

# Privacy Policy

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VER Limited (ACN 609 868 000) in its capacity as responsible  
entity of Waypoint REIT Trust (ARSN 613 146 464)  
Waypoint REIT Limited (ACN 612 986 517)

Approved by the Board and effective 27 October 2023

## 1. Introduction

Waypoint REIT recognises privacy is important to you. In the course of Waypoint REIT Limited's business in Australia, there may be circumstances where Waypoint REIT Limited (ACN 612 986 517) and its related bodies corporate (including VER Limited (ACN 609 868 000), the responsible entity of the Waypoint REIT Trust), (collectively, **Waypoint REIT**) collects personal information and this Privacy Policy (**Policy**) has been developed to ensure that such information is handled appropriately.

Waypoint REIT is bound by laws governing how we collect and use your personal information including the Privacy Act 1988 (Cth) (**Privacy Act**) and other State and Territory laws such as the Health Records Act 2001 (Vic) and the Health Records and Information Privacy Act 2002 (NSW) (together the **HR Act**). Waypoint REIT is committed to protecting the privacy of individuals in accordance with the Australian Privacy Principles (**APPs**) under the Privacy Act and to protect the confidentiality of health information in accordance with the HR Act. This Policy explains how we collect, use, store, disclose, and safeguard your personal and sensitive information (including health information).

Waypoint REIT aims to be as transparent as possible in this Policy about what we do with your personal information. Consequently, we update this Policy from time to time to reflect changes in our practices or for other operational, legal, or regulatory reasons. You will find the most up-to-date version on our website at [www.waypointreit.com.au](http://www.waypointreit.com.au), and the revised version will be effective as of the date it is posted.

## 2. Who does the Waypoint REIT Privacy Policy apply to?

This Policy applies to any individuals in respect of whom Waypoint REIT currently holds, or may in the future collect, personal information.

## 3. What personal information do we collect?

The types of personal information Waypoint REIT collects about you depends on the nature of your interactions with us. In this Policy you will see the terms 'personal information' and 'sensitive information' used. These terms have the following definitions:

- **"Personal information"** has the meaning given in the Privacy Act and includes any information, or an opinion, about an identified individual, or an individual who is reasonably identifiable, whether true or not and whether recorded in a material form or not.
- **"Sensitive information"** is a subset of personal information is more protected under Privacy Laws than are other forms of personal information and includes information or an opinion about a person'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 orientation or practices;
  - criminal record; and
  - Sensitive information about an individual also includes, health information, genetic information that is not otherwise health or bio-metric information and templates.
- **"Health information"** under the Privacy Act, is a subset of sensitive information. We treat health information as including information about an individuals' physical, mental, or psychological health.

Health information includes any information or opinion collected in relation to:

- the health or a disability or injury (at any time) of an individual;

- an individual's expressed wishes about the future provision of health services;
- a health service provided, or to be provided to an individual;
- a health service we provide to them;
- the donation, or intended donation, by an individual of his, her or their body parts, organs or body substances; or
- genetic information that is, or could be, predictive of the health of the individual or a genetic relative of the individual.

In this Policy, and unless otherwise stated, all references to 'personal information' include 'sensitive information'.

## 4. What information is not personal information?

Information where Waypoint REIT has removed any reference to a person, so that the person cannot be reasonably identifiable from the information, is not personal information.

## 5. How is personal information collected?

Waypoint REIT collects personal information in a variety of ways while conducting its businesses, including:

- interacting with people via our website, for example, to register to receive email alerts;
- direct communication including email, letters and over the telephone (e.g., to lodge a complaint);
- engaging suppliers, contractors, and other personnel, including Link Market Services who provide registry, investor communications and related services for Waypoint REIT; and
- responding to questions regarding our business.

The kinds of personal information collected and held by Waypoint REIT include (depending on the circumstances) names, addresses and other contact details about a person's work experience and other qualifications, date of birth, driver's licence details, bank account details, photographs and video footage, and geolocation of the individual.

Waypoint REIT may collect personal information from you or from other sources, such as a publicly maintained record or from an information service provider. Where reasonable and practicable, Waypoint REIT will collect personal information directly from the person and inform the person that this is being done.

However, in some circumstances, it is necessary for Waypoint REIT to collect personal information through third party service providers or agents, from a source of publicly available information or from an employer (e.g. where a contractor provides personal information about its staff) or from Waypoint REIT's share registry provider, Link Market Services.

