



IFM Group Employee Privacy Notice

IFM Investors Pty Ltd ("IFM Investors") and its subsidiaries, local employing entities, associates, and affiliated companies (hereafter "IFM", "IFM Group", "us", "our", or "we") are committed to protecting and securing the privacy and confidentiality of your Personal Data¹, where IFM collects directly or indirectly from you or your delegate or any third party prior to, in the course of or after your employment/contract at IFM. 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 IFM global offices 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 employees and workers engaged under a contract for services ("contractors") (together "you") with information on what Personal Data we 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 in respect of your Personal Data.

What Personal Data do we collect?

Prior to starting work, during the course of, or after your employment with an IFM entity, depending on the relevant circumstances and applicable local 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 *italicised* below.

Categories of Personal Data	Examples
Personal details	Full name; age/date of birth; birth gender; marital status; staff number/other identifier; residency and work permit status; nationality/citizenship/place of birth; <i>racial or ethnic origin; health and disability-related information; trade union membership; political opinion/affiliations</i> ; spouse and dependant details, and next of kin and emergency contact details.
Private contact details	Address, email address and telephone number (including mobile phone number); and emergency contacts.
Identification data	Photograph; a copy of your driver's licence and/or passport/identity card and/or other identification documents (including copies of any visas); national insurance

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.



	number (or equivalent), individual tax number or tax file number (or equivalent), and any other tax-related information; and information we obtain from background verification checks, including information relating to criminal convictions and offences.
Your education and employment history	CV and covering letter; education details; employment history; qualifications; technical skills; professional certifications; records of reference checks; and records of work absences.
Information relating to your employment with the IFM	Start date; role and location of your employment or workplace; details about your remuneration, pension and benefits arrangements (including information on dependants and beneficiaries) and your bank details; flexible working agreements; details of any leave you take or request during our relationship, <i>or sickness absence including health-related information</i> ; details of your travels and expense claims; information about your performance; details of reviews held; details of any bonuses or promotions you receive and other information that relates to your employment; <i>details of any grievance or disciplinary matters, whether brought by or against you or in which you are otherwise involved (which may include sensitive personal information)</i> ; and details of termination or resignation.
Information relating to investments and directorships	Your shareholdings and directorships, including outside directorships; and details of your immediate family members' personal investments holdings and trading activity which you are required to disclose to us.
Automatically collected Personal Data	CCTV footage (in locations where applicable) and other information obtained through electronic means such as swipe card or site-access records; information about your use, activity and communications on/from IFM systems and devices, including the dates, times and frequency with which you access the internet, how you use the systems and internet in this way, including the websites you search for and visit and the content you view, and your communications which pass through IFM systems or devices, including emails, instant messages, text messages and app-based messages that you send and receive from your IFM email address. For employees or contractors in particular roles, calls/online meetings/teleconferences may be recorded for a number of reasons (such as quality assurance, training, compliance requirements).
Information relating to the protection of work products and other assets	Information collected during the course of your employment including: <ul style="list-style-type: none"> • emails, documents, and other work products and communications created, stored or transmitted using IFM applications, devices, computers or communications equipment; • log of all emails sent and received on IFM systems, including the name and email address of the sender and recipient(s), the date and time the email was sent, the subject of the email and size of the message; • telephone call logs from IFM office telephones, including numbers called/calling, time and duration of call; • recordings of telephone conversations between third parties and staff using specified telephones, where IFM has legal obligations to make such recordings; • information in relation to internet and email usage by employees of IFM; and • user ID, employee username, system access logs, IP address, browser type, operating system and cookies for certain systems.
Other	Extra information (without limitation) that you choose to tell or provide to us (<i>including sensitive personal information</i>), or your colleagues, referees, suppliers or professional advisers choose to tell us about you, or that we find from other third-party sources including social media platforms.

How do we collect your Personal Data?

We collect some of your Personal Data directly from you, for example, during recruitment and onboarding processes, in review meetings with your manager, and any other data you update on or input into IFM systems.

We also collect Personal Data about you from third parties including service providers, suppliers, professional advisors, your colleagues, medical professions (in appropriate and limited circumstances), your pension and benefits providers, your local tax authority or a regulator.



We may also collect your Personal Data automatically, such as the dates, times and frequency with which you access the internet using IFM systems or devices.

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 in the table below. The section above, titled 'How Do We Collect Your Personal Data?', sets out the details of the types of Personal Data we collect and process for these purposes.

