



# GLOBAL CAPITAL

## PROPERTY FUND

### *Privacy Policy (V1.2)*

*Issue Date: 31 July 2021*

**Global Capital Property Fund Limited**

Level 33  
360 Collins Street  
Melbourne, VIC 3000  
AUSTRALIA

ABN: 92 635 565 070

ACN: 635 565 070

CAR: 001282379

AFSL: United Global Capital Pty Ltd - 496179

Throughout this Privacy Policy, Global Capital Property Fund is referred to as “GCPF”, “we”, “us”, “our” or any such variations.

This Privacy Policy does not relate to financial services provided by firms, companies, individuals or institutions which GCPF does business with or introduces clients to.

This Privacy Policy is dated **31 July 2021** and replaces all previous versions.

## Our Commitment to Privacy

This following document sets forth the Privacy Policy for **Global Capital Property Fund Limited and its associated entities** for the collection, storage, maintenance, access and use of personal information as contemplated in the Privacy Act 1988 (Commonwealth). This policy applies to all divisions, organisations and trading names associated with **Global Capital Property Fund Limited**.

Further information pertaining to privacy and the operation of the Privacy Act 1988 can be found on the website of the Office of the Australian Information Commissioner (OAIC) at [www.oaic.gov.au](http://www.oaic.gov.au)

## Compliance with the Privacy Act

**Global Capital Property Fund Limited** is committed to providing you with the best possible customer service experience. **Global Capital Property Fund Limited** is bound by the Privacy Act 1988 and the 13 Australian Privacy Principles introduced by the Privacy Amendment (Enhancing Privacy Protection) Act 2012, applied as of 12 March 2014. The Australian Privacy Principles are a regulative guide on the management of personal information in the private and public sectors, which sets out a number of Principles formulated to protect information confidentiality and the privacy of individuals.

Definition in this Privacy Policy:

- “Customer/s” means our customers, clientele, investors, suppliers and contractors
- “Personal Information” means any information or opinion from which a customer’s identity is apparent or can be easily ascertained

## Collection of your Personal Information

In order to ensure Global Capital Property Fund Limited deliver the best possible service to its customers it is necessary for Global Capital Property Fund Limited to collect personal information. Dependant on the type of any relationship between Global Capital Property Fund Limited and its potential or actual customers will determine the information that is collected. Upon collection of this personal information, Global Capital Property Fund Limited will take reasonable steps to advise its customers as to the purpose for which the personal information is collected, customer rights to access the information and other matters concerning the Australian Privacy Principles. There are many aspects of the Global Capital Property Fund Limited website which can be viewed without providing personal information, however, for access to future **Global Capital Property Fund Limited** customer support features you are required to submit personally identifiable information. This may include but not limited to a unique username and password or provide sensitive information in the recovery of your lost password.

Global Capital Property Fund Limited will not actively seek to collect sensitive information defined as, ethnicity, religious preference or health information, however, should Global Capital Property Fund Limited be required to seek sensitive information, it will do so in accordance with the Australian Privacy Principles. Generally, Global Capital Property Fund Limited will only collect personal information from its customers unless it is not reasonable or practical or the customer consents to such information being collected from any third party. Reasonable steps will be taken in ensuring its customers are aware of an organisation or

type of organisation to receive personal information should Pink Property seek to disclose same information.

### **Type of Personal Information to be Collected**

Global Capital Property Fund Limited will seek to collect the following information:

- Individual and Company data including, entity name, postal and email address, contact numbers
- Profile of existing and potential purchasers of property/ies and investors
- Parties enquiring via Global Capital Property Fund Limited or affiliated or non affiliated websites
- From time to time as is reasonable, bank account details
- Transactional information
- Information relating to other individuals or companies whom come into contact with Global Capital Property Fund Limited

In order for Global Capital Property Fund Limited to fulfil its services to its customers Global Capital Property Fund Limited may be required to collect further information, as such, the aforesaid list is not an exhaustive list.

Global Capital Property Fund Limited may also collect personal information by way of electronic, photographic and hard copy enquiry forms, statutory contracts, questionnaires, inbound and outbound telemarketing campaigns, display suite, open home and exhibition attendance.

