



IFM Group Clients/Prospective Clients/Investors/Borrowers Privacy Notice

IFM Investors Pty Ltd ("IFM Investors") and its subsidiaries, branches, local employing entities, associates, and affiliated companies (hereafter "IFM Group", "IFM", "us," "our", or "we") are committed to protecting and securing the privacy and confidentiality of the Personal Data¹ we collect about you during our business interactions. This includes information gathered directly through our services, communications, and transactions, as well as indirectly from third-party sources. This notice (the "Notice") outlines and explains how IFM will process² your Personal Data in accordance with applicable privacy legislation(s).

Contact details

IFM is the controller for the Personal Data we process unless otherwise stated.

You can contact us by either email or post.

Our postal address for Australia is:

Attn: Privacy Officer
Address: Level 33, 50 Lonsdale Street
Melbourne VIC 3000
Australia

The postal addresses for all IFM office locations can be found [here](#).

Alternatively, you can contact us via email at dataprotection@ifminvestors.com.

What does this Notice cover?

This Notice aims to provide clients/prospective clients/investors/borrowers (together "you") with information on what Personal Data we may collect and process about you, why and how we process your Personal Data, including details on the privacy principles we will abide by, and inform you of certain rights which you may be able to exercise on your Personal Data.

What Personal Data do we collect?

When you register with IFM as an individual or as an authorised representative to act on behalf of a prospective client or investor organisation (and depending on the relevant circumstances and applicable laws and requirements), we may collect some or all of the information listed below. This may include sensitive personal information (or 'special category Personal Data') that we may use with your consent; this type of data is *italicized* below:

Categories of Personal Data	Examples
Personal details	Full name; age/date of birth; gender; organisation; job title; marital status; nationality; mother's maiden name; <i>racial or ethnic origin; religious or philosophical belief; trade union membership; political opinion/affiliations</i> ; wet ink signatures; and any other information contained in the evidence of identity provided by you on your organisation's behalf or on your behalf.
Private Contact details	Home/Office postal address; email address; home/office telephone number (including mobile phone number); home facsimile number; and custodian/agent contact information.
Identification data	Photograph; a copy of your driver's licence and/or passport; authorised signatory lists; individual tax number or tax file number (or equivalent), and

¹ 'Personal Data' means any information about you from which you can be identified (whether derived from that information on its own or when combined with other information that we or another party may hold about you).

² Processing means any activity or set of activities which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.



	any other tax-related information; information we obtain from background verification checks for clients and their directorship information (if applicable), including information relating to criminal convictions and offences.
Financial related data	Financial Information and Relationships; credit/financial history; credit/debit card number; expiration date; CVV/CVV2; income/salary; beneficial ownership information; bank account details for individual investors; and government company registers.

In addition, we may collect personal information about you from related corporate bodies (including other IFM members, subsidiaries or affiliated companies), funds we manage or advise, service providers, business partners and government agencies. We may also collect Personal Data about you in the course of providing our services under any IFM funds, such as information about individuals who are authorised to act on behalf of you.

How do we collect your Personal Data?

We may collect your Personal Data primarily through direct interactions with you, such as when you register yourself or provide information during onboarding, including when inquiring about, applying for, using, or otherwise engaging in our products or services or conducting business with us. Additionally, we may gather data from third parties, including representatives, authorised organisations and government agencies, as part of financial and background checks, etc.

How we use your Personal Data?

We may collect and use your Personal Data for the purposes including, but not limited to, as set out below:

- a) managing the registration or onboarding and providing you with the information you request;
- b) providing advice and related products and services to you (including carrying out diligence and administrative tasks prior to the provision of the services, such as undertaking know your client checks and requirements);
- c) receiving products and services from our suppliers in order to carry out our business mentioned in the preceding items;
- d) to comply, or for our affiliates (including other IFM members and subsidiaries) to comply, with applicable legal or regulatory requirements e.g. (i) client or counterparty identification for the purposes of meeting anti-money laundering obligations, or (ii) authorised signatory verification to meet our obligations on preventing financial crime;
- e) administrative activities, financial accounting and risk analysis;
- f) to correspond with you (including with Generative Artificial Intelligence), for example, using your data to monitor your interactions with us so we can seek to improve the service or to inform you about related products or services you may be interested in and bring to your attention, to manage our relationship with you, and to provide you with investor surveys;
- g) to uphold our company's economic interests and ensuring compliance and reporting (such as adhering to our policies and local legislation and managing allegations of fraud or misconduct);
- h) to make decisions relating to investigations and other disciplinary action;
- i) for data matching, for example matching your Personal Data available publicly and the Personal Data collected & processed by IFM to engage with you; and
- j) to manage conflicts of interest.

Why we process your Personal Data?

We process your Personal Data for specified purposes and on the following legal grounds for the various situations which may arise with us:

- When processing your Personal Data, we are relying on the legal basis that processing your Personal Data is within our legitimate interests in pursuing the purposes set out in (a) to (g) above (where such



interests does not override your interests or fundamental rights or freedoms); namely to:

- manage conflicts of interest;
- enforce our legal rights or establish, exercise and defend claims; and
- run our business in accordance with industry best practices and expectations.
- We may rely on the legal basis that processing is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract.
- When processing your Personal Data, we also rely on the legal basis that the processing is necessary for us to carry out our legal obligations.
- When processing your Personal Data, we may also rely on consent as the legal basis that the processing is necessary for us to carry out our business functions.