Purpose
To facilitate our employment relationship
<ul style="list-style-type: none">• to determine the terms on which you work for us (including relocating to work in different jurisdictions);• to ensure the smooth running of our relationship with you, and that we can respond (including with Generative Artificial Intelligence) to any queries and contact you if you request us to do so;• to keep a record of when you work for us (including holidays requested or taken, and any other leaves of absence);• to facilitate our payroll and invoicing processes;• to provide benefits under the applicable contract with you (to ensure the contract can/is fulfilled);• payment of expenses incurred as part of your role (such as travel expenses);• keeping a record of any promotions, salary rises or bonuses you are awarded;• to assess your performance for promotion decisions;• to carry out performance reviews;• to store your details on our databases (and to update them as necessary);• carrying out re-screening during your employment to verify that you continue to meet the required standards of fitness and propriety for your function (where applicable) or to remain suitable for the role you perform;• to make decisions relating to your continued employment or engagement;• to make decisions relating to investigations and other disciplinary action; and• to manage reward and remuneration, including budget tracking, annual reviews and generating reports to finance and payroll.
Carrying out actions required of us by applicable law, including employment or diversity laws
<ul style="list-style-type: none">• to ensure that we provide appropriate adjustments to your working arrangements and workplace (with respect of any disability status or health conditions);• to ensure that we comply with requirements relating to equal opportunity monitoring and reporting;• to carry out any criminal record checks to the extent that this is required by local laws; and• to comply with any other applicable legal requirements under business, financial, health and safety, and employment legislation (for example detection of crime, and collection of taxes or duties).
Keeping the IFM secure, and protecting our employees, contractors and property
<ul style="list-style-type: none">• to intercept and monitor communications passing through IFM systems;• to manage office (including tools) access and security in line with the contractual and employment arrangements;• detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity;• via CCTV at our premises to ensure the safety and security of our employees, contractors, and property; and• to manage travel security to ensure safe and secure travelling under contractual agreements and roles.
To manage conflict of interests and comply with legal and regulatory obligations
<ul style="list-style-type: none">• to avoid actual or apparent conflicts of interest, and to ensure that IFM can comply with its regulatory obligations (including conduct rule breach management and reporting to regulators);• to record calls, online meetings, and teleconferences where required for particular roles.
To enforce our legal rights or establish, exercise and defend legal claims
<ul style="list-style-type: none">• to seek professional advice, including legal advice, or enforce your obligations or enforce our rights;• to help us establish, exercise or defend legal claims, including accidents at work; and• to prevent any individual from harm or engaging in illegal or unlawful activities.



Why we process your Personal Data?

1. We process your Personal Data for specified purposes and on the following legal grounds for the various situations which may arise during your employment 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 running our business and performing our role as your employer (where this interest 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 also rely on the legal basis that processing is necessary for the performance of our contract with you; and
 - When processing your Personal Data, we are relying on the legal basis that the processing is necessary for us to carry out our legal obligations; and
 - When processing your sensitive Personal Data, is necessary for us to exercise our rights or carry out our employment and social security law obligations.
2. In exceptional circumstances, you may request us to disclose your Personal Data to third parties or organisations, such as a law firm handling a claim on your behalf or otherwise.

With whom we share/disclose Your Personal Data

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

- **The IFM:** We may share your Personal Data in certain circumstances with other companies across the IFM Group or funds managed or advised by us.
- **Third party service providers, vendors and professional advisors:** We may share your Personal Data with third-party service providers who perform functions on our behalf (including benefits administration such as benefit platform providers, share plan administrators, insurers, private medical and dental providers, pension scheme administrators, external consultants, business associates, employee training providers, health and safety service providers, professional advisers such as lawyers, auditors, accountants, technical support functions, IT consultants carrying out testing and development work on our business technology systems, outsourced IT and document storage providers (including technology services that may also support Generative Artificial Intelligence, cloud service providers and providers of mobile applications), and other service providers who assist us in performing our functions and services (including banks, financial institutions, depositories, transfer agents, administrators, registrars, trustees, custodians and paying agents)).
- **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 where 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.

We may conduct background checks prior to you commencing employment with us. In order to do so, IFM may be required to share your Personal Data with the relevant third parties. These checks will be performed by our Personal Data Processors³, who will conduct background screening on our behalf.

³ A Personal Data Processor is an organisation or individual that processes Personal Data on behalf of and as defined by IFM. Processors are accountable to IFM and must assist in their data protection obligations.



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 is exclusively processed for the purposes mentioned above and that adequate levels of protection have been implemented in order 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 this 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. For example, we may need to retain certain of your Personal Data for purposes such as tax reporting, responding to tax queries (from HM Revenue and Customs or the relevant regulatory body) or potential litigation.

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 Standardisation).

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.

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 employment, tax, and other applicable laws and regulations with respect to your employment/contract. If you have concerns about providing certain data, please reach out to us to discuss potential alternatives.



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 list 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.