At or soon after the time when Waypoint REIT collects personal information, Waypoint REIT will take reasonable steps to ensure that the person is aware of which Waypoint REIT company has undertaken the collection, the purpose(s) of the collection, the main consequences (if any) if the information is not collected, the types of organisation (if any) to which the information may be disclosed (including those located overseas), any law that required the particular information to be collected, and the fact that this Policy contains details on access, correction and complaints.

Personal information collected by Waypoint REIT is held in a variety of formats, including in electronic databases, hard copy and on Waypoint REIT's computer systems. Personal information that Waypoint REIT stores is only made available to employees who need access to it, on personal devices such as computers and smartphones.

If Waypoint REIT receives personal information that Waypoint REIT has not requested (unsolicited information) and Waypoint REIT determines that Waypoint REIT could not have collected that information under the APPs if Waypoint REIT had requested it, then Waypoint REIT will destroy or de-identify the information if it is lawful and reasonable to do so.

Where practicable, you may deal with Waypoint REIT anonymously or by using a pseudonym, however Waypoint REIT may not be able to provide you with the information that you seek without verifying your identity.

## 6. Do we collect sensitive information?

Waypoint REIT will not collect sensitive information unless the person to whom it relates consents to the collection and the information is reasonably necessary for one or more of Waypoint REIT's functions or activities, except where the collection is required or authorised by law, is necessary to prevent or lessen a serious and imminent threat to the person's (or another person's) life or health or is necessary in relation to legal proceedings (current, anticipated or potential), or another permitted exception in the Privacy Act applies.

## 7. How do we use personal information?

How we can use personal information depends on the reason for which it was collected.

Waypoint REIT may use personal information for its primary purpose of collection (examples include the delivery of email alerts, resolution of a complaint or management of our property portfolio) or for any related secondary purpose that we could reasonably be expected to use the personal information for.

## 8. Disclosure of personal information

Waypoint REIT respects the privacy of personal information, and we will take reasonable steps to keep it strictly confidential.

Personal information is used for the purposes for which it was given to us, or for purposes, which are directly related to one or more of our functions or activities.

Personal information may be disclosed to government agencies, related entities, and other recipients from time to time, if the individual:

- has given consent; or
- would reasonably expect the personal information to be disclosed in that manner.

Waypoint REIT will only disclose personal information to third parties without the consent of the person to whom it relates if the disclosure is:

- a) necessary to protect or enforce Waypoint REIT's legal rights or interests or to defend any claims;
- b) necessary to prevent or lessen a serious threat to a person's health or safety;
- c) required or authorised by law;
- d) permitted by another exception in the Privacy Act; or
- e) disclosure is reasonably necessary for a law enforcement related activity.

Under no circumstances will Waypoint REIT sell personal information without the consent of the person to whom it relates.

An individual Waypoint REIT company may disclose personal information to a related Waypoint REIT company, subject to the provisions of the Privacy Act. In such circumstances, the related company will only use the personal information for the same purposes that the disclosing Waypoint REIT company is authorised to use the personal information for.

## 9. Keeping your information safe

Waypoint REIT will take all reasonable steps to ensure that all personal information held by Waypoint REIT is secure from any misuse, unauthorised access, disclosure, interference and loss, alteration, or destruction. However, Waypoint REIT does not guarantee that personal information cannot be accessed by an unauthorised person (e.g., a hacker) or that unauthorised disclosures will not occur.

Waypoint REIT uses secure systems and environments to hold your information (e.g., employees are trained how to keep your information safe and secure and are bound by internal processes and policies that confirm this, we have technology that prevents malicious software or viruses and unauthorised persons from accessing systems, building security i.e., ID cards to protect our offices, destroying or de-identifying data when no longer required where appropriate, requiring service providers and other third parties to whom Waypoint REIT discloses personal information to comply with the Privacy Act etc.). Waypoint REIT will take reasonable steps to destroy or permanently de-identify personal information if it is no longer needed for the purposes for which Waypoint REIT is authorised to use it. Consequently, if you request access to your old personal information, we may not be able to provide you with your records where they have been destroyed or de-identified.

## 10. Accessing, updating and correcting your personal information

A person may request to seek access to, update, correct or delete personal information about them held by Waypoint REIT. Such a request must be made in writing to our Privacy Officer using the contact details set out below.

Waypoint REIT will grant a person access to their personal information as soon as possible, subject to the circumstances of the request.

A request to access personal information will be rejected if:

- a) the request is frivolous or vexatious;
- b) providing access would have an unreasonable impact on the privacy of another person;
- c) providing access would pose a serious and imminent threat to the life or health of any person;
- d) providing access would prejudice Waypoint REIT's legal rights; or
- e) there are other legal grounds to deny the request.

