

Privacy Policy

NorthWest Healthcare Properties Australia PRIVACY STATEMENT

1 Your rights in relation to privacy

NorthWest Healthcare Properties Australia (which encompasses all of the NorthWest Healthcare Properties Australian corporate entities including NorthWest Healthcare Australia RE Limited, NorthWest Healthcare Australian Property Limited and NorthWest Healthcare Australia Investments Pty Ltd and its wholly owned subsidiaries) (**NorthWest**) understands the importance of protecting the privacy of an individual's personal information. This statement sets out how NorthWest aims to protect the privacy of your personal information, your rights in relation to your personal information managed by NorthWest and the way NorthWest collects, holds, uses and discloses your personal information.

In handling your personal information, NorthWest will comply with the *Privacy Act 1988 (Cth)* (**Privacy Act**) and with the 13 Australian Privacy Principles in the Privacy Act. To the extent NorthWest handles your credit information, NorthWest will also comply with the Credit Reporting Code. This policy statement may be updated from time to time.

2 What kinds of personal information does NorthWest collect?

Register information

NorthWest has collected information from the register of members (**Register**) maintained by or on behalf of the Australian Unity Healthcare Property Trust (**AUHPT**) in accordance with section 168 of the *Corporations Act 2001 (Cth)* (**Corporations Act**) for the purpose of contacting or sending material relevant to the holding of the interests recorded in the Register of AUHPT or the exercise of the rights attaching to them, or otherwise within the circumstances set out in regulation 7.9.97 of the *Corporations Regulations 2001 (Cth)*. This policy statement applies to that information.

Personal information

Personal information is information or an opinion about an identified, or reasonably identifiable, individual. During the provision of its products and/or services, NorthWest may collect your personal information.

Generally, the kinds of personal information NorthWest collects are:

- contact and identification information such as your name, address, telephone number, email address, date of birth and drivers licence number;
- where you are the director or guarantor of a commercial entity with which NorthWest transacts, financial information about your assets, occupation and

income, account balances, account activities, payment history and transactions with us or third parties;

- where you are the director or guarantor of a commercial entity with which NorthWest transacts, credit information, being credit related personal information lawfully created and accessible within the Australian credit reporting system including:
 - identification information;
 - consumer credit liability information which includes information about your credit providers and credit accounts, including the dates on which the accounts are opened and closed, their limits, and their terms and conditions (or any changes to their terms and conditions);
 - whether you have or have not met any monthly repayment obligations;
 - whether you have defaulted on a payment to NorthWest (ie. a payment that is at least 60 days overdue and over \$150 in value) provided NorthWest has first notified you of the overdue payment in accordance with the Privacy Act;
 - whether you have paid any amount previously reported as being in default;
 - that a credit provider has sought credit-related personal information about you from a credit reporting body;
 - information about the types of consumer or commercial credit, and the amounts of credit, you have sought from a credit provider;
 - information about court proceedings related to credit provided to you or for which you have applied;
 - personal insolvency information and other publicly available information relating to your credit worthiness;
 - a credit provider's reasonable belief that you have committed a serious credit infringement; and
 - any other information lawfully obtainable within the Australian credit reporting system;
- where you are the director or guarantor of a commercial entity with which NorthWest transacts, credit eligibility information which is credit-related information about you that NorthWest obtains from a credit reporting body such as Dun & Bradstreet, together with information NorthWest derives from such information based on its own analysis including internally generated scores, ratings and other assessments used to evaluate your credit worthiness.

NorthWest generally receives from Dun & Bradstreet information about existing credit accounts, previous defaults and repayment history information. Dun & Bradstreet's contact details are as follows:

Dun & Bradstreet (Australia) Pty Ltd
479 St Kilda Road
Melbourne VIC 3000
Telephone: +61 13 2333
Email: clientservices@dnb.com.au

- sensitive information including, where you are applying for a position with NorthWest, criminal record information and/or health information where relevant to NorthWest's assessment of whether you are able to perform the inherent requirements of the particular role; and
- other information such as:
 - details of enquiries you make (e.g. by completing a form on our website) and from other communications you have with us;
 - details of your marketing preferences;
 - lease information, including details of tenant or guarantor name, address and phone number; and
 - details of any feedback or comments that you provide to us or through our website.

In some circumstances NorthWest may also hold other personal information provided by you.

