

PRIVACY POLICY

MANAGEMENT OF PERSONAL INFORMATION

We recognise the importance of your privacy and understand your concerns about the security of the personal information you provide to us. We comply with the Australian Privacy Principles (APPs) as contained in the *Privacy Act 1988* (Cth). The APPs detail how personal information may be collected, used, disclosed, stored and destroyed, and how an individual may gain access to or make complaints about the personal information held about them.

Personal information is information or an opinion about an identified individual, or about an individual who is reasonably identifiable.

Sensitive Information, a sub-set of personal information, is information or an opinion about an individual's racial or ethnic origin, political opinions, political association membership, religious beliefs or affiliations, philosophical beliefs, professional or trade association membership, trade union membership, sexual orientation or practices or criminal record, and includes health information and genetic information.

This policy details how we manage personal information about you (including sensitive information).

While doing business, we endeavour to collect business information only. However, the collection of personal information in some instances is necessary or unavoidable (for example, we are unable to provide investment and borrowing services to you personally, without collecting your personal information).

What personal information we collect and hold

The kinds of personal information we collect from you or about you depend on the nature of your transaction with us (for example, whether you invest or borrow with us.).

The kinds of personal information that we commonly collect and hold from you or about you include:

- **Generally** -, your name, address, phone, fax and mobile numbers, email address, date of birth, and drivers licence details;
- **Investors** -, your Tax File Number and bank account details;
- **Borrowers** -, your occupation, marital status, employment details, financial statements and financial records (including income details, sources of income, asset listings, liability listings, and tax returns etc), your Tax File Number, your bank account details and your Government-issued identification documents (e.g. passport, birth certificate etc). We also collect and hold the details of the individual unit holders, shareholders and beneficiaries of our corporate borrowers.

In some instances, we may collect, hold, use and disclose credit information and credit eligibility information about you. For further information, please see our Privacy Policy – Credit Information.

We may also obtain property reports from relevant authorities (eg. the State Titles Offices, the State Revenue Offices, Water authorities, Utilities authorities and Local Councils etc), about any real estate property which secures your obligations to us.

We may also collect other personal or sensitive information, depending on the nature of your transaction with us.

When you browse our website or contact us electronically, we record: statistical data including your computer system Internet address, your top level domain name (for example .com, .gov, .au, .uk etc), the date and time of your visit to the site, the pages you accessed and documents downloaded, and the type of browser you are using.

Note that our website does not have facilities for the secure transmission of emails or facsimile. If you are concerned about the security of any personal information you submit by email, please contact us using an alternative method.

How we collect and hold personal information

We aim to collect personal information directly from you unless it is unreasonable or impracticable for us to do so. For example, we collect personal information from you or about you from correspondence that you submit to us, meetings and interviews with us, telephone calls with us, the investment and / or borrowing instructions you provide to us, the completed application forms, identification check forms and other contractual documentation you submit to us, and from your activity on our website.

However, in some instances we may receive personal information about you from third parties, such as credit reporting bodies, your credit referees, Government agencies, associated businesses, and referrers (such as law firms, accountants, financial planners and your business advisory consultants). We may also receive personal information about you from your family members, authorised third parties and publicly available sources.

You can be anonymous or use a pseudonym when dealing with us, unless:

- the use of your true identity is a legal requirement; or
- it is impracticable for us to deal with you on such basis.

Why we collect, hold, use and disclose personal information

We collect, hold, use and disclose personal information from you or about you where it is reasonably necessary for us to carry out our business functions and activities, which include investment and lending products and services. For example, we collect, hold, use and disclose personal information as necessary to consider and process your application to invest in, or borrow under, our product and service offerings.

We will disclose personal information about you to credit reporting bodies to assess your credit worthiness, and report on payment defaults.