If we do not think the information needs to be corrected, we will inform you of the reasons and add a note to the personal information stating that you disagree with our decision.

Waypoint REIT will not charge a fee for requesting access to, correcting or deletion of your personal information. Waypoint REIT will only charge a fee to access information in exceptional circumstances, and where your request is particularly onerous. Waypoint REIT will let you know in advance of levying any fee (to confirm that you still wish to proceed with your request).

## 11. Correcting personal information

Waypoint REIT will take reasonable steps to ensure the accuracy and completeness of the personal information we hold. However, if a person believes that any personal information that we hold about them is inaccurate or out of date, then they should contact Waypoint REIT in writing at the address below.

## 12. Use of Cookies

We use the term "cookies" to refer to cookies and other similar technologies covered by the EU Directive on privacy in electronic communications.

- **What is a cookie?**

Cookies are small data files that your browser places on your computer or device to help websites to remember things that a browser/user had done such as which buttons were clicked. This may include information such as your devices' Internet Protocol. Cookies help your browser navigate a website and the cookies themselves cannot collect any information stored on your computer or your files. When a server uses a web browser to read cookies, they can help a website deliver a more user-friendly service. To protect your privacy, your browser only gives a website access to the cookies it has already sent to you.

- **Why do we use cookies?**

We use cookies to learn more about the way you interact with our content and help us to improve your experience when visiting our website. Cookies remember the type of browser you use and which additional browser software you have installed. They also remember your preferences, such as language and region, which remain as your default settings when you revisit the website. Cookies also allow you to rate pages and fill in comment forms. Some of the cookies we use are session cookies and only last until you close your browser, others are persistent cookies which are stored on your computer for longer.

- **How are third party cookies used?**

For some of the functions within our websites we use third party suppliers, for example, links to Link Market Services, our share registry service provider. These links (and any other content from third party suppliers) may contain third party cookies and you may wish to consult the policies of these third party websites for information regarding their use of cookies.

- **How do I reject and delete cookies?**

We will not use cookies to collect personally identifiable information about you. However, should you wish to do so, you can choose to reject or block the cookies set by Waypoint REIT or the websites of any third-party suppliers by changing your browser settings – see the Help function within your browser for further details. Please note that most browsers automatically accept cookies so if you do not wish cookies to be used you may need to actively delete or block the cookies.

You can also visit [www.allaboutcookies.org](http://www.allaboutcookies.org) for details on how to delete or reject cookies and for further information on cookies generally. For information on the use of cookies in mobile phone browsers and for details on how to reject or delete such cookies, please refer to your handset manual.

**Note, however, that if you reject the use of cookies, you will still be able to visit our websites but some of the functions may not work correctly.**

## 13. Concerns and complaints about your privacy

If there are any questions about how we manage your personal information, how you can correct your personal information, how you can make a complaint, or how you can get a printed copy of this Policy, please contact our Privacy Officer:

**Email:** [tina.mitas@waypointreit.com.au](mailto:tina.mitas@waypointreit.com.au)

**Phone:** +61 3 9081 8433

**Post:** Privacy Officer  
Waypoint REIT  
GPO Box 4716  
Melbourne VIC 3001  
Australia

Waypoint REIT deals with complaints via our internal complaint handling process, under which our Privacy Officer will acknowledge receipt of your complaint promptly, investigate objectively and provide a written response (within 30 days), and invite a response to our findings.

If you are not satisfied with how we have managed your privacy complaint, you may lodge a complaint with Australian Financial Complaints Authority (AFCA), of which Waypoint REIT is a member or the Australian

Privacy Commissioner Office of the Australian Information Commissioner (**OAIC**). A referral to OAIC should be a last resort once all other avenues of resolution have been exhausted.

### **AFCA**

**Website:** [www.afca.org.au](http://www.afca.org.au)

**Email:** [info@afca.org.au](mailto:info@afca.org.au)

**Phone:** 1800 931 678 (free call)

**Post:** Australian Financial Complaints Authority Limited  
GPO Box 3  
Melbourne, VIC 3001  
Australia

### **OAIC**

**Website:** [www.oaic.gov.au/privacy/privacy-complaints](http://www.oaic.gov.au/privacy/privacy-complaints)

**Email:** [enquiries@oaic.org.au](mailto:enquiries@oaic.org.au)

**Phone:** 1300 363 992

**Post:** Office of the Australian Information Commissioner  
GPO Box 5288  
Sydney NSW 2001  
Australia

For more details of how we disclose any security breaches, please view Waypoint REIT's ***Disclosure Policy***.