

PRIVACY POLICY

PURPOSE

RMBL Investments Limited ACN 004 493 789 AFSL 223246 (**RMBL**) recognises the importance of protecting the privacy of individuals and is committed to handling Personal Information in accordance with the Privacy Act 1988 (Cth) (**Privacy Act**) and the Australian Privacy Principles (**APPs**).

Personal Information means information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not and whether it is recorded in a material form or not, as defined in the Privacy Act.

This Privacy Policy (**Policy**) describes how RMBL collects, holds, uses, discloses and otherwise manages Personal Information in connection with its investment and lending services that we collect both through:

- our website (**Site**), the software applications made available by us for use on or through computers and mobile devices (**Applications**), our social media pages (**Social Media Pages**) (Site, Applications and Social Media Pages collectively referred to as **RMBL Online Services**); and
- other means (for example, from your investment and loan application forms, redemption, transfer and loan discharge forms, telephone calls, emails, correspondence and other communications with us or other third parties involved in providing our financial products and services, which may be electronic or physical records), collectively referred to as **Client Documents**.

When you provide us with Personal Information, you acknowledge and consent that your Personal Information will be collected, held, used, and disclosed in accordance with this Policy, as amended from time to time, and with the Privacy Act.

By accessing or using RMBL Online Services or providing us with Client Documents, you acknowledge that you have read and understood this Policy and agree to the collection, handling and disclosure of your Personal Information as described in this Policy.

PERSONAL INFORMATION THAT WE COLLECT

The types of Personal Information we collect about you depend on the nature of your relationship and interactions with us, including whether you are an investor, borrower, guarantor, authorised representative, external service provider, prospective customer, Employee¹, contractor, agent, or other representative.

Personal Information collected about you may include:

- **General identification and contact information**

Your name; address; email; signature, telephone details; date of birth; internet protocol addresses; educational background; photographs; Employee record information, occupation; relationship to the investor, borrower or other relevant person.

¹ **Employees** mean directors, employees, agents or representatives of RMBL, contractors and consultants, including committee members.



- **Financial information and account details**

Bank account or other financial account details; taxation information; credit history and other credit related information; details of assets and liabilities; income and expenses; court judgments and civil litigation history relating to financial matters; other financial information reasonably required to assess, establish or administer a financial product or service.

- **Other Sensitive Information**

Where reasonably necessary for our functions or activities, we may collect Sensitive Information that you voluntarily provide to us. We will generally only collect Sensitive Information with your consent, unless the collection is otherwise permitted or required by the Privacy Act or other applicable law. Sensitive information is personal information that includes information or an opinion about an individual's racial or ethnic origin; political opinions or associations; religious or philosophical beliefs; trade union membership or associations; sexual orientation or practices; criminal record; health or genetic information; some aspects of biometric information.

- **Government related identifier**

In certain limited cases, government identification numbers such as passport number, tax file number or driver's licence number, Medicare card number or other government-issued identification information required for identification, verification or regulatory compliance purposes.

- **Telephone recordings**

We may record telephone conversations with you and our Employees for quality assurance, training, record-keeping, dispute resolution, compliance and security purposes where permitted by law.

- **Photographs and video recordings**

Photographs or video recordings (where you are identifiable) created in connection with our business activities, marketing activities, and for other reasonably necessary purposes as required by and permitted by law.

- **Information to investigate or prevent crime, including fraud and money laundering**

This may include information required in our dealings with external auditors, law firms, law enforcement agencies and other relevant third parties for this purpose.

- **Credit Information (for loan facilities)**

When you apply for a loan facility with us or provide a guarantee, we may collect credit information permitted under the Privacy Act. This may include consumer credit liability information, repayment history information, financial hardship information, information relating to credit applications, any default information, payment information, any new arrangement information, any court proceedings information, any personal insolvency information, certain publicly available information relevant to your creditworthiness, and any information relating to serious credit infringements (collectively referred to as **Credit Information**).

We may obtain Credit Information about you from credit reporting bodies (CRB) and maintain internal records relating to your creditworthiness and credit history. We may use this information to assess your credit application(s), manage credit risk and administer our lending activities.



- **Marketing preferences and customer feedback**

You may let us know your marketing preferences, survey responses, feedback and complaints.

- **Social media account and information from Applications**

We may receive certain Personal Information about you when you use our Applications or Social Media Pages, including your social media account identifier, profile information you make available to us and information shared with us when you connect your social media account to our RMBL Online Services.

