



# Privacy Policy

Owner	Region Legal
Application	Region
Version	9
Version Date	July 2023
Next Review Date	July 2025



# Contents

1.	Background .....	3
2.	Objective .....	3
3.	What sort of personal information does Region collect and hold and who does it collect from? .....	3
4.	Why does Region collect the information and what if I don't provide it? .....	4
5.	How information is collected .....	6
6.	Unsolicited information .....	6
7.	Direct Marketing Communications .....	7
8.	Opting Out .....	7
9.	To whom is my personal information disclosed? .....	7
10.	Does my personal information leave Australia? .....	8
11.	Maintenance of the quality of information .....	8
12.	Access to and correction of personal information held by Region .....	9
13.	Complaints regarding your personal information .....	9
14.	Complaints and access to personal information held by third parties on behalf of Region .....	9
15.	Storage and security of information .....	10
16.	Notifiable Data Breaches scheme .....	10
17.	Visiting our website .....	11
18.	Credit Information: Tenants .....	11

## 1. Background

Region comprises Region Management Trust, Region Retail Trust (together, Trusts), Region RE Limited (“**Region RE**”) and any entities owned and / or managed, either beneficially or legally, by the Trusts or Region RE (“**Region**”).

## 2. Objective

- (a) This Policy sets out the approach of Region in complying with its legal requirements in respect of the collection, maintenance, storage and use of your personal information<sup>1</sup> (including sensitive information<sup>2</sup>), including requirements under the *Privacy Act 1988 (Cth)* as amended (including the Australian Privacy Principles) (**Privacy Act**).
- (b) This Policy may be updated from time to time, and so we encourage you to regularly check our website.
- (c) Region 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.

## 3. What sort of personal information does Region collect and hold and who does it collect from?

- (a) Region, and third parties on its behalf, collect personal information in order to enable Region to carry on its business. Examples of the types of personal information that may be collected by, or on behalf of, Region and from whom the personal information is collected from are as follows:

Who Region collects information from	Entity that collects information on behalf of Region	Examples of information that may be collected
<b>Tenants:</b> Prospective tenants and tenants at its shopping centres and guarantors and officers of those tenants	Region and Property Managers engaged by Region	Name, contact details (e.g. email and home address and phone numbers), and financial and payment history information.
<b>Investors:</b> Unitholders in its managed investment schemes	Link, Boardroom and Region	Name, email and home address, tax file number ( <b>TFN</b> ), bank account details and, where relevant, details of any complaint.
<b>Employees</b>	Region	Name, email and home address, next-of-kin, TFN, bank account details, background checks and superannuation

<sup>1</sup> Personal information is defined under the Privacy Act as information or an opinion about an identified individual or an individual who is reasonably identifiable, whether the information or opinion is true or not, and whether the information or opinion is recorded in a material form or not.

<sup>2</sup> Sensitive information is defined under the Privacy Act as any personal information about your racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, criminal record, health information, genetic information, biometric information or biometric templates.

		fund details. Health information including COVID-19 vaccination status (where relevant) may also be collected.
<b>Workers:</b> Prospective employees and contractors and other people who work for Region, but are not employees	Region and recruiters engaged by Region	Name, email and home address, next-of-kin, TFN, bank account details, background checks and superannuation fund details. Health information including COVID-19 vaccination status (where relevant) may also be collected.
<b>Visitors</b>	Third party service providers e.g. Wi-Fi technology service providers or car parking managers at our shopping centre sites	Where you interact with technologies operated by our third party providers (e.g. Wi-Fi/beacon/advertising technology, number plate recognition technology), our third party providers may collect and disclose to us data such as name, email, address, type of device, MAC address and log-in/log-off times.

- (b) From time to time, Region may also collect personal information about tenants, investors, workers or visitors from third

parties in the course of Region’s functions and activities.

- (c) Region only collects personal information that is relevant and appropriate for the operation of Region’s business.
- (d) Region only collects individuals’ sensitive information in limited circumstances. For example, Region may collect sensitive information from a prospective tenant so that it can make an assessment of the suitability of that prospective tenant. Region will obtain the individual’s consent prior to collecting their sensitive information.

