

# **IFM Group Visitor 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 your Personal Data¹ that is collected from you/your delegate regarding your visit to IFM offices (or our premises or IFM offices). 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 information 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 visitors ("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 visit our premises, depending on the relevant circumstances and applicable local laws and requirements, we collect some or all of the information listed below.

Categories of Personal Data	Examples
Personal details	Full name; email address; mobile number; organisation name.
Other details	Purpose of visit; date of visit, time of visit and any other information which may be provided to facilitate your visit at one of our office locations.
CCTV footage	CCTV operates within IFM facilities. Your Personal Data may be collected in the form of footage or images recorded by video and camera surveillance systems.

#### How do we collect your Personal Data?

We collect your Personal Data directly from you or your delegate prior to your visit to our premises or when you arrive at our office, you may be required to sign in and provide information such as your full name, contact details, and the purpose of your visit.

#### How we use your Personal Data?

We may collect and use your Personal Data for the purposes including, but not limited to, the following:

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<sup>&</sup>lt;sup>1</sup> '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).

<sup>&</sup>lt;sup>2</sup> 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.



- To facilitate your entry and visit to the IFM office and issue visitor/access badges;
- For safety and security purposes;
- To maintain a record of visitors for emergency situations, enabling quicker response during evacuations or incidents; and
- To maintain a log of visitors for internal records, which may assist with auditing and security reviews.

## 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 during the visit to our office premises:

- 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 above (where such interests does
  not override your interests or fundamental rights or freedoms); namely to:
  - manage conflicts of interest;
  - o enforce our legal rights or establish, exercise and defend claims; and
  - o run our business in accordance with industry best practices and expectations.
- When processing your Personal Data, we also rely on the legal basis that the processing is necessary for us to comply with security and legal obligations.

#### 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 with applicable IFM employees, including the person you are visiting, the facility management team, and, if applicable, the IT team responsible for supporting visitor management applications.
- Our service providers: We may share your Personal Data with our service providers who assist us in
  performing our functions and services. These service providers may include organisations that provide
  IT services (such as visitor applications, SMS, and emails). We may disclose your Personal Data to Third
  Parties or organisations who assist us in managing visitor check-in processes, security services, or facility
  management.

#### 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 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,

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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 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, etc.
- 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 facilitating your access with respect to your visit to offices. If you have concerns about providing certain data, please reach out to us 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 <a href="mailto:dataprotection@ifminvestors.com">dataprotection@ifminvestors.com</a>. 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 <a href="mailto:Addendum 2">Addendum 2</a> 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.

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