### **Sharing of your Personal Information**

Global Capital Property Fund Limited collects, holds, uses and discloses personal information about individuals and may occasionally hire other companies to provide services on our behalf, including but not limited to handling customer support enquiries, processing transactions or customer freight shipping. Those companies will be permitted to obtain only the personal information they need to deliver the service. **Global Capital Property Fund Limited** takes reasonable steps to ensure that these organisations are bound by confidentiality and privacy obligations in relation to the protection of your personal information.

For the most part but not limited to that above, it may be necessary for Global Capital Property Fund Limited to use personal information for the following purposes:

- to comply with Australian law or a court or tribunal order
- to notify individuals of residential, commercial or industrial real estate available to purchase that Global Capital Property Fund Limited believe those individuals would be interested
- to notify individuals of residential, commercial or industrial real estate available to lease that Global Capital Property Fund Limited believe those individuals would be interested
- to notify individuals of new residential, commercial or industrial real estate available to that Global Capital Property Fund Limited believe those individuals would be interested
- to notify activities and campaigns to individuals, including direct marketing of Global Capital Property Fund Limited, its products or services
- to notify individuals about promotions, competitions or special offers offered by Global Capital Property Fund Limited or carefully selected third parties

- to facilitate the running of promotions, competitions or special offers about products or services offered by Global Capital Property Fund Limited or carefully selected third parties
- to facilitate the running of and participation in loyalty programs, memberships and subscription services
- to facilitate third parties assisting Global Capital Property Fund Limited to administer and provide the goods or services individuals have requested which may consist of but not limited to; third party suppliers, printers, posting services
- to record information about an individual's usage of Global Capital Property Fund Limited's website through "cookies". (Note: Cookies are small data files stored by an individual's browser). Cookies enable Global Capital Property Fund Limited to analyse usage patterns on Global Capital Property Fund Limited's website in order to further improve the website and tailor it to better suite a user's needs
- to collect various payments from individuals

The purpose for which Global Capital Property Fund Limited collects personal information will be made clear where practicable at the time of collection.

Use or disclosure of personal information about an individual made by Global Capital Property Fund Limited for:

- direct marketing, then an individual may request not to receive direct marketing communications from Global Capital Property Fund Limited and Global Capital Property Fund Limited must give effect to the request within any reasonable timeframe
- the purposes of facilitating direct marketing by other organisations then an individual may request Global Capital Property Fund Limited not to use or disclose the individual's information for the purpose of facilitating direct marketing by other organisations and Global Capital Property Fund Limited must give effect to the request within a reasonable timeframe

An individual may also request Global Capital Property Fund Limited to be provided with the source of the information and Global Capital Property Fund Limited must do so within a reasonable timeframe after the request was made unless it is impracticable or unreasonable to do so. Global Capital Property Fund Limited will not charge any individual for the making of, or to give effect to, such requests.

### **Use of your Personal Information**

For each visitor to reach the Global Capital Property Fund Limited website, Global Capital Property Fund Limited expressly collect the following non-personally identifiable information, including but not limited to browser type, version and language, operating system, pages viewed while browsing the website, page access times and referring website address. This collected information is used solely internally for the purpose of gauging visitor traffic, trends and delivering personalized content to you while you are at this website.

From time to time, Global Capital Property Fund Limited may use customer information for new, unanticipated uses not previously disclosed in Global Capital Property Fund Limited privacy notice. If our Global Capital Property Fund Limited information practices change at some time in the future, Global Capital Property Fund Limited will use for these new purposes only, data collected from the time of the policy change forward will adhere to our updated practices.

### **Quality of your Personal Information**

Global Capital Property Fund Limited takes such steps necessary as are reasonable in the circumstances to ensure personal information collected is accurate, complete and up-to-date and having regard to the purposes of the use or the disclosure of the personal information that is collected, relevant.

### **Security of your Personal Information**

Global Capital Property Fund Limited will take such steps as are reasonable in the circumstances to protect the personal information it holds from misuse, interference (which may include measures to protect against computer attacks) and loss and from unauthorised access, modification or disclosure.

