

Santilli Group Privacy Policy

1 Privacy generally

This privacy policy applies to the handling of personal information by Santilli Group Pty Ltd ACN 645 303 411 of Level 27, 101 Collins Street Melbourne VIC 3000 and its related entities (as specified in paragraph 6 below) (**Santilli, we us, our**).

Santilli understands the importance of protecting the privacy of an individual's personal information. This privacy policy sets out how Santilli aims to protect the privacy of your personal information, your rights in relation to your personal information managed by Santilli and how Santilli collects, holds, uses, discloses, and otherwise manages, your personal information.

In collecting, holding, using, disclosing and otherwise managing your personal information, Santilli will comply with the *Privacy Act 1988* (Cth) (**Privacy Act**) and the Australian Privacy Principles in the Privacy Act.

Santilli will regularly review its policies and procedures regarding personal information and may therefore update and amend this privacy policy from time to time. Any updated privacy policy will be made available on the Santilli website (located at <https://santilligroup.com.au>) or can otherwise be obtained by contacting us and requesting a copy.

2 Kinds of personal information collected and held

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

Santilli may collect and hold your personal information as a result of the provision of our services and the operation of our business in relation to developing and investing in commercial and industrial property projects.

The kinds of personal information that Santilli collects and holds will vary depending on our particular interaction or dealing with you. However, generally speaking, the kinds of personal information Santilli collects may include:

- (a) your name, address, telephone number, email address or other contacts details;
- (b) details regarding your dealings or interactions with us where any organisation that you are an employee or other representative of has business dealings with us (for example where that organisation invests with us or where we undertake a development project for or with that organisation);
- (c) information regarding our other dealings or interactions with you; and

- (d) where you apply for employment with us, contact information and information relevant to your application for employment (such as information regarding your work history).

Generally, we do not collect sensitive information about individuals. Information about your health, racial or ethnic origin, political persuasions, criminal record and religious or philosophical beliefs are all examples of sensitive information. If we do need to collect sensitive information about you, we will only do so with your consent or where we are required or permitted to do so by law.

Santilli may collect statistical information when you access and use our websites and any online platforms available via our websites, including by utilising features and technologies of your internet browser, such as cookies and pixel tags. We use this information to analyse how our websites and other online services are being used and seek to improve our websites and other online services and provide more user friendly and customised websites and online services. These features and technologies do not specifically identify you unless you expressly provide to us personally identifiable information. You may also elect to turn off the internet browser features which allow us to collect statistical information by selecting certain options on your browser. However, this may slow down or cause certain web pages to be inaccessible to you.

3 How we collect personal information

Generally, Santilli collects your personal information directly from you. For example, Santilli may collect personal information from you:

- (a) where you request information or services or otherwise provide us with your details;
- (b) where we have dealings or interactions with you in respect of our property development and investment services;
- (c) where you use our websites or otherwise interact with us;
- (d) if you attend an event or function organised by us; or
- (e) if you post information on any of our websites or social media sites.

Generally, Santilli will only collect your personal information from sources other than you if it is unreasonable or impracticable to collect that personal information from you. However there may be occasions when Santilli collects your personal information from someone other than you, for example:

- (a) from our other service providers that help us provide our services;
- (b) from third parties you authorise to disclose your information to us;
- (c) from an organisation that you are an employee or other representative of;

- (d) from a publicly maintained record or other publicly available sources of information including social media and similar websites;
- (e) from marketing agencies, data collection and research organisations; or
- (f) from our investment partners or site vendors relating to a particular investment or property development opportunity.

4 Purposes for which personal information is used

Generally speaking, Santilli collects and uses personal information so that we can provide our property development and investment services.

Some examples of the purposes for which Santilli collects, holds, uses and discloses your personal information include to:

- (a) supply our services to you or an organisation that an employee or other representative of;
- (b) supply you with information you request from us or otherwise respond to queries or requests for information that you submit to us;
- (c) undertake direct marketing (as further described below);
- (d) analyse information we collect so that we can administer, support, improve and develop our business and the services we offer; and
- (e) comply with the obligations of Santilli under any applicable laws.

In addition to the purposes listed above, Santilli may use your personal information for other purposes which we notify you of when we collect the information and for purposes otherwise permitted or required by law.

Where personal information is used or disclosed, Santilli takes steps reasonable in the circumstances to ensure it is relevant to the purpose for which it is to be used or disclosed. You are under no obligation to provide your personal information to Santilli. However, without certain information from you, Santilli may not be able to provide products, services or information to you or may be limited in how we can interact with you.

5 Direct marketing

In addition to the purposes outlined in paragraph 4 above, Santilli and our third party service providers (on our behalf) may use and disclose your personal information in order to send you direct marketing communications regarding:

- us, our services or investment opportunities that we think may be of interest to you or an organisation that you are an employee or other representative of; or

- events, seminars, functions or publications that we think may be of interest to you or an organisation that you are an employee or other representative of.

This may include Santilli disclosing your personal information to related companies of Santilli or our third party service providers for the purpose of such direct marketing communications being sent. If you do not wish to receive such communications, you can opt-out by contacting Santilli via the contact details set out in paragraph 9 of this privacy policy or through the opt-out mechanism contained in a marketing communication to you.