3 How does NorthWest collect personal information?

Generally, NorthWest collects your personal information directly from you, through the completion of a manual or online form, an interaction or exchange in person or by way of telephone, facsimile, email, post or through the use of the NorthWest website. There may be occasions when NorthWest collects your personal information from other sources such as from:

- your employer, where necessary for NorthWest to provide its products and services to your employer through you;
- the completion of an application form by another person or entity that lists you as a director, guarantor or trade reference;
- if you are a unitholder, the Registrar of Computershare Investor Services Limited;
- where you are the director or guarantor of a commercial entity with which NorthWest transacts, your accountant;

- Dun & Bradstreet or other credit reporting body;
- an information services provider;
- a publicly maintained record or other publicly available sources of information including social media and similar websites;
- NorthWest's own records about you, from which NorthWest may internally generate its own scores, assessments or deductions, particularly in relation to your credit worthiness; or
- if for recruitment purposes, an external recruitment or background screening services provider.

Generally, NorthWest will only collect your personal information from sources other than you if it is unreasonable or impracticable to collect your personal information from you.

In addition, we may collect information about you and your use of NorthWest's website through the use of automatic data collection tools. These tools collect certain standard information about your access and computer, such as your browser type, operating systems and language, access times and your Internet Protocol (IP) address.

4 Why does NorthWest need your personal information?

NorthWest collects, holds, uses and discloses your personal information where it is reasonably necessary for the following purposes:

- for the general operation of NorthWest (including asset management and the provision of other products and/or services);
- where you are the director or guarantor of a commercial entity with which NorthWest transacts, to conduct credit checks to assess your creditworthiness;
- to manage our relationship with you or an entity you represent (including to notify you of changes to our website, terms and conditions, and respond to queries or complaints);
- accounting, billing and other internal administrative purposes;
- identifying and informing you of products and services that may be of interest to you from NorthWest or selected third parties;
- assessing your application for employment with NorthWest or otherwise for the purpose of engaging you as a contractor or consultant;
- to ensure the security of our networks and systems, protect against, identify and prevent fraud and other claims;
- to analyse your use of our website, and personalise and improve your experience on our website using cookies and similar technologies;

- to facilitate our internal business operations (including for training, risk management and for developing, maintaining and testing our IT systems and infrastructure); and
- any other legal requirements.

NorthWest may also use your personal information for purposes related to the above purposes and for which you would reasonably expect NorthWest to do so in the circumstances, or where you have consented or the use is otherwise in accordance with law.

Where personal information is used or disclosed, NorthWest takes steps reasonable in the circumstances to ensure it is relevant to the purpose for which it is to be used or disclosed. You are under no obligation to provide your personal information to NorthWest. However, without certain information from you, NorthWest may not be able to provide its products and/or services to you.

5 To whom does NorthWest disclose your personal information?

NorthWest discloses your personal information for the purpose for which NorthWest collects it. That is, generally, NorthWest will only disclose your personal information for a purpose set out at paragraph 4. This may include disclosing your personal information to:

- third parties engaged by NorthWest to perform administrative or other business management functions;
- people or entities considering acquiring an interest in NorthWest's enterprise or assets;
- NorthWest's professional advisors, contractors, consultants and related bodies corporate;
- insurance providers;
- regulatory bodies; and
- any other party authorised by you or to whom we are required or authorised to disclose personal information in accordance with applicable law.

NorthWest will not disclose your personal information, including your credit information, to lenders, credit providers and credit reporting bodies, such as Dun & Bradstreet.

NorthWest's disclosures of your personal information to third parties are on a confidential basis or otherwise in accordance with law. NorthWest may also disclose your personal information with your consent or if disclosure is required or authorised by law.

6 Overseas disclosure

NorthWest may disclose personal information, including credit related personal information, to overseas recipients to provide its products and/or services and for administrative, data storage or other business management purposes. Recipients of such disclosures (including entities that are part of the Global NorthWest Healthcare Properties Group) are located in Canada, Brazil, Europe, Australia and New Zealand.

Overseas recipients may have different privacy and data protection standards. However, before disclosing any personal information to an overseas recipient, NorthWest takes steps reasonable in the circumstances to ensure the overseas recipient complies with the Australian Privacy Principles or is bound by a substantially similar privacy scheme unless you consent to the overseas disclosure or it is otherwise required or permitted by law. If you have any queries or objections to such disclosures, please contact NorthWest's Privacy Compliance Officer on the details set out in paragraph 11.

7 Direct marketing

NorthWest may use and disclose your personal information to inform you of products and services that may be of interest to you. If you do not wish to receive such communications, you can opt-out by contacting NorthWest via the contact details set out in paragraph 11 or through any opt-out mechanism contained in a marketing communication to you.

NorthWest will not use or disclose credit-related personal information for direct marketing purposes except to the extent permitted under the Privacy Act.

