



**Home
Consortium**

Privacy Policy

HealthCo Healthcare and Wellness REIT

HealthCo Healthcare and Wellness REIT

Privacy Policy

1. Introduction

- 1.1 The Group has adopted this Privacy Policy to ensure that it complies with its obligations under the Australian Privacy Principles in the *Privacy Act 1988* (Cth) (**Privacy Act**). For the purposes of this Policy, the **Group** means HCW Funds Management Limited (**RE**) as responsible entity for HealthCo Healthcare and Wellness REIT (**HealthCo, we and us**) and any entities owned and controlled, either beneficially or legally, by HealthCo or the RE.
- 1.2 This Privacy Policy explains the Group's information handling practices including in relation to personal information collected by the Group. Where appropriate, and to the extent permitted by applicable law, the Group will handle personal information relying on the related bodies corporate exemption and the employee records exemption in the Privacy Act.
- 1.3 By using any of our services or providing any services to us, you confirm that you have read and agree to the terms of this Privacy Policy. By accepting this Privacy Policy, you expressly consent to the collection, use, disclosure and handling of your personal information in accordance with this Privacy Policy. If you are an organisation, by accepting this Privacy Policy, you confirm that you have obtained the express consent from your personnel to the collection, use, disclosure and handling of their personal information in accordance with this Privacy Policy.
- 1.4 This Privacy Policy is in addition to any other terms and conditions applicable to this website or any other services we provide. We will post any changes to this Privacy Policy on this website, so we encourage you to check this Privacy Policy from time to time.

What personal information is collected and why

2. Customers

What we collect

- 2.1 We collect information about individuals:
- (a) who use our websites, mobile applications, social media and other online services (**Online Services**);
 - (b) who register, login or subscribe to join our programs, including shopper programs (**Member Programs**);
 - (c) who purchase gift cards or otherwise transact with us, participate in surveys or competitions and register for or use any of our services, including guest wifi services;
 - (d) who are involved in or witness an incident in our property;
 - (e) who use, or are seeking to use, our car parks, storage spaces, kiosks and other premises; and
 - (f) to whom we provide other products or services from time to time.
- 2.2 The types of information we collect can include name, contact details, gender, identification information, payment details, registration and activity details relating to our Online Services (such as the date and time you accessed each page on our website; the fully qualified domain name from which you access our websites, or alternatively, your IP address; the URL of any webpage from which you accessed our websites; cookies which track your visits to our websites and the web browsers that you are using and the pages you accessed), Member Programs and other services, transaction details, interests and preferences, device details (including device identifiers, usage and location data), information submitted in forms, details of incidents involving you at our properties, enquiry/complaint details and records of communications and interactions.

HealthCo Healthcare and Wellness REIT

Privacy Policy

- 2.3 Our properties may from time to time be under video and camera surveillance. When entering our properties the personal information and images of individuals may be collected by us.
- 2.4 Except as required for employment purposes, we generally do not collect “sensitive information” as described in the Privacy Act. If we do, we will only do so with your express consent and in accordance with the Privacy Act.

How we collect

General

- 2.5 We collect, hold, use and disclose your personal information for purposes including to provide, administer, improve and personalise our services, process payments, identify you, communicate with you (including direct marketing, subject to prior consent), conduct promotions, investigate and deal with unlawful activity and misconduct, respond to lawful information requests from courts, government agencies and lawyers, protect our lawful interests and deal with your enquiries and concerns.
- 2.6 If a third party acquires or wishes to acquire, or makes inquiries in relation to acquiring, an interest in, or certain assets or businesses of the Group we may disclose personal information to that third party or its advisors as part of that process.
- 2.7 Personal information we collect may also be used for purposes related to the Group’s research (including market research), planning, product and service development, security, testing, customer relationship management and records management.
- 2.8 To help us understand and serve you better, we may combine personal information we hold about you with personal and non-personal information that we collect from different third party sources. For example, we may obtain demographic data from an information service provider to tell us about the interests of people in your postcode and use it to help us predict which products and services might appeal to you. These sorts of activities may be conducted in connection with our Online Services and Member Programs as described further below.