Global Capital Property Fund Limited will take such steps as are reasonable in the circumstances to destroy or permanently de-identify personal information about an individual that it holds if it is no longer needed for any purpose for which the information may be used or disclosed and is not required to be retained by law or a court or tribunal order.

### **Sensitive Information**

Global Capital Property Fund Limited will not collect sensitive information about an individual, including information about that individual's racial or ethnic origin, political opinions, membership of political association, religious beliefs or affiliations, philosophical beliefs (including political opinions on environmental issues), membership of a professional or trade association, membership of a trade union, sexual preferences or practices or criminal record.

### **Open and Transparent Management**

Global Capital Property Fund Limited will make this Privacy Policy publicly available on its website at <https://gcpfund.com.au> and will take reasonable steps to provide a copy of this Privacy Policy free of charge, to anyone who asks for it.

**On request by a person, Global Capital Property Fund Limited will take reasonable steps to let the person know, generally, what sort of personal information the Global Capital Property Fund Limited holds, for what purposes and how it collects, holds, uses and discloses that information.**

### **Accessing and Updating Information**

You have a right to access your individual personal information, subject to exceptions allowed by law.

Global Capital Property Fund Limited upon request from individuals who request access to the personal information that Global Capital Property Fund Limited holds about them from the Global Capital Property Fund Limited Privacy Officer will be provided within a reasonable timeframe after the request is received, unless Global Capital Property Fund Limited is legally authorised to refuse an individual's request. Where Global Capital Property Fund Limited withholds personal information, Global Capital Property Fund Limited may instead choose to give individuals a summary of that information. Global Capital Property Fund Limited reserves the right to charge a reasonable amount for providing access to this information on a per request basis.

Should individuals wish to change personal information that is out of date, inaccurate, incomplete, irrelevant or misleading at any time, please contact Global Capital Property Fund Limited's Privacy Officer. After notice from individuals, Global Capital Property Fund Limited will take such steps as are reasonable in the circumstances to correct that information, including notifying any third party to whom the information has previously been disclosed. Global Capital Property Fund Limited will not charge individuals for correcting individual's personal information. If individuals wish to have individual's personal information

deleted then Global Capital Property Fund Limited should be advised of this individual's request so that Global Capital Property Fund Limited can delete that information wherever practicable.

Where Global Capital Property Fund Limited refuses individual's request to access, amend or delete individual's personal information, Global Capital Property Fund Limited will provide individuals with reason in writing for its decision and, in the case of an amendment request, it will include a note with individual's personal information that individuals have disputed its accuracy. Global Capital Property Fund Limited's notification of the refusal will include details of the mechanisms available to individuals to complain.

#### **Anonymity and Pseudonymity**

Wherever it is not unlawful or impracticable, individuals will have the option of not identifying themselves or of using a pseudonym when dealing with the Global Capital Property Fund Limited.

#### **Trans-border Data Flows**

It is not usual to transfer personal information overseas. If personal information is transferred overseas, then Global Capital Property Fund Limited will wherever practical obtain individuals' written consent before doing so. If obtaining individuals' consent is not practicable, then the information may still be transferred if, as part of the agreement for the transfer of that information, the other organisation agrees to comply with this Privacy Policy. Global Capital Property Fund Limited will only do so if Global Capital Property Fund Limited has taken reasonable steps to ensure that the information, which it has transferred, will not be held, used or disclosed by the recipient of the information inconsistently with the Australian Privacy Principles.

#### **Complaints**

Global Capital Property Fund Limited will consider complaints made by an individual in relation to:

- a decision to refuse access to personal information the individual requests; or
- a decision not to correct personal information; and
- will respond within a reasonable period after the complaint has been served

Any response by the Global Capital Property Fund Limited is final.

#### **Changes to this Privacy Policy**

**Global Capital Property Fund Limited** reserves the right to update or make amendments to this Privacy Policy at its discretion. If you have objections to the Privacy Policy, you should not access or use the website. The current version of the Global Capital Property Fund Limited's Privacy Policy is accessible through its website, which can be found at <https://gcpfund.com.au>