8 Cookies

NorthWest may collect information through cookies on our website. Cookies are small pieces of information that are stored on a user's computer. NorthWest may also use cookies to personalise your experience on our website, make it easier for you to navigate our website, and improve your experience by storing your search or login details (if any). Cookies can be disabled via your website browser; however, doing so may limit your access to some of the website's content and features. NorthWest may also use cookies to track non-personally identifiable information such as usage and volume statistics, for research purposes to further develop our website.

9 Security of your personal information

NorthWest takes steps reasonable in the circumstances to ensure that the personal information it holds is protected from misuse, interference and loss and from unauthorised access, modification or disclosure. NorthWest holds personal information in both hard copy and electronic forms in secure databases on secure premises, accessible only by authorised staff. Credit eligibility information, such as information NorthWest receives from Dun & Bradstreet for the purpose of assessing credit worthiness, is stored through equally secure methods. Staff are bound by security policies, which are regularly revised and re-issued.

NorthWest will destroy or de-identify personal information in circumstances where it is no longer required, unless NorthWest is otherwise required or authorised by law to

retain the information.

If you believe on reasonable grounds that you have been, or are likely to be, a victim of fraud, you may request Dunn & Bradstreet not to use or disclose credit related personal information it holds about you by contacting Dun & Bradstreet on the details set out in paragraph 2 above.

10 Can you access and correct the personal information that NorthWest holds about you?

NorthWest takes steps reasonable in the circumstances to ensure personal information it holds is accurate, up-to-date, complete, relevant and not misleading. Under the Privacy Act, you have a right to access and seek correction of your personal information that is collected and held by NorthWest. If at any time you would like to access or correct the personal information that NorthWest holds about you, or you would like more information on NorthWest's approach to privacy, please contact NorthWest's Privacy Compliance Officer on the details set out in paragraph 11 below. NorthWest will grant access to the extent required or authorised by the Privacy Act or other law and take steps reasonable in the circumstances to correct personal information where necessary and appropriate.

Where necessary to resolve a request for correction of your credit related personal information, NorthWest may also consult with other relevant entities, including but not limited to Dun & Bradstreet. NorthWest's use or disclosure of your credit related personal information for correction purposes is permitted by the Privacy Act.

To obtain access to your personal information:

- you will have to provide proof of identity to ensure that personal information is provided only to the correct individuals and that the privacy of others is protected;
- NorthWest requests that you be reasonably specific about the information you require; and
- NorthWest may charge you a reasonable administration fee, which reflects the cost to NorthWest, for providing access in accordance with your request.

Alternatively, if you would like to access personal information held about you by Dun & Bradstreet, please contact Dunn & Bradstreet on the contact details set out in paragraph 2 above.

NorthWest will endeavour to respond to your request to access or correct your personal information within 30 days from your request. If NorthWest refuses your request to access or correct your personal information, NorthWest will provide you with written reasons for the refusal and details of complaint mechanisms. NorthWest will also take steps reasonable in the circumstance to provide you with access in a manner that meets your needs and the needs of NorthWest.

If you are dissatisfied with NorthWest's refusal to grant access to, or correct, your credit related personal information, you may make a complaint to the Office of the Australian Information Commissioner.

11 How to contact us

For further information or enquiries regarding your personal information, or if you would like to opt-out of receiving any promotional or marketing communications, please contact NorthWest's Privacy Compliance Officer at 03 8609 8410.

12 Privacy complaints

Please direct all privacy complaints to NorthWest's Privacy Compliance Officer. At all times, privacy complaints:

- will be treated seriously;
- will be dealt with promptly;
- will be dealt with in a confidential manner; and
- will not affect your existing obligations or affect the commercial arrangements between you and NorthWest.

Specifically, if your complaint relates to credit related personal information and/or NorthWest's failure to comply with its obligations regarding credit related personal information under the Privacy Act and/or the Credit Reporting Code:

- NorthWest will acknowledge your complaint within 7 days of receipt and endeavour to resolve it within 30 days, unless NorthWest informs you otherwise and seeks your agreement in writing;
- NorthWest may consult with relevant third parties, such as Dun & Bradstreet, to sufficiently and expeditiously resolve the complaint; and
- if your complaint relates to NorthWest's refusal to provide access to, or correct, your credit related personal information, you may complain directly to the Office of the Australian Information Commissioner.

NorthWest's Privacy Compliance Officer will commence an investigation into your complaint. You will be informed of the outcome of your complaint following completion of the investigation. If you are dissatisfied with the outcome of your complaint, or an extension to the time in which NorthWest will resolve it, you may refer the complaint to the Office of the Australian Information Commissioner.