



Privacy Policy

GDI Property Group (“Group”)

28 July 2014

GDI Property Group

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1. Privacy Policy

GDI Property Group comprises the stapled entities GDI Property Group Limited ACN 166 479 189 and GDI Property Trust ARSN 166 598 161. The responsible entity of GDI Property Trust is GDI Funds Management Limited ACN 107 354 003 AFSL 253 142.

This Privacy Policy explains GDI Property Group's information handling practices, including in relation to personal information collected by GDI Property Group. Where appropriate, GDI Property Group will handle personal information relying on the related bodies corporate exemption and the employee records exemption in the Privacy Act.

You understand and agree that we collect, use and disclose your personal information in accordance with this Privacy Policy.

GDI Property Group is bound by the Australian Privacy Principles in the Privacy Act 1988 (Cth) and we take these privacy principles seriously.

2. Unlisted funds investors

Collection

GDI Property Group collects information from investors in order to process their investment applications, to ensure they receive information about their investment, to pay to them any entitlements (such as income and capital distributions), and to advise investors and prospective investors of other investment opportunities in which GDI Property Group believes they may have an interest.

GDI Property Group collects this information from completed application forms (for example, from an Information Memorandum), from an advice from an investor (or his or her financial adviser) of changes to this information, and from a written or verbal request from an investor.

Non-provision of Information

An investor is not obliged to provide GDI Property Group with any information it requests. However, if an investor chooses not to provide the requested information, or the information is incomplete or inaccurate, GDI Property Group may be unable to promptly process the investor's application, update the investor's recorded details, or advise the investor or prospective investor of investment opportunities.

Pursuant to Anti-Money Laundering (AML) Legislation and GDI Property Group's AML Policy, GDI Property Group will not process an investor's application until such time as that investor has been identified through the provision of sufficient information.

Furthermore, GDI Property Group may not be able to contact the investor, or provide the investor with his or her entitlements until such time as the information requested is provided.

Use of Information Provided

GDI Property Group collects personal information from its investors and prospective investors so that it may establish their identity if the investor or prospective investor should contact GDI Property Group for information regarding their investment or wish to update the personal information that GDI Property Group holds about them; to report the progress of their investment to them; and to provide the investor or prospective investor with details of other investment opportunities.

The personal information GDI Property Group holds will not be used for any other purpose without the investor's or prospective investor's consent (except where permitted or required by law).

3. Tenants and prospective tenants

Collection

GDI Property Group collects the following types of personal information from unincorporated tenants and guarantors during negotiations for, and during the term of, the lease/licence for premises, storage space, car park spaces and other accommodation requirements at GDI Property Group properties:

- contact and insurance details;
- ABNs;
- information as to tenants' and guarantors' financial standings and tenants' business experience; and
- other assorted financial and trading information.

We collect personal information from tenants and prospective tenants from them directly as well as from other sources including publicly available information, tenant representatives, information service providers and tenants and prospective tenants legal and other advisors.

Use of information

This information is required to evaluate whether a lease or licence should be granted to the tenant, to assist GDI Property Group to manage the relationship with the tenant and to monitor the performance of the property. Occasionally, the information may also be made available to a third party in connection with any transaction involving the ownership or management of the property.

If a tenant provides GDI Property Group with direct debit or direct credit details, GDI Property Group may disclose those details to GDI Property Group's bank to facilitate the provision of that service.

GDI Property Group properties are under video and camera surveillance. When entering GDI Property Group properties the personal information and images of individuals may be collected by GDI Property Group. This information is used by GDI Property Group in connection with the management and security of the property.

4. Securityholders

GDI Property Group maintains securityholder registers through an external services providers, Link Market Services. GDI Property Group requires that Link Market Services comply with the Australian Privacy Principles and Privacy Act when performing these services.

Personal information collected includes contact, bank account and security holding details and tax file numbers. This information is used to carry out registry functions such as payment of distributions, sending annual reports, notices of meetings, notifications to the Australian Taxation Office and other relevant information.

Securityholders can find out more about how our registry handles their personal information on their behalf by contacting Link Market Services, whose details appear at the bottom of this Privacy Policy.

5. Disclosure

GDI Property Group may need to provide an investor's personal information to its agents, contractors, third party service providers (including GDI Property Group entities) an investor's personal representative, attorney or agent, or financial institution, government and other regulatory agencies where required. Strict controls are in place to ensure that such information is held, used or disclosed in accordance with the Australian Privacy Principles and this Privacy Policy.

6. Access to and correction of personal information held

You may at any time:

- Request access to personal information
- Request correction of personal information
- Make a complaint.

GDI Property Group may charge a reasonable fee to cover its costs in providing this information to the investor or prospective investor.

GDI Property Group aims to ensure that the personal information it holds, particularly for unlisted investors, is accurate and up to date and investors or prospective investors should contact GDI Property Group immediately with any changes. An investor or prospective investor should also contact GDI Property Group if he or she does not wish information to be disclosed to his or her financial adviser or does not wish to receive marketing information. GDI Property Group will assume that an investor or prospective investor has consented to its using personal information for the purposes described unless it is otherwise contacted by the investor or prospective investor.

The GDI website can be used anonymously. GDI does not collect identifiable personal information about you if you only browse the site. We may store some information on your computer to improve the quality of your visit to the GDI website. With most internet browsers you can erase this information, known as “cookies”, from your computer’s hard drive, block all cookies or receive a warning before a cookie is placed on your system. Check the “Help” menu of your browser for more information on how to change your cookie preferences.

Please contact our Privacy Officer using the details set out below if you wish to:

- ask any questions or provide feedback about this Privacy Policy or our approach to privacy;
- make a request for access to or a correction of any personal information that we may hold about you; or
- make a complaint about the way in which we have handled your personal information.

GDI endeavours to respond to any request or complaint within a reasonable period of time. Further information can be obtained from the Office of the Australian Information Commissioner at www.oaic.gov.au.

Email: info@gdi.com.au

Phone: +612 9223 4222

Mail: Privacy Officer
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