Online Services

- 2.9 Users of our Online Services are not required to provide us with any personal information. However, we may not be able to provide the information or service a user request – including access to, and use of, a Member Program – if the personal information which is indicated as mandatory is not provided.
- 2.10 We may also collect aggregated information which tells us about users of our Online Services but not the identity of those users, unless they register to join a Member Program (in which case, the identity of a user may become apparent). For example, we may collect information about the date, time and duration of visits and which pages or parts of those Online Services are most commonly accessed. We may also collect internet address domain names, the previous websites visited and the types of browser visitors are using. This information is used by us for internal research, statistical and website development purposes. It may also be used by us to provide users with offers, discounts, promotions, advertising, products, services and other content.
- 2.11 Our Online Services may use “cookies”. A cookie is a small message in a text file, and the message is then sent back to the server each time the browser requests a page from the server.
- 2.12 Cookies may be used by us for a variety of purposes. For example, we may use cookies to recognise a browser which has previously accessed our Online Services and customise our Online Services according to previous preferences and behaviour. Cookies may also be used to manage security and store information about the type of browser being used. With most Internet browsers, users can erase cookies from their computer’s hard drive, block all cookies, or receive a warning before a cookie is

HealthCo Healthcare and Wellness REIT

Privacy Policy

stored. However, some parts of our Online Services may not function fully for users who disallow cookies.

- 2.13 Our Online Services may, from time to time, contain links to the websites and online services of other organisations which may be of interest to you. Those other organisations are responsible for their own privacy practices and you should check those websites and online services for their respective privacy policies.

Member Programs

- 2.14 If you join a Member Program, we may:
- (a) collect and process personal information such as your name, email and other contact details (including any information provided by filling in forms using our Online Services); and
 - (b) collect data about your usage history on our Online Services and other websites operated by third parties which allow your device to be added to one or more interest categories.
- 2.15 We use this data for the purpose of analysing usage of our Member Programs, improving our content and product offerings, customising our content, layout and services and, with your consent, providing you with offers, discounts, promotions, advertising and services which are targeted to your interests.
- 2.16 Our Online Services may include functionality that makes use of the hosting device's geographic position on approach and entry into a participating asset. This means that if you joined a relevant Member Program, and you use one of those Online Services, you may be located by us or our service providers and contractors by reference to the location of your device. With your consent, we may use this functionality to locate and send you offers, discounts, promotions, advertising, products, services or other content on your device.
- 2.17 If you do not consent to us:
- (a) using data about your browsing activity to contact you and deliver offers, discounts, promotions, advertising or other content targeted to your interests; or
 - (b) using data about your device location to provide you with location-based services available through a Member Program,
- 2.18 you are always free to delete your cookies and cease participation in the Member Program. Your device and browser may also give you options to turn off location services either generally or for particular apps or sites.

3. Tenants and prospective tenants

What we collect

- 3.1 The 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 kiosks at the Group's properties:
- (a) Contact and insurance details;
 - (b) ABNs;
 - (c) Information as to tenants' and guarantors' financial standings and tenants' business experience; and
 - (d) other assorted financial and trading information.

HealthCo Healthcare and Wellness REIT

Privacy Policy

- 3.2 We collect personal information directly from you and indirectly from other third party sources including publicly available information, your representatives, information service providers, our related bodies corporate and the parties with which we exchange information as described here.

Why we collect

- 3.3 This information is required to evaluate whether a lease or licence should be granted to the tenant; to enable the Group to perform its obligations; to assist the Group to manage the relationship and to monitor the performance of the property. The information may also be made available to others in connection with any transactions involving the ownership or management of the property.
- 3.4 If a tenant provides the Group with direct debit or direct credit details, the Group may disclose those details to the Group's bank to facilitate the provision of that service.
- 3.5 The Group's properties may be under video and camera surveillance. When entering our properties the personal information and images of individuals may be collected by us. This information may be used by us in connection with the management and security of the property.

4. Employees and prospective employees

Prospective employees

- 4.1 If you apply, or we consider you, for a position with us, we may also collect information from you about your qualifications, skills, experience, character and from other third parties as a result of any screening checks (including reference, background, directorship, financial probity, identity, eligibility to work, vocational suitability and criminal record checks).
- 4.2 We collect personal information directly from you and indirectly from other third party sources including publicly available information, your representatives, information service providers, our related bodies corporate and the parties with which we exchange information as described here.
- 4.3 We collect, use and disclose your personal information to assess your application, conduct screening checks and consider and contact you about other positions.
- 4.4 We may exchange your personal information with our related bodies corporate, academic institutions, recruiters, screening check providers, professional and trade associations, law enforcement agencies, referees and your current and previous employers.
- 4.5 Without your personal information we may not be able to progress your application or consider you for positions with us.

Current and former employees

- 4.6 We may collect information relating to your current or former employment or engagement with us including information about your training, disciplining, resignation, termination, terms and conditions of employment, emergency contact details, performance, conduct, use of our IT resources, payroll matters, union or professional/trade association membership, recreation, leave and taxation, banking or superannuation affairs. We are required or authorised to collect your personal information under various laws including the *Fair Work Act 2009* (Cth), *Superannuation Guarantee (Administration) Act 1992* (Cth) and *Taxation Administration Act 1953* (Cth).
- 4.7 We collect, use and disclose your personal information for purposes relating to your employment or engagement with us including engagement, training, disciplining, payroll, superannuation, health and safety, administration, insurance (including workcover) and staff management purposes. We may exchange your personal information with our related bodies corporate, your representatives (including

HealthCo Healthcare and Wellness REIT

Privacy Policy

unions) and our service providers including providers of payroll, superannuation, banking, staff benefits, surveillance and training services. Without your personal information we may not be able to effectively manage your employment or engagement.

