
PRIVACY COMMITMENT

The Ingenia Communities Group ("**Ingenia**", "**us**" or "**we**") comprises Ingenia Communities Holdings Limited, Ingenia Communities Management Trust, Ingenia Communities Fund, and Ingenia Communities RE Limited.

Ingenia is a leading owner, operator and developer of a diversified portfolio of seniors housing accommodation and holiday accommodation. Ingenia has assets across Australia branded as Ingenia Lifestyle, Ingenia Gardens, Ingenia Rentals and Ingenia Holidays. Seniors residents may also from time to time receive assistance to access care services.

Ingenia is committed to protecting the privacy of all personal information that it handles or processes and is bound by the Australian Privacy Principles under the Privacy Act 1988 (Cth) and other privacy laws which govern the way in which organisations hold, collect, use and disclose personal information. This Privacy Policy describes how Ingenia collects, holds and discloses personal information.

SCOPE & APPLICATION

This policy applies to all personal information provided to Ingenia. This includes personal information of existing and prospective customers (including holiday guests, residents, and tenants) and existing and prospective suppliers. It also applies to prospective employees who may provide Ingenia with personal information in relation to potential employment.

Employment-related personal information of individuals employed by Ingenia may form employee records, and as such may be dealt with separately by Ingenia and may not be subject to this policy. Ingenia employees with queries about their employee records should contact Ingenia's People and Culture team.

WHAT PERSONAL INFORMATION DOES INGENIA COLLECT?

Ingenia will only collect personal information (including, in some instances, sensitive information) that is reasonably necessary for Ingenia's functions or activities, including to provide our services and to operate and manage our business.

The personal (or sensitive) information that is collected, held and used by Ingenia will depend on the nature of your relationship with us and may include (but is not limited to):

- Personal identification and contact details (including name, email address and telephone number)
- Financial information, including pension and payment and credit card details
- Tax file and Medicare numbers
- Bank account details
- Health information such as private health care provider details (from residents receiving assistance to access care)
- Next of Kin (NoK) and power of attorney details (from residents)
- Information provided in surveys, feedback, complaints and incidents
- Social media account names or tags (where you have engaged with us on social media platforms)
- Images from video surveillance via CCTV in our parks and communities

If you are applying for employment with Ingenia, we may also collect your resume, qualifications, skills, education

history, residency status, previous employment history and criminal history information.

If Ingenia receives unsolicited personal information, we will determine whether the information could have been collected in accordance with the Australian Privacy Principles. If the information is not reasonably necessary for our functions or activities, we will destroy or de-identify the information as soon as practicable, where lawful to do so.

If you fail to provide personal information requested by us, or if the personal information you supply is incorrect or incomplete, there may be a range of consequences, for example we may be unable to provide you with our services.

HOW IS THE INFORMATION COLLECTED?

We may collect personal information about you during the course of your dealings with us. For example:

- if you use our website, including to make bookings or enquiries
- completing application forms when you arrange to receive services from us, including online, by email or phone, or face to face
- while receiving services or care from us
- via care assistance documentation, if you are a resident receiving care
- during interviews, if you are applying to work with us
- if you enter into a competition we run subscribe to receive a newsletter or promotional material
- if you contact us via telephone or email with queries or to discuss services
- through security cameras and any other cameras that may be used in our parks and communities
- when undertaking any of our induction, safety or compliance processes

In most cases, and where possible, personal information is collected directly from you. If this is not practical, the information may be obtained from another person or entity, for example, from:

- medical practitioners;
- family members or carers; or
- previous employers, where you are applying for a job with us.

If you provide us with personal information about a third party, you represent, and we collect it on the basis that, you have that person's consent for us to collect and handle their personal information in accordance with this privacy policy.

From time to time, you may have the option to deal with us on an anonymous basis or by using a pseudonym. However, if the personal information you provide us is incomplete or inaccurate, or you withhold personal information, we may not be able to provide the products or services you are seeking or deal with you effectively, or we may need to request that personal information at a later time.

Additional privacy measures are employed to protect sensitive information (such as health information, racial or ethnic origin, religious beliefs, sexual preferences, and criminal history). Where we do collect sensitive information, we will only do so with your consent unless an exception applies under the Privacy Act, including where collection is required or authorised by law.

