

18. No data transmission over the internet can be guaranteed to be 100% secure. As a result, while we strive to protect user's personal information, Resimax Group cannot ensure or warrant the security of any personal information transmitted to it or from its online products or services, and users do so at their own risk. Once Resimax Group receives your data, it takes all reasonable steps to secure the data on our or our service providers' systems.

19. You acknowledge that you are responsible for keeping your passwords and account information secret. Please contact us immediately if you think the security of your account may be compromised. Please be careful and responsible whenever you are online.

Access to and correction of personal information

20. Resimax Group is committed to maintaining accurate, complete, timely, relevant and appropriate personal information about our customers, clients, website users and other persons in accordance with this policy. Please update your details online or otherwise contact us if your contact or other information changes.

21. You may request access to, or the correction of, personal information we hold about you by contacting us using the contact details set out below. We may need to first verify your identity. In most cases, we will be able to comply with your request within a reasonable period of time. In some circumstances, we are permitted by law to decline your access or correction request. If we do decline, we will provide the reason(s) for doing so. You can ask us to make a note of any declined request with the relevant information.

22. While there is no fee for requesting access to, or correction of, your personal information, Resimax Group may charge a reasonable fee to cover the administrative and postage costs incurred by us in processing an access request.

Complaints

23. If you have a comment or complaint about this policy or our handling of your personal information, please contact us using the contact details set out below.

24. We will promptly contact you to confirm we have received your complaint and then take steps to resolve it. If you are not satisfied with the outcome of this process you can contact the Office of the Australian Information Commissioner.

Website collection

25. Resimax Group automatically collects certain information from its website using technologies such as cookies, tags, web beacons and navigational data collection.



26. When you visit the Resimax Group website, our system will, for example, record/log your IP address (the address which identifies your computer on the internet and which is automatically recognised by our web server), the date and time of your visit to our site, the pages viewed, and any information downloaded or submitted. This information will be used for the purpose of website analysis and to help us offer you improved products and services.

27. Resimax Group automatically collects non-personal information about your visit to our websites such as the type of device or internet browser you use or the site from which you linked to our website.

28. We use cookies to monitor usage of our website to create a personal record of when you visit our website and what pages you view. Although cookies do not identify you personally, they may be linked to information we hold about you. We may also use and disclose cookies in relation to third party advertising programs to display more relevant advertisements on our website and on third party websites.

Changes to this policy

29. If Resimax Group decides to update or change this policy, including with respect to how we deal with personal information or the types of personal information we hold, we will post changes to our Privacy Policy page on our websites. Please remember to refer back to this online policy regularly to view the most current version. You can also contact us using the details below to ask for a copy of our privacy policy.

Contacting us

30. If you require further information regarding our Privacy Policy, please contact us at info@resimaxgroup.com.au or on 1300 858 190.

31. Should you wish to read more information about your right to privacy under the Australian Privacy Principles we recommend that you visit the Office of the Australian Information Commissioner's website at www.oaic.gov.au.

Acceptance

32. You accept that your continued use of this website includes your acceptance of this policy.

For the latest version of the Resimax Group Privacy Policy please go to <u>www.ResimaxGroup.com.au</u>

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