## 4. Why does Region collect the information and what if I don’t provide it?

### 4.1.1 Prospective Tenants and Tenants

- (a) 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, Region will not be able to assess your suitability as a tenant at one of our shopping centres.
- (b) Another purpose for of collection of personal information from tenants is to administer your lease with Region. The information may be used within Region, 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, by acknowledging that your rent has been paid.

- (c) Where Region collects information from tenants and prospective tenants the information may be used for:
  - (i) the purposes of particular transactions involving the tenant or prospective tenant;
  - (ii) monitoring a tenant's compliance with their lease and performance within the relevant shopping centre; or
  - (iii) identifying other potential leasing or general commercial opportunities Region considers may be of interest to that tenant or prospective tenant.

#### 4.1.2 Investors

- (a) 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 Region 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, Region 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.
- (b) By collecting this information, Region is complying with its obligations under its Constitutions, ASIC's regulatory guides and various laws, and our internal compliance reporting requirements.

#### 4.1.3 Employees

The primary purpose of collection of personal information from employees is to establish records and systems to enable Region to pay you and review your performance, and so that Region ensures the safety of its employees, and others.

#### 4.1.4 Workers

- (a) 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 Region to pay you and review your performance. If you do not provide the requested information, Region will not be able to assess your suitability for any offered role within Region. For contractors who are individuals, if you do not provide the requested information, Region may not be able to pay you, or may have to deduct greater amounts than would otherwise be necessary for tax purposes.
- (b) If an individual's employment application is unsuccessful, Region may retain the information about that individual in case a more appropriate opportunity becomes available. Applicants may request that Region not retain this information.

#### 4.1.5 Visitors

In circumstances where we collect personal information from visitors, including through our third party providers, the primary purpose of our collection of that information is in connection with the management and security of Region's shopping centre sites, to measure customer demographics and behaviours, to improve our shopping centres, to allow us to inform you of events, activities and promotions and otherwise in connection with our business. Generally speaking, you are not obligated

to provide us with personal information. If you do not provide a third party provider with your personal information, that third party may not be able to provide you with relevant products and /or services.

#### 4.1.6 Generally

Region may be required to hold certain information for a minimum period of time as required by law. Where Region 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.

## 5. How information is collected

- (a) Region will collect personal information directly from the individual concerned, unless it is unreasonable or impractical to do so.
- (b) Region may also collect information in particular circumstances from an individual's agent or from governmental sources. In those circumstances, if necessary, Region will take reasonable steps to inform the individual that the collection has occurred and will provide any other relevant information about that collection required by the Privacy Act.
- (c) Personal information is generally collected:
  - (i) in respect of tenants: directly from the tenant or prospective tenant through a tenant application, an "intention to lease" (ITL) document or similar, or from our contracted service providers during the course of the tenancy. Occasionally, we may collect information from a third party, such as in circumstances where a third party makes a complaint about a tenant;

- (ii) in respect of investors: directly from the investor by the relevant investor updating their information on-line, or as a result of the investor making a complaint to Region. We also collect personal information from Link where an investor updates their information by sending a hardcopy form to Link or over the phone with Link;
- (iii) in respect of workers: directly from the prospective employee or individual contractor, including where individuals submit applications or register interest for employment with Region or, where the employee comes through a recruiter, from the recruiter. Region may also collect information from referees in relation to prospective employees;
- (iv) in respect of visitors: through our third party service providers, including where individuals interact with certain technologies at our shopping centre sites.

## 6. Unsolicited information

- (a) Where Region receives unsolicited information, for example from an individual who wishes to become an employee, tenant or investor, Region will, within a reasonable period after receiving the information, determine whether or not Region could have lawfully collected the information under the Privacy Act if Region had solicited the information.
- (b) If Region receives information it could not lawfully collect itself, it will destroy that information or ensure that it is de-identified where lawful and reasonable to do so.

## 7. Direct Marketing Communications

### 7.1.1 Investors

- (a) Region 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 Region.
- (b) These communications may be sent in various forms, including by telephone, post, fax, email, SMS or by other forms of electronic messages.
- (c) Where an investor of Region has opted-in or where Region is otherwise permitted to do so by law, Region may send these direct marketing communications by any of those methods to the investor. If an investor indicates a preference for a method of communication, Region will try to use that method whenever practical to do so.
- (d) An investor may opt-out of receiving marketing communications from Region at any time by using any of the opt-out facilities provided in the marketing communications or as set out below.

