

PRIVACY POLICY

MANAGEMENT OF PERSONAL INFORMATION

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

Sensitive Information, a sub-set of personal information, that includes 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.

1. Purpose of this Policy

RMBL recognises the importance of your privacy and appreciates you may have concerns about the security of the personal information you provide to us and how this information is held, used and disclosed. RMBL is bound by the Privacy Act 1988 (Cth) (Privacy Act), including the Australian Privacy Principles (APPs). We are committed to protecting the privacy of your personal information obtained through our investment and borrowing operations for the services provided to you.

The purpose of this policy is to inform people of:

- what personal information we collect and hold;
- how and when we collect personal information;
- how we use and disclose personal information;
- how we hold and store personal information;
- how we destroy and de-identify personal information;
- how an individual can access and correct their personal information; and
- how we will facilitate or resolve a privacy complaint.

2. 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 types of personal information that we commonly collect, and hold includes the following:

Generally:	Investors:	Borrowers:
<ul style="list-style-type: none"> • Name • Address • Date of birth • Phone and mobile numbers • Email address 	<ul style="list-style-type: none"> • Tax File Number • Bank account details • Occupation • Source of wealth and funds • Government-issued identification documents (e.g. passport, drivers licence etc). • For non-individual investors: <ul style="list-style-type: none"> ○ Details of shareholders, beneficiaries, unit and office holders. ○ Nature of business relationship 	<ul style="list-style-type: none"> • Occupation • Employment details • Financial statements and financial records (including income details, sources of income, asset listings, liability listings, and tax returns etc), • Tax File Number • Bank account details • Government-issued identification documents (e.g. passport, drivers licence etc) • Details of the individual unit holders, shareholders and beneficiaries of corporate borrowers

When you borrow from us, we may collect, hold, use and disclose credit information and credit eligibility information about you to third parties such as Government bodies. For further information, please see our Privacy Policy – Credit Information. We may also obtain property data, reports and documentation from relevant authorities (e.g. 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.

When you visit our website or communicate with us electronically, we may collect statistical information such as your device's IP address, the date and time of your visit, the pages viewed, any documents downloaded, and the type of browser used. We may also use cookies and similar technologies to enhance website functionality and gain insights into how visitors interact with our site. This may involve the use of reputable third-party analytics to gather information on pages visited, time spent on the site, and general browsing patterns. This information is collected in accordance with the Privacy Act 1988 (Cth) and the APPs and is used for purposes that are necessary for our functions and activities including improving our services, optimising website performance, and tailoring content.

You can choose to disable cookies via your browser settings; however, some features of our website may not function as intended if you do so. 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.

To ensure the safety and security of our staff, visitors, property and information we may also collect personal information through CCTV surveillance systems which are active in our South Yarra office.

3. How we collect personal information

We aim to collect personal information that has been directly provided to us from you. However, RMBL may from time to time collect personal information from alternative sources when it is unreasonable or impracticable for us to collect this information directly from you. The following are examples of how we may collect personal information about you:

Collection directly from you:	Collection from alternative sources:
<ul style="list-style-type: none"> • 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; • other contractual documentation you submit to us; and • from your activity on our website. 	<ul style="list-style-type: none"> • credit reporting bodies; • your credit referees; • government agencies; • associated businesses; • referrers (such as law firms, accountants, financial planners and your business advisory consultants); • your family members; • authorised third parties; or • publicly available sources.

We also log IP addresses, or the location of computers on the internet to help diagnose problems with our server and for security purposes.

Unsolicited Information

In the event RMBL collects personal information that we did not actively request (known as unsolicited information) from you or by a third party, and it is determined by RMBL that the personal information is not required, we will destroy the information or ensure that the information is de-identified.

4. How we use your personal information

We use 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 use personal information as necessary to consider and process your application to invest in, or borrow under, our product and service offerings.

We may use 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.

If we do not use 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.

Sensitive Information

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. If you do provide us with any sensitive personal information, we will take all reasonable steps to ensure that the sensitive information is securely protected and when not required is destroyed or de-identified.

5. How we disclose your personal information

We may disclose your personal information to third parties for the purpose of providing services to both of us. We will seek your consent to disclose your personal information unless the disclosure is required or permitted by law for example to Government departments such as the Australian Taxation Office and enforcement bodies.

If we do not 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.

In relation to our Borrowers:

We may disclose personal information about you to:	The information disclosed includes:
<ul style="list-style-type: none">• credit reporting bodies to assess your credit worthiness, and report on payment defaults;• to third parties such as the Australian Securities and Investment Commission;• investors in our Fund, for the purposes of assisting the potential Investor to decide whether to invest their funds into a loan; and• to our legal advisers for the purposes of facilitating transactions.	<ul style="list-style-type: none">• your name;• property information;• the reason or purpose for borrowing funds;• documents required to be entered into as security for the loan;• financial information relevant to your ability to service the loan;• funding requirements for development projects (if applicable);• source of income;• credit history; and• previous experience or projects undertaken.

We may also disclose CCTV footage to law enforcement or other third parties where permitted by law.

Overseas disclosure

The nature of our business activities may on occasion require that your personal information be disclosed to overseas recipients in order to provide investment or borrowing services to you. This may occur if you are a Borrower and certain personal information about you is disclosed to Investors in our investment Fund 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.

We may also send your personal information to service providers or third parties including, IT services providers such as data storage facilities or other IT infrastructure who are located overseas. Where your information is sent and stored overseas, it is likely to be one of the following countries:

- United States;
- New Zealand; or
- India.

Before disclosing any personal information to an overseas recipient RMBL takes reasonable steps to ensure that the overseas recipient complies with the APPs contained within the Privacy Act 1988 (Cth) (Privacy Act) or is bound by a substantially similar privacy scheme.

6. 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.

CCTV footage is securely stored and retained for no longer than 30 days, unless required for investigation or legal purposes with access restricted to authorised personnel.

7. 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 take reasonable steps to 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, or encrypted and/or placed beyond use.

8. Direct marketing

If you have provided us with your express or implied consent, we may send you direct marketing communication relating to our product, market and economic updates or events using your personal information provided to us to do so. These communications will usually be sent to you via email.

If at any time you no longer wish to receive any further direct marketing communication from us, you can opt out at any time by following the "unsubscribe" link in the marketing emails sent to you, or by contacting us directly at marketing@rmb.com.au

Please note that even if you opt out of marketing communications, we will still send you non-marketing communications, such as those related to your account with us.

9. 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.

Your request for access should include a detailed description of the information required, including enough information so we can verify your identity and, if necessary, your right to the information. 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, if you believe that the information we hold about you is inaccurate, incomplete or out of date please notify us with the details of your correction request. We will provide you with a written response to your personal information access and correction requests within 30 days of our receipt of the request.

10. Complaints and Concerns

If you have a complaint about the handling, use or disclosure of your personal information, write to our Privacy Officer at the contact address below.

We have procedures in place for investigating and 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.

11. 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 5, 225 Lonsdale Street Dandenong Victoria 3175
Phone: (03) 9213 5700
Email: privacy@rmbbl.com.au

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