

# Privacy Policy

## FOR M/GROUP AND ITS RELATED COMPANIES



This is the Privacy Policy for M/Group, an established integrated property group focused on investment, development, construction and real estate services.

M/Group includes the following companies:

1. M Funds Limited ACN 165 708 716, the holder of Australian financial services (AFS) licence number 447094.
2. M Capital Management Limited ACN 098 020 734, the holder of AFS licence number 280420.
3. M Finance (WA) Pty Ltd ACN 138 828 823, the holder of Australian credit licence number 387044.
4. M Construction (WA) Pty Ltd ACN 140 974 787.
5. M Property Pty Ltd ACN 097 138 764.

This Privacy Policy applies to the M/Group companies described above, as well as their related companies, and applies to each of them both in their personal capacity and in their capacity as trustee or responsible entity of any managed investment schemes operated by them from time to time.

In this Privacy Policy, a reference to M/Group or “we”, “us” or “our” is a reference to any one or more members of M/Group, including in their various capacities.

### **About this Privacy Policy**

We respect your privacy and we are committed to managing your personal information responsibly and in accordance with our legal obligations under the Privacy Act 1988 (Privacy Act).

M/Group collects, holds, uses and discloses personal information of individuals in the course of performing its functions and activities and in providing its products and services. The type and purpose for which information may be collected by us will depend on your relationship with M/Group and the circumstances in which the information is provided, such as whether you are a prospective or actual employee of M/Group, a recipient of property, credit or financial services, or otherwise.

The Privacy Act regulates the way we collect, hold, use and disclose personal information. This Privacy Policy contains information on the management of personal information by M/Group, including how we collect, hold, use and disclose personal information, and the purposes for which we do so.

If you provide us with your personal information, then you agree to your information being managed by us in accordance with this Privacy Policy.

### **Anonymity**

You are not required to provide us with your personal information when dealing with us. When dealing with us, you have the option of not identifying yourself or using a pseudonym. However, if you do not identify yourself to us, then we may not be able to provide you with our products or services.

### **Changes to our Privacy Policy**

We may update and revise this Privacy Policy from time to time. The current version of our Privacy Policy can be accessed free of charge on our website, <https://www.mgroup.com.au/privacy-terms/> or by contacting the Privacy Officer using the details set out at the end of this document.



### What kind of personal information do we collect and hold?

The type of personal information we will collect and hold will depend on your relationship with M/Group. The personal information we may collect and hold may include the following:

1. Your full name, date of birth, contact and other details (including your residential address, e-mail address, and fax and telephone number).
2. Information and/or documentation to verify your identity for the purposes of the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (AML/CTF Act) and/or other legislation and regulations regarding identification verification, and tax reporting and withholding.
3. Information and/or documentation to support you qualifying as a "wholesale client" within the meaning of Chapter 7 of the Corporations Act 2001.
4. Your tax file number (as authorised under the tax laws and the Privacy Act) and bank account details for the purpose of administering investor accounts and tax reporting and withholding.
5. Your bank account details.
6. Information to allow us to evaluate whether to, and if we determined to do so, grant a lease or enter into agreements with you, and to manage our relationship with you as a tenant, including your rental history.
7. Credit information, being information which is used to assess your eligibility to be provided with finance and may include any finance that you have outstanding, your repayment history in respect of those loans, and any defaults as well as information on the ages and number of your dependents and cohabitants, the length of time at your current address, your employment details and proof of earnings and expenses, among other things.

### How do we collect your personal information?

Unless it is unreasonable or impractical for us to do so, we will collect your personal information from you directly, including—

1. from you filling out application forms, such as an application form completed by you to acquire a financial product or receive other financial services from us
2. through your use of our website (<https://www.mgroup.com.au/>), or any internal website or intranet, as well as any M/Group website or social media page (collectively, "Website")
3. from communications between you and our officers, employees and representatives (including communications conducted in person, over the phone, by email or otherwise), and
4. from promotional and marketing activities undertaken by us, in which we request or otherwise receive personal information from you (such as from competitions organised by us).

However, we may also collect information about you from third parties, such as—

1. your financial or other professional advisor or broker
2. your authorised representatives, such as executors or administrators
3. your referees, recruitment consultants, previous employers and others who may be able to provide information to assist in our decision as to whether or not to make you an offer of employment
4. outsourced service providers or contractors, and
5. other third parties you have authorised to provide your personal information.



### How do we hold your personal information?

All personal information we collect will be held securely and in accordance with this Privacy Policy.