In relation to Borrowers, we may also disclose your personal information to third parties such as the Australian Securities and Investment Commission, and to Investors in our investment schemes, for the purposes of assisting the potential Investor to decide whether to invest their

funds into a loan. The information disclosed includes your name, property information, the reason or purpose for borrowing funds, documents required to be entered into as security for the loan. Details such as financial information relevant to your ability to service the loan and funding requirements for development projects (if applicable), source of income, credit worthiness and ability to complete a construction project if applicable and previous experience or projects undertaken may also be disclosed in certain circumstances. We may also disclose your personal information to our legal advisers for the purposes of facilitating transactions.

We may collect sensitive information from you or about you where there is a legal requirement to do so, or where we are otherwise permitted by law. In all other situations, we will specifically seek your consent.

We also collect, hold, use and disclose your personal information for purposes related to our investment and borrowing facilities that you would reasonably expect, such as internal and regulatory audit investigations, performance reporting, investment planning, our own internal administrative and accounting functions, our obligations under professional and compliance schemes, data backups, marketing and promotions, ongoing newsletter communications, providing you with details about investment changes, educational briefings and other service offering updates, conducting client satisfaction surveys and feedback requests, statistical collation and website traffic analysis.

Where we use your personal information for marketing and newsletter communications, you can opt out at any time by notifying us. Opt out procedures are also included in our communications.

We may also disclose your personal information to third parties (including Government departments such as the Australian Taxation Office and enforcement bodies) where required or permitted by law.

Where we wish to use or disclose your personal information for other purposes, we will obtain your consent.

If we do not collect, hold, use or disclose your personal information, or if you do not consent, then we may not be able to answer your enquiry, process your application to invest or borrow funds, or provide the services that you or your organisation have contracted us to provide.

How we hold and store personal information

Your personal information is held and stored on paper, by electronic means or both. We have physical, electronic and procedural safeguards in place for personal information and take reasonable steps to ensure that your personal information is protected from misuse, interference, loss and unauthorised access, modification and disclosure:

- Data held and stored on paper is stored within secure key-card premises with monitored alarms.
- Data held and stored electronically is protected by internal and external firewalls, and our electronic databases require passwords for access.
- Access to personal information is restricted to staff and contractors whose job description requires access. Our employees and contractors are contractually obliged to maintain the confidentiality of any personal information held by us.

- Data stored or archived off-site is contained within secure facilities. We also require our storage contractors to implement privacy safeguards.
- Our staff receive regular training on privacy procedures.

Destruction and De-identification

We will retain your personal information whilst it is required for any of our business functions, or for any other lawful purpose. We will commonly destroy your personal information seven years from the date that your account is closed.

We use secure methods to destroy or to permanently de-identify your personal information when it is no longer needed:

- Paper records are sent for secure destruction. In some instances, paper records will be returned to you and/or relevant third parties.
- Electronic records are deleted from all locations, to the best of our ability. In addition, data is aged and purged from RMBL backup systems based on data retention rules.

Overseas disclosure

If you are a Borrower, we may disclose certain personal information about you to Investors in our investment schemes who are located overseas. However, we will only do so where:

- it is for the purpose of assisting the potential Investor to make a decision as to whether to invest their funds into a loan of which you are a part; or
- it is otherwise permitted by law.

We can provide you with a listing of the overseas countries involved in each loan upon request.

Requests for access and correction

We have procedures in place for dealing with and responding to requests for access to, and correction of, the personal information held about you.

In most cases, we expect that we will be able to comply with your request. However, if we do not agree to provide you access or to correct the information as requested, we will give you written reasons why. For further information, please contact us.

To assist us to keep our records up-to-date, please notify us of any changes to your personal information.

Complaints and Concerns

We have procedures in place for dealing with complaints and concerns about our practices in relation to the Privacy Act and the APPs. We will respond to your complaint in accordance with the relevant provisions of the APPs. For further information, please contact us.

Updates to our Privacy Policy

From time to time, it may be necessary for us to review our Privacy Policy. We may amend our Privacy Policy at any time and notify you by providing you with an updated version.

Contact

Privacy Officer
RMBL Investments Limited
Level 3, 33 Princes Highway
Dandenong Victoria 3175

Phone: (03) 9213 5700
Fax: 1300 886 662
Email: privacy@rmb.com.au

July 2023