6 Disclosure of personal information

Santilli discloses your personal information for the purpose for which Santilli collects it. As a result, generally, Santilli will only disclose your personal information for a purpose set out in paragraph 4 of this privacy policy. This may include disclosing your personal information to:

- (a) related companies of Santilli, including Santilli Capital Pty Ltd (ABN 73 646 159 417), Santilli Developments Pty Ltd (ABN 58 646 159 355), Santilli Developments Pty Ltd No. 11 (ABN 72 646 419 801), Santilli Developments Pty Ltd No. 12 (ACN 647 599 531), Santilli Developments Pty Ltd No. 14 (ABN 68 647 599 602), Santilli Developments Pty Ltd No. 15 (ACN 648 911 764) and Santilli Developments No. 16 Pty Ltd (ACN 648 911 773);
- (b) any fund that Santilli or our related companies act as investment manager for;
- (c) our site vendors and investment partners to the extent relevant to our property development or investment services;
- (d) third parties considering acquiring an interest in or who do acquire an interest in any business or assets of Santilli or any development or property being undertaken by Santilli;
- (e) service providers and contractors and other third parties that provide products or services to us (including our technology service providers or other business or administration service providers);
- (f) Santilli's professional advisors (including legal and accounting firms, auditors, consultants, insurers and other professional advisers); and
- (g) Government authorities where required by law.

Santilli may also disclose your personal information for other purposes if we notify you of the disclosure at or about the time of collecting the information, we have otherwise received your consent or the disclosure is required or authorised by law.

If you post information or other content to public sections of our websites or to our social media sites, you acknowledge that the information or content may be viewed by the public and/or users of the relevant website or social media site.

Santilli does not currently disclose personal information to recipients located overseas or have established plans to do so. If Santilli is likely to disclose personal information to other recipients located overseas, Santilli will update this privacy policy regarding the likely disclosures (including, if it is practicable to do so, the countries in which such overseas recipients are likely to be located).

7 Security of personal information

Santilli takes steps reasonable in the circumstances to ensure that the personal information it holds is protected from misuse, interference and loss and from unauthorised access, modification or disclosure.

Your personal information will be kept on databases held on servers kept in a physically and technologically secured environment, accessed only by authorised personnel or contractors. Where personal information is held in hard copy, it will be held in controlled, access restricted premises which only authorised personnel or contractors will be permitted to access.

Santilli will destroy or de-identify personal information in circumstances where it is no longer required, unless Santilli is otherwise required or authorised by law to retain the information.

8 Access and correction

Santilli takes steps reasonable in the circumstances to ensure personal information it holds is accurate, up-to-date, complete, relevant and not misleading.

Under the Privacy Act, you have a right to seek access to and correction of your personal information that is collected and held by Santilli. If at any time you would like to access or correct the personal information that Santilli holds about you, or you would like more information on Santilli's approach to privacy, please contact the Santilli Privacy Officer using the details set out in paragraph 9 below. Santilli will grant access to the extent required or authorised by the Privacy Act or other law and will take steps reasonable in the circumstances to correct personal information where necessary and appropriate.

To obtain access to your personal information:

- (a) you may be required to provide proof of identity to ensure that personal information is provided only to the correct individuals and that the privacy of others is protected;
- (b) Santilli requests that you be reasonably specific about the information you require; and
- (c) Santilli may charge you a reasonable administration fee, which reflects and will not exceed the cost to Santilli for providing access in accordance with your request.

Santilli will endeavour to respond to your request to access or correct your personal information within 30 days from your request. If Santilli refuses your request to access or correct your personal information, Santilli will provide you with written reasons for the refusal and details of complaint mechanisms.

If you are dissatisfied with Santilli's refusal to grant access to, or correct, your personal information, you may make a complaint to the Office of the Australian Information Commissioner.

9 Contacting Santilli

For further information or enquiries regarding your personal information, or if you would like to opt-out of receiving any promotional or marketing communications or make a privacy complaint, please contact Santilli's Privacy Officer using any of the following contact details:

Email: admin@santilligroup.com.au

Post: Level 27, 101 Collins Street Melbourne, 3000

Phone: +61 3 9221 6161

10 Privacy complaints

If you believe that we have not dealt with your personal information in a manner that complies with the Privacy Act or the Australian Privacy Principles, you can make a complaint to us.

Please direct all privacy complaints to Santilli's Privacy Officer. At all times, privacy complaints:

- (a) will be treated seriously;
- (b) will be dealt with promptly;
- (c) will be dealt with in a confidential manner; and
- (d) will not affect your existing obligations or affect the commercial arrangements between you and Santilli.

Santilli will acknowledge your complaint within 7 days of receipt and endeavour to resolve it within 30 days, unless Santilli informs you otherwise and seeks your agreement in writing.

Santilli's Privacy Officer will commence an investigation into your complaint. You will be informed of the outcome of your complaint following completion of the investigation. In the event that you are dissatisfied with the outcome of your complaint, or an extension to the time in which Santilli will resolve it, you may refer the complaint to the Office of the Australian Information Commissioner.