- **Information from third parties and publicly available sources**

To improve the quality of our financial products and services, and to carry out research and analysis, we, and in some circumstances our external service providers, may supplement the Personal Information we collect with information from other sources, such as publicly available sources where permitted by law. This may include publicly available websites and social media platforms, CRBs, public registers, commercially available sources and information from our affiliates or business partners and external service providers.

- **Closed-Circuit Television (CCTV)**

To ensure the safety and security of our Employees, visitors, property and assets, we may also collect personal information such as images through CCTV surveillance systems which are active and notified of in our South Yarra office. CCTV recording will be destroyed/de-identified in accordance with our legal obligations as set out in the Surveillance Devices Act 1999 (Victoria). RMBL does not monitor the activities of its Employees in the workplace.

RMBL usually collects Personal Information directly from an individual, from the individual's financial adviser or other appointed representative, in certain cases from websites or other publicly available information or from available searches or information services, and in limited cases, from contact lists acquired from other parties.

Where lawful and practicable, individuals may have the option of dealing with us anonymously or by using a pseudonym. However, in most circumstances this will not be practicable, because we need to identify the individual to enter and provide financial services (investment and lending), manage your accounts, comply with legal and regulatory obligations, and ensure that only authorised persons can access or amend Personal Information held by us.

RMBL holds Personal Information in a combination of paper-based files, electronic records (including databases, document management systems and email) and third-party hosted systems (including cloud-based platforms). RMBL takes reasonable steps to protect Personal Information held in each of these formats from misuse, interference, loss and unauthorised access, modification or disclosure.

HOW WE USE PERSONAL INFORMATION

We collect, hold, use and disclose Personal Information for purposes that are reasonably necessary for our business activities, to provide our financial products and services, and to comply with our legal and regulatory obligations. Depending on your relationship with us, we may use Personal Information to:

- Communicate with you and relevant third parties as part of our business activities.
- Send you important information regarding changes/updates to our financial products and services, RMBL Online Services and other administrative information.



- Make decisions about whether to provide financial product and services, and, where applicable, manage any complaints, claims or disputes relating to such.
- Verify your identification documents to comply with the requirements set out in the Anti-Money Laundering and Counter-Terrorism Financing (**AML-CTF**) legislation.
- Provide improved quality assurance, Employee training, verification and compliance requirements (for example, with respect to disclosed recorded or monitored phone calls to our contact numbers).
- Prevent, detect and investigate crime, including fraud and money laundering, cyber incidents and to analyse and manage other commercial risks.
- Carry out research and analysis, including data analytics and analysis of our customer base and other individuals whose Personal Information we collect as explained in this Policy.
- Provide marketing information to you (including information about other financial products and services offered by selected third parties).
- Personalise and improve your experience when using our RMBL Online Services and digital platforms.
- Identify you to anyone to whom you send messages through our RMBL Online Services.
- Allow you to participate in promotions. Some of these activities have additional terms and conditions, which could contain additional information about how we use and disclose your Personal Information, so we suggest that you read these carefully. We may periodically send you marketing communications about our financial products and services that may be of interest to you, where permitted by law and subject to your marketing preferences and opt-out rights.
- Manage our business operations and comply with internal administration activities including those relating to auditing; finance and accounting; billing and collections; information technology systems; data and website hosting; business continuity; and records, document and print management and retention.
- Comply with applicable laws, process and regulatory obligations (including laws outside your country of residence), such as those relating to anti-money laundering, sanctions and anti-terrorism; and respond to requests from public and governmental authorities (including those outside your country of residence).
- Assess, recruit and engage prospective employees, contractors and other personnel.

Loan Facilities

If you are a borrower, prospective borrower, guarantor or prospective guarantor, we may collect, hold, use and disclose your Personal Information, Credit Information and, where permitted by law, credit eligibility information to:

- assess your application for credit or suitability as a guarantor;
- assess your creditworthiness, financial position and ability to meet your obligations;
- establish, administer and manage a credit facility, guarantee or security arrangement;
- administer and enforce our rights in relation to a credit facility, guarantee or security arrangement;



- collect overdue payments and recover amounts owing; and
- comply with our legal, regulatory and risk management obligations.

To support these activities, we may disclose your Personal Information, Credit Information and, where permitted by law, credit eligibility information to third parties as permitted or required by law, including CRBs, other credit providers, government agencies, regulators, prospective or existing guarantors, persons providing security, professional advisers and external service providers.