### 7.1.2 Tenants

- (a) Where a tenant has opted-in or where Region is otherwise permitted to do so by law, Region may send its tenants direct marketing communications and information about products and services that it considers may be of interest.
- (b) Region may also from time to time send its tenants general marketing material.
- (c) A tenant may opt-out of receiving marketing communications from Region at any time by

using any of the opt-out facilities provided in the marketing communications or as set out below.

### 7.1.3 Visitors

- (a) Where a visitor has opted-in or where Region is otherwise permitted to do so by law, Region may send its visitors direct marketing communications and information about products and services that it considers may be of interest. Region may also from time to time send its visitors general marketing material.
- (b) A visitor may opt-out of receiving marketing communications from Region at any time by using any of the opt-out facilities provided in the marketing communications or as set out below.

## 8. Opting Out

- (a) Investors, tenants and visitors can opt out from receiving direct marketing communications. In order to opt-out, please contact the Privacy Officer by emailing [legal@regiongroup.au](mailto:legal@regiongroup.au).
- (b) For investors, even if you opt-out of receiving direct marketing communications, Region will still send you essential information about your account, your investment in Region and other information required by law.

## 9. To whom is my personal information disclosed?

- (a) Region does not provide your personal information to third parties, except as stated below. Region has taken reasonable steps to ensure that these third parties comply with the *Privacy Act 1988 (Cth)* and this Privacy

Policy. Personal information may also be disclosed to other members of Region.

- (b) From time to time, Region 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.
- (c) Parties to whom Region may disclose relevant personal information include:
  - (i) our employees and related bodies corporate;
  - (ii) third party suppliers and service providers;
  - (iii) specific third parties authorised by you to receive information held by us;
  - (iv) 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 Region's behalf;
  - (v) valuers, where Region is seeking to revalue a property or lease, and to its financiers;
  - (vi) the Australian Securities Exchange, the Land and Property Information Services in each state and territory of Australia, the Australian Securities and Investment Commission and other regulatory authorities where required by law; and
  - (vii) parties to whom Region has outsourced various functions related to the operation of Region's business e.g. technology services, registry services, property management

services or facilities management services; and other third parties that Region reasonably considers may provide relevant products or services of interest to tenants or investors.

## 10. Does my personal information leave Australia?

Region will only send your personal information outside Australia:

- (a) if we are authorised to do so by law;
- (b) for any of the purposes set out in this Policy (but only to parties that are subject to obligations in relation to personal information no less onerous than those in this Policy); or
- (c) if you have consented to us doing so.

In the course of our ordinary business operations, we commonly disclose personal information to third parties located in the following regions: America and Asia Pacific.

## 11. Maintenance of the quality of information

- (a) Region 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.
- (b) Region may from time to time delete or de-identify information about you when it is no longer needed or there is no longer a legal requirement for the information to be kept.



## 12. Access to and correction of personal information held by Region

- (a) If an individual wishes to access personal information that Region holds about them or to correct any errors or omissions in 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 Region, you will need to contact that third party directly and comply with their procedures.
- (b) To ensure the integrity and safety of the personal information, Region will only disclose personal information to an individual where required to do so by law and on satisfaction of its internal procedures. Depending on the nature of the request, Region may ask you to put your request in writing, verify your identity and sign an enquiry form, which will be sent to you.
- (c) To contact the Privacy Officer you should either:
  - Email: [legal@regiongroup.au](mailto:legal@regiongroup.au)
  - Write to: Privacy Officer  
Region Group  
Level 5, 50 Pitt Street  
SYDNEY NSW 2000

## 13. Complaints regarding your personal information

- (a) You can make a complaint about the way in which Region has handled your personal information by writing to Region's Privacy Officer. Region's Privacy Officer will endeavour to act promptly to investigate the complaint and determine whether a

breach of this Policy or the Privacy Act has occurred and what action, if any, to take.