- 4.8 We may monitor and record your communications and interactions with us (including email, telephone and online) and operate audio and video surveillance devices in our premises for purposes including compliance auditing, maintenance, security, dispute resolution, training and where email abuse is suspected.

Service Providers

- 4.9 In the case of unincorporated entities, we collect the following information:
- (a) Contact and insurance details;
 - (b) ABNs; and
 - (c) Information as to financial standings and business experience.
- 4.10 We collect personal information directly from you and from other third party sources including publicly available information, your representatives, information service providers, our related bodies corporate and parties with which we exchange information as described in this Policy.
- 4.11 Incorporated entities may provide us with the contact details of their employees in order for both of us to perform our obligations under our agreements. If you are an incorporated entity, you confirm that you have obtained the express consent from your personnel to the collection, use, disclosure and handling of their personal information in accordance with this Privacy Policy.
- 4.12 The personal information we collect is required to enable us to perform our obligations under our agreements with you/the company you are employed by and to assist us to manage our relationship with you/the company you are employed by.

5. Exchange of Personal Information with Third Parties

- 5.1 We may share personal information within the Group and between our related bodies corporate and other companies owned or controlled by us.
- 5.2 We may also exchange personal information with our service providers and contractors such as organisations who provide archival, auditing, professional advisory (including legal, accounting and business consulting), debt collection, banking, marketing, advertising, communication, mail house, delivery, recruitment, call centre, contact management, technology, research, analytics, utility, cleaning and security services.
- 5.3 We may exchange personal information with regulatory and law enforcement authorities including police where required or authorised by law or to assist in the prevention, detection and management of unlawful conduct.

6. Storage of Personal Information

- 6.1 We hold personal information in physical files, computer systems or in a database held by us and by service providers on our behalf. We regard the security of personal information as a priority and use a number of physical and electronic security measures to protect it. Unfortunately, no data transmission over the Internet can be guaranteed as completely secure. So while we strive to protect such information, we cannot ensure or warrant the security of any information transmitted to us and individuals do so at their own risk.

HealthCo Healthcare and Wellness REIT

Privacy Policy

- 6.2 A username and password may be essential for you to use some of our Online Services or parts of them. For your own protection, we require you to keep these details confidential and to change your password regularly (if applicable).
- 6.3 Personal information is only retained for as long as it is necessary for the identified purposes, to the extent necessary for purposes reasonably related to those identified purposes (for example, resolving disputes) or as required by law.

7. Access and correction of information

- 7.1 You have a right to request access and correction of any personal information which we collect and hold about you using the contact information below. We may deny your request for access or correction in some circumstances, but if we do this, we will tell you why. Where we decide not to make a requested correction and you disagree, you may ask us to make a note of your requested correction with the information.
- 7.2 If you have registered your details for our Online Services or Member Programs, you may be able to access and update personal information on your profile, subject to any authentication and authorisation considerations, which exist to protect your security.
- 7.3 At your request, we will take reasonable steps to notify any third party to whom we have provided your personal information of the changes that have been made.

8. Contact us

- 8.1 Please contact our Privacy Officer using the details set out below if you wish to:
- (a) ask any questions or provide feedback about this Privacy Policy or our approach to privacy;
 - (b) make a request for access to or correction of any personal information that we may hold about you; or
 - (c) make a complaint about the way in which we have handled your personal information.
- 8.2 We will try to respond to, and address, any complaints or privacy issues you may have within a reasonable period of time. Any information that we provide in response may be limited to the extent permitted by any applicable law.
- 8.3 The Privacy Officer can be contacted using any of the following means:
- Email:** privacy@home-co.com.au
- Phone:** 1300 466 326
- Mail:** Privacy Officer c/- Company Secretary
HomeCo Daily Needs REIT
19 Bay Street
Double Bay NSW 2028
- 8.4 If you still feel your issue hasn't been resolved to your satisfaction, you can escalate your privacy concern by contacting the Office of the Australian Information Commissioner. The Commissioner can be contacted at:

HealthCo Healthcare and Wellness REIT Privacy Policy

Address: GPO Box 5218
Sydney NSW 2001

Phone: 1300 363 992

Email: enquiries@oaic.gov.au

Website: www.oaic.gov.au

August 2021