Generally personal information is stored electronically with hard copy records retained and stored securely. We will protect your personal information and prevent unauthorised access through the use of secure passwords, user logins, or other security procedures, including firewalls and anti-virus technology. All external service providers engaged by M/Group are required to hold personal information in accordance with the Privacy Act.

However, we cannot provide any assurance regarding the security of information transmitted to us online, as the internet is inherently insecure. Nor can we guarantee the supply of information to us from you will not be intercepted. Information you transmit to us online is at your own risk.

Part IIIC of the Privacy Act established the Notifiable Data Breaches Scheme (NDB Scheme) in Australia. The NDB Scheme sets out obligations for notifying affected individuals and the Australian Information Commissioner (Commissioner) about a data breach which is likely to result in serious harm. Where serious harm to affected individuals is likely, we will notify those individuals and the Commissioner in accordance with our legal obligations. You may contact our Privacy Officer using the details set out below should you require additional information.

### For what purposes does M/Group collect, hold, use and disclose personal information?

The purposes for which we will collect, hold, use and disclose personal information from you will depend on your relationship with M/Group. M/Group primarily collects, holds, uses, and discloses personal information to—

1. to carry on our business and to provide our products and services
2. to assess your application and establish and administer your investment
3. to verify your identity before transactions are processed, your instructions are carried out, or providing you with information about your investment, including as required to comply with our obligations under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (AML/CTF Act) and other legislation and regulations regarding identification verification, and tax reporting and withholding
4. to provide you with information about other products or services offered by M/Group
5. to maintain our relationship with you, including to respond to your enquiries or complaints and provide you with requested information
6. to assist with the administrative, marketing (including direct marketing), planning, product or service development, quality control or research purposes of us and our contractors and service providers, and
7. to provide you with credit assistance, including to provide you with information about loan products or related services and products and considering your eligibility for a loan or any related service
8. to assist in determining whether to make you an offer of employment or engage you under a contract, and to manage your employment or contractual arrangement on an ongoing basis
9. to evaluate whether to grant a lease or enter into agreements with you, and if you are a tenant, to manage the tenancy, maintain contact details and records, respond to queries or complaints, process transactions and for security and risk management purposes including incident investigation, loss prevention, claims management and litigation and to comply with any law or regulation.
10. to prepare internal reporting that includes identifiable customer information (e.g. customer sales or marketing information, complaints or issues reporting, registry operations reporting) to satisfy any legal requirements.



### Disclosure of personal information

Personal information held by M/Group may be disclosed to other M/Group entities for the purposes described above, as well as to third parties, depending on the nature of your relationship with M/Group. Personal information may be disclosed to—

1. outsourced service providers and organisations involved in the provision of, management or administration of our products or services (such as custodians, registries, administrators, mail houses and information technology providers)
2. financial institutions, funders or other intermediaries or credit providers for the provision of credit products such as mortgages, as well as to other organisations that are involved in managing or administering your finance
3. auditors, consultants and other professional advisors (including accountants and lawyers)
4. printers and mailing houses, information technology systems software providers, actuaries, and research organisations
5. government agencies and regulatory bodies, such as the Australian Securities and investments Commission, the Australian Taxation Office, and the Australian Transaction Reports and Analysis Centre
6. financial services intermediaries, such as financial planners, and
7. other third parties you have authorised to receive your personal information.

Prior to disclosing any of your personal information to another person or organisation, we will take all reasonable steps to satisfy ourselves that the person or organisation has a commitment to protecting your personal information at least equal to our commitment, or that you have consented to us making the disclosure.

Where M/Group contracts with an outsourced service provider, we take reasonable steps to protect the privacy of any information disclosed to them, including by requiring them to comply with the Privacy Act.

### Are we likely to disclose your personal information to overseas recipients?

We will not disclose your personal information to overseas recipients, unless required to by law.

### Credit Reporting Information

We may, on your authority, request a credit report from one of the credit reporting agencies on your behalf. Credit reports provide information on your previous credit history and may prove useful in determining the lender more suited to your circumstances. A credit report gives us information about your credit history. Credit reports are provided by credit reporting bodies who collect and share credit information with credit providers and other service businesses like phone companies. The Privacy Act limits the information we can give to credit reporting bodies, and that they can give us.

We use information from credit reporting bodies to confirm your identity, assess your ability to manage credit, and manage our relationship with you. A copy of the credit report will be made available on your request.