PURPOSE OF COLLECTION – HOW DO WE USE YOUR PERSONAL INFORMATION?

We will generally only use your personal information for the purpose for which we collected it, or for related purposes we consider would be within your reasonable expectations. If you do not provide your personal information to us we may be unable to fulfil one or more of these purposes.

GENERAL USES

Generally, we may use your personal information for purposes that include the following:

- to provide products or services to you, and to manage our relationship with you;
- administer our dealings and potential dealings with suppliers of products and services;
- to provide information that you request, and to respond to your enquiries,
- to manage any complaints;
- to handle payments for services purchased by you;
- to verify your identity, if necessary;
- for marketing research and marketing purposes (see further below), and for improving our services;
- enable us to manage our internal business affairs, for example, quality assurance, risk management, billing and administrative purposes;
- for our general business operations (for example, maintenance of our business records, compliance with our legal and insurance obligations and statistical purposes);
- in the case of CCTV, to assist us in ensuring security, health, wellbeing and safety for our residents, guests and staff in our parks and communities
- if you are a job applicant, to assess your suitability to work with us

SPECIFIC USES

Depending on our relationship with you, we may use your personal information ‘as following’:

INVESTORS

Personal information is collected from investors to allow Ingenia (or an external service provider) to process applications and to administer and report on investments.

TENANTS

Collection of personal information from a tenant in an Ingenia community allows Ingenia to make decisions on suitability of tenants for the community, leasing arrangements, collect rent, communicate with tenants as well as complete other associated documents.

RESIDENTS

Collection of personal or sensitive information including information about the health and wellbeing of a resident receiving assistance to access care services is necessary to manage relationships with our care recipients. It also allows Ingenia to assist in facilitating the services required, to communicate with residents, notify them about additional services and to comply with applicable laws. The type of information collected will be dependent on the services that the recipient requests or requires.

We may also collect Next of Kin or emergency contact details for residents, including a contact's name, relationship and contact details, where it is reasonably necessary to support a resident's health safety and wellbeing.

This information will only ever be used to respond to an emergency or serious incident or where a resident cannot be contacted directly. It may be disclosed to emergency services or healthcare providers where necessary to protect life, health or safety.

SHORT TERM HOLIDAY GUESTS

Ingenia collects information such as contact details, credit card information and direct debit details from individuals renting cabins (or other accommodation) for short term holidays. This information assists Ingenia in managing holiday bookings, communicating with guests and collecting payments.

HOME PURCHASING AND SALES

Ingenia may collect information such as contact details, banking details and solicitor details from home purchasers in our land lease communities for use in preparing the contract for purchase and to manage the ongoing relationship with the resident. Ingenia may also collect contact details, bank details and solicitor details from home sellers in our land lease communities to manage the sale process.

PROSPECTIVE EMPLOYEES

Prospective employee information is used by Ingenia to consider the application for employment and manage the recruitment process. If a candidate is unsuccessful in obtaining a position with Ingenia, Ingenia will retain their application and personal information in accordance with this policy including background and reference checks to contact the candidate if a position becomes available in the future.

OTHER PURPOSES

Ingenia may also use personal information to:

- manage its business operations (including maintaining business records, billing, and complying with our insurance obligations) and help run the organisation
- assist with health, wellbeing and security of residents, guests and staff in our parks and communities
- comply with legislative and regulatory requirements (both in Australia and overseas)
- share information with law enforcement, regulators and government agencies including foreign government agencies, where required or authorised by law
- to prevent, and investigate suspicious, fraudulent or criminal activities; and

- answer questions and resolve your complaints.

USE FOR MARKETING PURPOSES

Ingenia may use your personal information for various marketing-related purposes. These include:

WEBSITE IMPROVEMENT

Where Ingenia personalises its websites for ease of customer use, to improve customer experience and generate more bookings or sales/marketing leads to the business. This does not involve disclosure of personal information to any other person (except perhaps service providers e.g. contracted website developers).

