



IFM Group Business Ethics Contact Line Privacy Notice

IFM Investors Pty Ltd (“IFM Investors”) and its subsidiaries, branches, 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 Personal Data¹ that is collected from you or from another individual who uses the contact line to report & handle an ethical matter. 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 individuals (“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 you may be able to exercise on your Personal Data.

What Personal Data do we collect?

When you use the Business Ethics Contact Line, we may collect the following information about you either directly, or from another individual who uses the Contact Line to report a matter:

Categories of Personal Data	Examples
Personal details	Full name; email address; your role, and phone number.
Other details	Any Personal Data that you or another individual on your behalf provides through the Contact Line.

How do we collect your Personal Data?

We collect your Personal Data directly from you or from another individual, who uses the Contact Line to report a matter and provide information such as your name, contact details, and a description of the concern and related conduct being reported.

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.



How we use your Personal Data?

We may use your information for the following purposes:

- to provide and maintain the Contact Line;
- to investigate or respond (including with Generative Artificial Intelligence) to any incidents, complaints or grievances;
- to prepare reports (including with Generative Artificial Intelligence) on any incidents, complaints or grievances which are raised via the Contact Line;
- to facilitate our internal business administration, including maintaining proper business records; and
- to compile statistical data on the use of the Contact Line to report on the cross-section of people who use the Contact Line.

Why we process your Personal Data?

We process your Personal Data for specified purposes and on the following legal grounds for the various situations that may arise to address the matter or to provide assistance:

- When processing your Personal Data, we are relying on the legal basis that processing your Personal Data is within our legitimate interests³ in pursuing the purposes set out above (where such interests does not override your interests or fundamental rights or freedoms);
- When processing your Personal Data, we are relying on the legal basis that the processing is necessary for us to comply with security and legal obligations; and
- When processing your Personal Data, we also rely on the legal basis that processing your Personal Data is done with your consent.

Whom we share/disclose your Personal Data with?

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

- **IFM:** We may disclose your Personal Data across the IFM Group (including general partners, trustees, and subsidiaries), as required to investigate, report, and administer the Contact Line.
- **Our service providers:** We may share your personal data with third-party service providers who perform functions on our behalf (including website providers, telecommunications providers, email communications service providers and our Contact Line provider). We will only share your data with these third-party service providers where we have appropriate data processing agreements (or similar protections) in place. We may also 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 (including responding to an enquiry from a government agency), when, in our reasonable opinion, the law or other regulation requires us to share this data. 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.
- **Professional advisors and auditors:** We may disclose your Personal Data to professional advisors (such as legal advisors, accountants, or auditors) for the purpose of those advisors providing professional advice to us.

³ Legitimate interests can refer to situations where IFM has a valid reason to process the Personal Data, provided that this interest is not overridden by the rights of the Individual.



- **Other parties as part of a corporate transaction:** We may share your Personal Data 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.

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 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 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 align with cyber security requirements from certain leading standards (such as the National Institute of Standards and Technology and the International Organisation for Standardisation).

These 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 may use 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 data, we may not be able to fulfil our obligations as they relate to the processing of your inquiries, complaints, support requests, or other services we provide via the Contact Line. If you have concerns about providing certain data, please contact us⁴ to discuss if there are any potential alternative options which may be available.

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.

⁴ Please refer to section 'Contact Details' for ways to contact us.