With whom we share/disclose your Personal Data

We may share/disclose your Personal Data with any of the following parties:

- **IFM:** We may share your Personal Data in certain circumstances with the other companies across the IFM Group (including general partners, trustees, subsidiaries and related body corporates) or funds or managed accounts managed or advised by us.
- **Our service providers:** We may share Personal Data with our service providers who assist us in performing our functions and services. These service providers may include organisations that provide insurance and insurance broking, personnel, archival, mail and delivery, auditing, professional advisory (financial, legal, tax and management consulting), banking, security or technology services that may also support Generative Artificial Intelligence.
- **Regulators or other authorities:** We may share your information in order to comply with our legal and regulatory obligations, such as regulators or tax authorities, when, in our reasonable opinion, the law or other regulation requires us to share this data (for example, because of our obligations to tax authorities). We may also share your Personal Data where we think this is necessary, for example, to meet our legitimate interests and protect our business, including from fraud and legal claims.
- **Other parties as part of a corporate transaction:** We may share your information with prospective purchasers and their advisers when we are discussing selling or transferring part, or all, of an IFM entity to them, but only so they can evaluate the relevant business. If we are restructured or sold to another organisation, we may transfer information we hold about you to them so they can continue to provide services to you.

Is your Personal Data transferred across international borders?

We may transfer your Personal Data to IFM offices and authorised third parties located outside of your country and take organisational, contractual and legal measures to ensure that your Personal Data are exclusively processed for the purposes mentioned above and that adequate levels of protection have been implemented to safeguard your Personal Data. These transfers will be undertaken in compliance with applicable law(s) and regulation(s).

If it is necessary to transfer your Personal Data from your habitual place of residence to countries that do not offer adequate protections, then we will ensure that appropriate safeguards, as required by applicable laws, are put in place prior to the transfer of the data for example, incorporating standard contractual clauses or data transfer agreement(s) established between the parties transferring the Personal Data. Further details of these transfers are available from us on request.

How long do we retain your Personal Data?

We will take reasonable steps to keep your Personal Data for no longer than is necessary for the purposes for which we collected it, subject to any legal obligation to retain Personal Data for a prescribed period of time. as specified in our Records Retention Schedule.



When determining the length of time, we take into account factors such as our legal or regulatory responsibilities, including complying with any required retention periods and limitation periods relevant to legal action. In some cases, Personal Data may be held for (a) a longer period of time where there is a legal or regulatory reason to do so (in which case it will be deleted once no longer required for the legal or regulatory purpose) or (b) a shorter period where the individual objects to the processing of their Personal Data and there is no longer a legitimate business purpose to retain it.

How do we safeguard your Personal Data?

We implement and maintain appropriate technical, organisational, and physical security measures to protect your Personal Data that aligns with key cyber security requirements from certain leading standards (such as the National Institute of Standards and Technology and the International Organisation for Standardization).

These may include, but are not limited to, the following:

- Access to Personal Data is based on the need-to-know and least privilege principle to ensure the Personal Data is only accessible to authorised individuals for the performance of their duties.
- Layered security controls ranging from perimeter security to end user machine level controls such as firewalls, spam protection, antivirus and spyware solutions, security awareness training, and incident management are applied.
- To further reduce the risk associated with processing the Personal Data, we make use of techniques to make your Personal Data anonymous where possible.
- We use encryption mechanisms, where appropriate, such as email encryption, encryption of Personal Data during transfer, secure VPN access, and disk level encryption.
- Third parties that process Personal Data on our behalf do so according to our written instructions. They are bound by confidentiality and must implement suitable technical and organisational measures to ensure the Personal Data is secured.

Direct marketing

We may use the Personal Data we collect to send you marketing communications about products, services, or offers that may interest you. You will have the option to opt in or opt out of receiving such communications. If you prefer not to receive direct marketing, you can unsubscribe at any time by following the instructions in the communication or contacting us directly.

What if you do not provide Personal Data?

Depending on the type of Personal Data in question and the grounds on which we may be processing it, should you decline to provide us with such Personal Data, we may not be able to fulfil our obligations as they relate to providing you with IFM products and services with respect to your contractual obligations.

Certain information may be necessary to fulfil legal obligations under business interactions and other applicable laws and regulations and exercise your statutory rights. If you do not provide the necessary information, this will impact our ability to communicate with you, or our ability to enter into a contract with you or continue to contract with a counterparty.

Your rights in relation to your Personal Data?

You have certain rights in relation to the Personal Data IFM holds about you. These rights vary depending on the country where you are based. Further information about your rights, and how you can exercise them, is provided in this [Addendum 1](#).



Who can you contact if you have a query, concern, or complaint about your Personal Data?

If you have any issues, queries or complaints regarding the processing of your Personal Data, please contact us at dataprotection@ifminvestors.com. For more details, please refer to the section 'Contact Details' above. If you are unsatisfied with the handling of your Personal Data by IFM, please refer to [Addendum 2](#) for the Country/State specific supervisory authority list.

Information about IFM's Privacy Statement is available [here](#).

How do we update this Notice?

This Privacy Notice was last updated on 11 April 2025.