INSIGHTS AND ANALYSIS

Where Ingenia uses personal information to analyse data and gain insights to improve its advertising and marketing strategy – to understand how to better improve customer experience and sell other offerings to them, analyse revenue attribution/customer behaviour, and to improve marketing effectiveness. This does not involve disclosure of personal information to any other person (except perhaps Ingenia's contracted service providers).

DIRECT MARKETING (SMS AND EMAIL COMMUNICATIONS)

Where you subscribe to Ingenia's mailing lists, or otherwise request it, Ingenia may use your contact information to send you direct marketing, being emails or SMS, with promotional offers, updates, advertising etc.

The communications may relate to updates on our products and services, to market other products that it may offer, or to provide information about new products or services and updates on developments within the business. We may also provide you with information relating to events or special programs or offers you might find of interest.

We will only send you direct marketing where we have your consent. If you no longer wish to receive direct marketing from us you may unsubscribe by using the unsubscribe function included as part of the communication, or by contacting us at **1300 536 509** or via the relevant email below:

- Ingenia Holidays: marketing@ingeniaholidays.com.au
- Ingenia Lifestyle: marketing@ingenialifestyle.com.au
- Ingenia Gardens: marketing@ingeniagardens.com.au
- Ingenia Rental: marketing@ingeniarental.com.au

DIGITAL ADVERTISING

Where permitted by law, Ingenia may use personal information such as your email address to promote Ingenia's products and services through digital advertising platforms, including social media platforms and Google.

This may involve disclosing limited personal information (including encrypted and hashed contact details such as email address) to those providers so that they can:

- Match Ingenia's information with information they hold to deliver relevant advertising to you;
- Identify audiences with similar characteristics (including through 'lookalike' or similar audience analysis); and

- Provide aggregated reporting and analytics to assist Ingenia to understand the effectiveness of its advertising activities.

These providers must use and handle personal information in accordance with their own privacy policy.

Ingenia will only use and disclose personal information for these purposes where it is permitted by privacy laws and where reasonably necessary for Ingenia's functions or activities. Ingenia takes all reasonable steps to ensure that third party providers handle personal information in accordance with contractual obligations and applicable privacy requirements.

You can manage your advertising preferences through the settings available on the relevant advertising platform. You may also contact Ingenia to object to the use of your personal information for direct marketing purposes or to withdraw any consent previously provided where applicable.

THIRD PARTY SHARING

Third party sharing is where Ingenia may disclose your personal information to third parties so that those third parties may personalise their own advertising and websites. The third parties may be content partners, media partners, strategic partnerships and other brands owned or managed by Ingenia Communities.

DISCLOSURE OF PERSONAL INFORMATION

We may disclose your personal information (including, in some instances, your sensitive information) with third parties if required in connection with the conduct of our business. Personal information is not disclosed to any other person except in the following circumstances:

During general business practice Ingenia may engage third party service providers, for example:

- Unit registry
- Custodial services
- Suppliers of care services provided to residents
- For the marketing-related purposes described above, including to advertising platforms, marketing and advertising service providers, content partners, media partners, and strategic partnerships
- During the recruitment process to contact referees and undertake background checks as well as any third-party service providers as may be necessary to progress an application.
- To any third parties involved in a resident's ongoing healthcare (such as general practitioner, specialist or carer)
- To organisations with whom Ingenia has contracted to assist in providing services required by Ingenia, such as:
 - Professional advisers, insurers, legal advisers, accounting service providers, auditors
 - Data management and storage providers, mail service providers, survey service providers
- To anyone or any entity Ingenia is required or permitted by law to disclose personal information to (including the courts or enforcement agencies)
- To police and law enforcement agencies where Ingenia requires a criminal history check

For investors, Ingenia may disclose personal information about you to external service providers to process applications and to administer and report on investments. We may also provide investors' personal information

to the registry. If you are an investor and wish to find out how the registry handles your information, please contact them at: MUFG Corporate Markets, Locked Bag A14 Sydney South NSW 1235 Telephone: 1300 554 474 (toll free within Australia).

OVERSEAS DISCLOSURE

In some circumstances, the organisations to whom we may disclose your personal information may be located outside Australia (for example, cloud hosting, technology or digital service providers). Where this occurs, Ingenia takes reasonable steps to ensure that those recipients handle the information in a manner consistent with the Australian Privacy Principles or are otherwise subject to substantially similar privacy obligations.