- (b) Region's Privacy Officer will take any privacy complaint seriously and will aim to resolve any such complaint in a timely and efficient manner.
- (c) If you have any questions or concerns about Region's collection, use or disclosure of personal information, or if you believe Region has not complied with this Policy or the Privacy Act, you may also contact the Office of the Australian Information Commissioner (which is the regulator responsible for privacy in Australia) as follows:
  - Email: [www.oaic.gov.au](http://www.oaic.gov.au)
  - Write to: Director of Compliance  
Office of the Australian Information Commissioner  
GPO Box 5218  
SYDNEY NSW 2001  
Phone: 1300 363 992
- (d) Complaints must be made in writing.

## 14. Complaints and access to personal information held by third parties on behalf of Region

### 14.1.1 Investors in Region

- (a) Region has outsourced its registry function to Link Market Services Limited ("Link"). Link has developed a privacy policy dealing with the information it collects on Region's behalf. To obtain a copy of Link's privacy policy:
  - Email: [privacy.officer@linkgroup.com](mailto:privacy.officer@linkgroup.com)
  - Write to: Privacy Officer  
Link Market Services Limited  
Locked Bag A14

SYDNEY SOUTH NSW 1235

- (b) You should contact the Link Privacy Officer if you as an investor:
  - (i) have a complaint about privacy; or
  - (ii) would like details of your personal information held by Link on behalf of Region; or
  - (iii) would like to correct your personal information held by Link on behalf of Region.
- (c) 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 Region's Privacy Officer (contact details set out in section 12 of this Privacy Policy).
- (d) If your holding is sponsored by a broker, you will need to contact your broker to update your personal information.

#### 14.1.2 Tenants or Prospective Tenants of Region

- (a) Region has outsourced aspects of its property management to various external service providers ("Property Managers").
- (b) You should contact Region's Privacy Officer to obtain the contact details of the relevant Property Manager if you are a prospective tenant or a tenant and:
  - (i) have a complaint about privacy; or
  - (ii) would like details of your personal information, which that Property Manager holds on behalf of Region; or
  - (iii) would like to correct your personal information held by the relevant Property Manager on behalf of Region.

- (c) For your protection, the Property Manager may only disclose personal information where required to do so by law and on satisfaction of its internal procedures. If you are not satisfied by the relevant Property Manager's response to your privacy concerns you should contact Region's Privacy Officer (contact details set out in section 12 of this Privacy Policy).

## 15. Storage and security of information

- (a) Region takes all reasonable steps to protect your personal information from loss, unauthorised access, destruction, misuse, modification, interception or disclosure. Region may store your files with a third party data storage provider.
- (b) Region maintains physical security measures over its physical premises, and a range of computer and network security measures (such as user system access controls, firewalls, data encryption) to protect the information that Region holds. Region's employees are also required to maintain the confidentiality of any personal information held. If other parties provide support services, Region generally requires them to agree to appropriately protect the privacy of the information provided to them.
- (c) Region does not sell personal information to third parties.

## 16. Notifiable Data Breaches scheme

In the event of any loss or unauthorised access or disclosure of your personal information that is likely to result in serious harm to you, Region will

investigate and notify you and the Australian Information Commissioner as soon as practicable, in accordance with the Privacy Act.

## 17. Visiting our website

- (a) When you visit Region's website under the domain name [www.regiongroup.au](http://www.regiongroup.au), Region collects certain anonymous information arising out of your visit. That information includes the date and time of your visit, how long you spent on Region'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 Region's website (specifically, the user-agent and IP address sent by your web browser).
- (b) None of this information allows Region to personally identify you or your email address. Region uses this information in an aggregated form to help us understand patterns of use of this website, to measure the effectiveness of this website and produce statistical usage reports. Region'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.
- (c) Region's website does not ask you for, or capture, any of your personal information.

## 18. Credit Information: Tenants

- (a) Region may collect the following kinds of credit information and disclose this

information with Equifax Australia Pty Ltd ("**Equifax**"):

- (i) a tenant's personal identification information; and
- (ii) lease repayment and arrears information.

("credit information")

- (b) Region exchanges this credit information for the purposes associated with the administration of the tenant's lease, including arrears management, with Equifax. Equifax is a credit reporting body. You may obtain a copy of Equifax's policy about their management of your credit information and their contact information at <https://www.equifax.com.au/credit-reporting-policy>.