

Privacy Policy

Your privacy is important to us

QIC Limited and its subsidiaries (together “QIC”, or “we”) are committed to protecting your privacy, in compliance with the National Privacy Principles (NPPs) and the *Privacy Act 1988* (Cth).

We are committed to being open about how we use personal information and this Policy sets out how we handle your information.

Collection of information

We limit our collection of personal information¹ to those details we identify as necessary for the lawful purposes of our business. Being a wholesale funds manager, we do not collect or hold personal information in relation to individual members of funds that invest with us. Personal information will only be collected by lawful and fair means from the individual concerned or their representative. The collection of ‘sensitive information’² will only be in accordance with the law.

We will inform you at or before the time of collection (or as soon as possible afterwards) of the purposes for collection, to whom your information might be disclosed and any other relevant details that will help you to ensure we are protecting your privacy.

We take reasonable steps to keep personal information as accurate, complete, and up-to-date as is necessary for the purposes we have identified.

Handling of information

We only collect and use information for the purpose of providing our products or services, including sending you information, or undertaking our business. Examples of who we usually collect information from, types of information, purposes for collection and method of collection are contained below:

¹ **‘Personal information’** is information or an opinion (including information or an opinion forming part of a database,) whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.

² **‘Sensitive information’** is a subset of personal information. It means information or an opinion about an individual’s 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 preferences or practices, criminal record or health. As a general rule, the only type of sensitive information we hold is in relation to an individual’s professional or trade association membership.

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Person	Types of information	Identified purposes	Method of collection
Key individuals employed by our investment clients or their representatives	Business and personal contact details, family information (such as name of spouse/partner, and details of children), social preferences (information which enables us to tailor events and entertainment), special dietary information	Client relationship management, business development, seminars and other client events, and for the conduct of daily business operations	Verbally, directly from the individual or personal assistant / secretary
Tenants or key individuals associated with the corporate tenants of various retail and commercial properties held as assets of QIC investment funds	Financial and contact details	Leasing negotiations, decisions and documentation, operational tenancy communications, and sale of premises	Leasing documentation and communications with tenants and solicitors
Potential employee candidates	Employment history, experience, qualifications, contact details, and checks as to criminal history, personal insolvency and regulatory sanction	Assessment for suitability for a current or future position	Resumes received from applicants in response to positions advertised, or unsolicited resumes, or completion of a criminal history / insolvency check form (or by way of a response received from an external agency verifying the details provided on the form)
Industry-related contacts and other individuals interested in QIC or the funds management industry	Contact details (including job title and name of their organisation)	Distribution of newsletters and other publications to provide regular information about the views and operations of QIC	Directly from the individual, either verbally or via a form for updating details

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Key individuals who supply (or are employed by organisations that supply) goods or services to QIC – this includes those who facilitate our investment transactions	Contact details and possibly bank account details (where financial transactions are undertaken)	In relation to the supply of the goods and services and to facilitate the credit and payment arrangements	From the individual directly, usually verbally or from transaction documentation
Individuals in respect of who we are obliged by law to conduct anti-money laundering and counter terrorism financing checks	Copies of identification documents.	To enable QIC to comply with its anti-money laundering and counter terrorism financing obligations	Directly from the individual, either verbally or via a form for collecting details

Disclosure of information

At QIC, personal information is strictly confidential. We will only share information within the QIC group, with commercial partners or with suppliers who perform services for us or on our behalf and only in compliance with the law. This may include the transfer of information outside Australia. Any information sharing will be governed by our strict standards and policies, and where appropriate, confidentiality agreements to ensure your information is secure and treated with the utmost care and respect.

Storage of information

We protect personal information with appropriate safeguards and security measures and restrict access to those who have a legitimate business purpose and reason for accessing it. Personal information is only retained for as long as it is necessary for the identified purposes or as required by law.

Information access

We will give you, or your authorised representative, access to your information unless the request is frivolous, vexatious or there are other lawful reasons to restrict access. We may

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require identification to ensure the person requesting access is entitled to such access. If you, or your representative, are denied access to your information, we shall provide reasons for the denial.

Checking and amending information

At QIC, decisions and actions may be taken or made on the basis of personal information in our possession and we take reasonable steps to keep personal information as accurate, complete, and up-to-date as is necessary.

If you believe any part of the information is inaccurate, incomplete or not up-to-date, you should contact your usual QIC contact and request we amend it accordingly. We may ask you to put your request in writing. If we are reasonably satisfied our records need amendment, we will make the amendment as soon as possible. If we do not agree our records need amendment, we will inform you of the reason(s) and you may require us to keep a statement on our records that you believe the information is inaccurate, incomplete or not up-to-date.

Resolving complaints

If you have any questions, concerns or complaints about the treatment of your personal information, the first step is to discuss the issue with your usual QIC contact.

If your concerns have not been resolved to your satisfaction, please contact our Privacy Compliance Officer on +61 7 3360 3922 or by email at privacy@qic.com. We may request you put your query in writing.

If after contacting our Privacy Compliance Officer your concerns remain unresolved, you may contact office of the Federal Privacy Commissioner on 1300 363 992, or by email on privacy@privacy.gov.au You can also visit their website at www.privacy.gov.au