We may also disclose your Credit Information to CRBs for purposes permitted under the Privacy Act, including obtaining credit reporting information and assessing your creditworthiness. The CRBs that RMBL may disclose credit information to, or collect credit reporting information from, include Equifax Australia (www.equifax.com.au). Equifax Australia has its own privacy policy governing its handling of credit-related information. You may contact Equifax directly to obtain a copy of its credit reporting policy or to make a complaint. Equifax Australia may include the information we disclose to them, in the reports that they provide to other credit providers. In connection with the assessment, administration, funding or management of a loan or investment, we may disclose limited Personal Information about borrowers to independent valuers, professional advisers, external service providers and prospective or existing investors in our funds. This may include your name, information about the secured / security property, the purpose of the loan and information relevant to your experience or capacity to undertake the project or business activity being financed.

Where Personal Information is disclosed to investors or prospective investors, we will take reasonable steps to ensure that only Personal Information reasonably necessary for the relevant purpose is disclosed and that such disclosure is permitted by law.

INTERNATIONAL TRANSFER OF PERSONAL INFORMATION

For the purposes set out above we may transfer Personal Information to parties located in other countries (including countries that have a different data protection regime than is found in Australia). For example, we may transfer Personal Information to overseas recipients who provide data storage facilities or other information technology infrastructure. All Personal Information disclosures and transfers are in compliance with the APPs.

The countries where Personal Information, Credit Information and credit eligibility information may be disclosed include the United States; New Zealand; or India.

SHARING AND DISCLOSURE OF PERSONAL INFORMATION

While making use of your Personal Information, RMBL may need to make Personal Information available to the following categories of recipients where reasonably necessary for our business activities, to provide our financial products and services, or where required or authorised by law.

▪ Our external service providers

Subject to any consents required from you, external service providers, such as auditors, experts, lawyers and other outside professional advisers; mailing houses; information technology system, support and hosting external service providers; printing, advertising and market research and analysis of external service providers; banks and financial institutions that service our accounts; document and record management providers; construction consultants such as engineers; identity verification and AML-CTF external service providers; and similar third party vendors and outsourced external service providers; that assist us in carrying out our business activities.



We take reasonable steps to ensure that external service providers handle Personal Information in accordance with applicable privacy laws and only for authorised purposes.

▪ **Regulatory authorities and third parties involved in court action**

RMBL may disclose Personal Information to government agencies, regulators, law enforcement bodies, courts, tribunals and other public authorities where we believe to be necessary or appropriate:

- (a) to comply with applicable laws, including laws outside your country of residence
- (b) to comply with legal and regulatory obligations
- (c) to respond to requests from public and government authorities including public and government authorities from outside your country of residence
- (d) to protect our rights, privacy, safety or property, and/or that of our business, you or others; and
- (e) to allow us to pursue available remedies or limit our damages.

▪ **Other Authorised Disclosures**

We may share Personal Information with payees; emergency providers (e.g. fire, police and medical emergency services); credit reporting agencies; and other people involved in an incident that is the subject of a claim; as well as purchasers and prospective purchasers or other parties in any actual or proposed re-organisation, merger, sale, joint venture, assignment, transfer or other transaction relating to all or any portion of our business, assets or shares where the disclosure is required or authorised by law or the disclosure is otherwise permitted under the Privacy Act.

Please note that any information you post or disclose through RMBL Online Services may become public information and may be available to visitors to RMBL Online Services and to the general public. We urge you to be very careful when deciding to disclose your Personal Information, or any other information, on the RMBL Online Services or via Client Documents.

SECURITY

RMBL takes reasonable steps to protect Personal Information from misuse, interference, loss, and unauthorised access, modification or disclosure. While we implement appropriate security measures, no method of data transmission or storage can be guaranteed to be completely secure. If you believe that the security of any Personal Information you might have with us has been compromised (including by any other holder of your Personal Information), please notify us immediately. (See contact details below).

When RMBL provides Personal Information to an external service provider, we take reasonable steps to ensure they protect the information and handle it in accordance with applicable privacy laws.

If RMBL becomes aware of an eligible data breach, we will respond in accordance with our obligations under the Privacy Act, including notifying affected individuals and the Office of the Australian Information Commissioner (OAIC) where required.



RETENTION OF PERSONAL INFORMATION

RMBL takes reasonable steps to ensure that the Personal Information it holds is reliable for its intended use, and as accurate, up to date and complete as is necessary to carry out the purposes and activities described in this Policy. RMBL will retain Personal Information for the period necessary to fulfil the purposes outlined in this Policy unless a longer retention period is required or permitted to comply with legal and regulatory obligations, including for AML-CTF purposes. Credit Information will be retained in accordance with RMBL's Data Retention Policy and applicable laws. When Personal Information or Credit Information is no longer required, we will take reasonable steps to destroy or de-identify it, unless we are required by law to retain it.