Other than as described above, Ingenia is not likely to disclose any of your personal information to overseas recipients.

COOKIES

A 'cookie' is a small data file placed on a computer or device which lets Ingenia identify and interact more effectively with your computer. Cookies do not identify an individual, but they do identify your web requests, ISP (which can be used to locate your general location), browser type, browser language and the date and time of your request, number of hits, pages visited and length of user session. They allow Ingenia to identify usage patterns, including date and time of day you access our website and provide you with a better browsing experience.

Apart from the IP address of the computer you may be using, Ingenia does not use cookies to collect any personal information such as name and email address.

If you prefer not to have cookies collected, you can disable this option in your browser settings.

STORAGE AND SECURITY

We may store your personal information in hard copy document or electronic form. At all times Ingenia will take reasonable steps to ensure that the personal information collected and held is protected from loss, or unauthorised use, access, modification or disclosure.

Personal information (both electronic and hard copy) is also protected via a range of measures including but not limited to:

- Access to information systems is controlled via access management procedures.
- Company policies and procedures regarding keeping information secure which all employees are bound by.
- All employees are required to complete training on information security and privacy as required.

Ingenia regularly reviews and monitors compliance with policies and best practice.

There are however inherent risks in transmitting information across the internet, and we cannot guarantee that any information you transmit to us over the internet is 100% secure (including personal information provided to us via our websites, via online services or via email).

In relation to electronic information, Ingenia takes all reasonable steps to manage data stored to ensure data security. We may store some personal information with third-party data storage providers, who also employ security measures to protect your personal information.

RETENTION AND DESTRUCTION OF PERSONAL INFORMATION

We will take reasonable steps to destroy or permanently de-identify your personal information when we no longer require it for any purpose for which it was collected. We may retain your personal information for as long as necessary to comply with any applicable law, for insurance and corporate governance purposes, for the prevention of fraud and to resolve disputes. Your personal information may also be retained in our information technology system back-up records.

DATA BREACHES

If a privacy breach does occur, Ingenia will respond to reduce the risk of damage in accordance with the Notifiable Data Breach Scheme under the Privacy Act, including any mandatory data breach reporting requirements.

Please contact us if you have reason to believe or suspect that a data breach may have occurred, so that we can investigate and, if necessary, undertake appropriate containment, risk mitigation and notification activities as required.

ACCESS AND CORRECTION

Please notify us if your personal details change so that we may keep our records current.

You have the right to seek access to and/or correct the personal information Ingenia holds about you if you believe it to be inaccurate, incomplete, out of date or misleading.

Generally, we will provide you with access, except where the law permits us to deny access. In those circumstances, we will provide you with written responses for refusal (unless it is unreasonable to do so).

You can make a request by contacting Ingenia's Privacy Officer in writing (contact details listed below). We will respond to the request within a reasonable period and will give access to the information in the manner requested if it is reasonable and practicable to do so. We will seek to verify your identity before we provide access or make any changes to your personal information.

We will consider all other questions or requests and provide a response within a reasonable period.

CONTACT US

If you wish to correct or request to access to your personal information, if you have a question or wish to raise a concern about the treatment of your personal information, or if you have a complaint, you should contact Ingenia's Privacy Officer at:

Privacy Officer
Ingenia Communities
Level 10, 20 Bond Street,
Sydney NSW 2000
Telephone: 1300 536 509

Email: privacy@ingeniacommunities.com.au

We will acknowledge all privacy complaints as soon as practicable and will investigate and respond within 30 days where possible.

COMPLAINTS RESOLUTION

If you feel that an issue or complaint remains unresolved or if you want further investigation to take place, you can refer your complaint to the Australian Information Commissioner (the OAIC). The OAIC can be contacted at:

Website: www.oaic.gov.au

Email: enquiries@oaic.gov.au

Telephone: 1300 363 992

REVIEW AND AMENDMENT

Ingenia will review this policy from time to time and may make changes to reflect Ingenia's current business practices and any changes in the law. If changes are made to this policy, the updated version will be available on our website.

Any queries or questions regarding this policy can be directed to the Group Risk & Compliance Manager.