### Use of our Website

We may use “cookies” to help us tailor our Website to better suit your needs and improve our service. Cookies are small text files that are stored in your computer’s memory and hard drive when you visit certain web pages. Cookies are used to enable websites to function or to provide information to the owners of a website.

You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of the Website.

We use cookies on the Website for the following purposes:

1. *Analytical purposes*—Analytical cookies allow us to recognise, measure and track visitors to the website. This helps us to improve and develop the way the website works, for example, by determining whether site visitors can find information easily, or by identifying the aspects of the site that are of the most interest to them.

The Website uses Google Analytics, a service which transmits website traffic data to Google servers in the United States. Google Analytics does not identify individual users or associate your IP address with any other data held by Google. We use reports provided by Google Analytics to help us understand website traffic and webpage usage.

2. *Usage preferences*—Some of the cookies on the Website are activated when visitors to our sites make a choice about their usage of the site. The Website then ‘remembers’ the settings preferences of the user concerned. This allows us to tailor aspects of the site to the individual user.
3. *Terms and conditions*—We use cookies on the Website to record when a site visitor has seen a policy, such as this one, or provided consent, such as consent to the terms and conditions on the Website. This helps to improve the user’s experience of the site – for example, it avoids a user from repeatedly being asked to consent to the same terms.
4. *Session management*—The software that runs the Website uses cookies for technical purposes needed by the internal workings of our servers. For instance, we use cookies to distribute requests among multiple servers, authenticate users and determine what features of the site they can access, verify the origin of requests, keep track of information about a user’s session and determine which options or pages to display in order for the site to function.
5. *Functional purposes*—Functional purpose cookies store information that is needed by our applications to process and operate. For example, where transactions or requests within an application involve multiple workflow stages, cookies are used to store the information from each stage temporarily, in order to facilitate completion of the overall transaction or request.

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### Direct marketing

We may also send you direct marketing communications and information about any other products or services offered by us that we expect may be of interest to you. These communications may be sent in various forms, including mail, fax and email. At any time you may opt-out of receiving marketing communications from us by contacting the Privacy Officer using the details set out at the end of this document.

Please note that, if we are currently providing you with services or products, we will still need to send you essential information about your account, the relevant services or products and other information required by law.

We will not sell your personal information nor will we provide it to third parties except as described in this Privacy Policy.

### How you can access and correct your personal information held by us

You may request access to any of your personal information held by us. Your right to access is subject to some exceptions allowed by law. We will notify you of the basis for any denial of access to your personal information.

We will endeavour to ensure your personal information is kept accurate, complete, up to date and relevant. Please let us know if any of your details change. If you feel your personal information is not accurate, complete or up to date, then please notify us and we will take reasonable steps to ensure it is corrected.

We will consider if the information requires amendment. Generally, if the personal information held by us about you is incorrect, then we will correct it at your request. If we do not agree that there are grounds for amendment then we will add a note to the personal information stating that you disagree with it.

Please contact our Privacy Officer using the details at the end of this document to request access to or correct any of your personal information held by us.

### How can you complain about a breach of privacy?

If you have a complaint about a breach of this Privacy Policy including the manner in which we have collected, held, used or disclosed your personal information, then you may make a complaint to us using the contact details set out at the end of this document. You will need to provide us with sufficient details regarding your complaint and any supporting evidence.

Your complaint will be referred to our Privacy Officer who will investigate the issue and determine the steps we will take to resolve your complaint. We may ask you to provide additional information.

We will notify you in writing of our determination, generally within 30 days. If you are not satisfied with our determination or you do not receive a response within 30 days, then you can contact us to discuss your concerns and you can refer the complaint to the Office of the Australian Information Commissioner [www.oaic.gov.au](http://www.oaic.gov.au)

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## Request a copy of this Privacy Policy and further information

A copy of our current Privacy Policy is available from us free of charge from our website, <https://www.mgroup.com.au/privacy-terms/>. You can also request a copy of the Privacy Policy to be sent to you. If you would like a copy of this Privacy Policy in a particular form, then please contact us and we will accommodate any reasonable request.

## Contact us

If you have any further questions relating to this Privacy Policy, would like to request a copy of our Privacy Policy, or if you have any concerns about the way in which we have handled your personal information, then please contact our Privacy Officer as follows:

- a. by email [info@mgroup.com.au](mailto:info@mgroup.com.au) attention: Privacy Officer
- b. by calling (08) 6380 0400 or (+61)8 6380 0400 for international callers, or
- c. by post to—

Privacy Officer  
M/Group  
234 Railway Parade  
West Leederville WA 6007