PERSONAL INFORMATION OF OTHER INDIVIDUALS

If you provide Personal Information to RMBL regarding other individuals, you must ensure that you are authorised to do so and, where required by law, have obtained the individual's consent. You should also take reasonable steps to make the individual aware of this Policy and how we may collect, use and disclose their Personal Information.

CONTACT DETAILS

We will provide you with regular opportunities to tell us your marketing preferences, including in our communications to you. You can also contact us to tell us your marketing preferences or to opt-out by email at marketing@rmb.com.au or at the following contact details:

Privacy Officer

RMBL Investments Limited

Level 5, 225 Lonsdale Street Dandenong Victoria 3175

Phone: (03) 9213 5700

Email: privacy@rmb.com.au

If you no longer want to receive marketing-related emails from RMBL on a going-forward basis, you may also opt-out of receiving these marketing-related emails by clicking on the link to "unsubscribe" provided in each email or by contacting us at the above address.

ACCESS AND CORRECTION REQUESTS AND COMPLAINTS

You have the right to access your Personal Information and credit eligibility information held by RMBL on certain grounds and, if applicable, to request its correction. To do so, you may contact the Privacy Officer using the email address provided under the contact details set out above.

RMBL will correct Personal Information or Credit Information if it is satisfied that, having regard to the purpose for which the Personal Information or Credit Information is held, the information is inaccurate, out of date, incomplete, irrelevant or misleading.

Please note that some Personal Information may require us to refuse access to or correction of Personal Information in accordance with the Privacy Act or other applicable laws. This may include circumstances where providing access may prejudice law enforcement activities or result in non-compliance with AML-CTF obligations, including tipping-off provisions.



Complaints

If you wish to make a complaint about RMBL's handling of your Personal Information or credit-related information, or a failure to comply with Division 2 of Part IIIA of the Privacy Act or the Credit Reporting Privacy Code, you may contact our Privacy Officer using the details set out under the Contact Details section above. RMBL will manage your complaint in accordance with the RMBL Complaints Management Policy.

If you are not satisfied with our response, you may lodge a complaint with the OAIC. You can contact the OAIC via:

Website	www.oaic.gov.au
Email	enquiries@oaic.gov.au
Telephone	1300 363 992
Mail	GPO Box 5218, Sydney NSW 1042.

OTHER INFORMATION WE COLLECT THROUGH OUR RMBL ONLINE SERVICES

Other information is any information that does not reveal your specific identity, such as:

- browser type and device information
- App usage data
- information collected through cookies, pixel tags and other technologies
- demographic information and other information provided by you.

We and our external service providers may collect other information in a variety of ways, including:

When you visit our Site or use our RMBL Online Services, we and our external service providers may automatically collect technical and usage information, including information about your device, browser, IP address, pages visited, and how you interact with our RMBL Online Services.

We may use cookies and similar technologies to:

- operate and maintain our Site and online services
- improve functionality, performance and security
- analyse our Site usage and trends
- enhance your user experience.

You can manage or disable cookies through your browser settings. However, doing so may affect the functionality of certain features of our Site.

We may also collect information that you voluntarily provide to us through our Site or RMBL Online Services.

Where information collected through our Site or RMBL Online Services can identify you, or is reasonably capable of identifying you, it will be treated as Personal Information and handled in accordance with this Policy.



THIRD-PARTY WEBSITES

Our Site may contain links to third-party websites or services. RMBL is not responsible for the privacy practices, content or security of those third parties. We encourage you to review the privacy policies of any third-party websites you visit.

REVIEW

Risk & Compliance is responsible for monitoring compliance with this Policy.

The Chief Risk Officer (**CRO**) will report any non-compliance with this Policy to the Audit Risk & Compliance Committee and the RMBL Board of Directors (**Board**).

This Policy will be reviewed at least every two years or as required to reflect changes in legal, statutory or applicable standards or on a material change to the requirements or activities of RMBL or the RMBL Mortgage Income Investments, to ensure ongoing compliance with relevant regulatory obligations. Any updates to this Policy will be published on our Site.

The Board is responsible for approving Policy changes.

The CRO is delegated to make administrative amendments to this Policy and to update the Policy for approved changes made to other Related Documents.

RELATED DOCUMENTS

- Code of Conduct
- Complaints Management Policy
- Data Retention Policy
- Incidents & Breaches Reporting Policy
- IT Security Policy
- AML-CTF Compliance Program
- Risk Management Policy

Last updated: September 2026

