

# Astro Japan Property Group

## – Privacy Policy

**Astro Japan Property Trust**  
ARSN 112 799 854

**Astro Japan Property Management Limited**  
ABN 94 111 874 563

**Astro Japan Property Group Limited**  
ABN 25 135 381 663

**Board Approval Date:** 12 March 2014

**Last Review Date:** 9 May 2017

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## 1. Background

The Astro Group is committed to protecting the privacy of its clients by complying with the requirements of the Privacy Act, including the Australian Privacy Principles. In recognition of this commitment, the Astro Group has developed this privacy policy.

In this Policy, **Astro Group** means Astro Japan Property Management Limited, Astro Japan Property Trust, Astro Japan Property Group Limited and their controlled entities.

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## 2. About this Policy

This document gives information on how we protect the personal information we hold about you. The purpose of the Astro Group Privacy Policy is to give you comfort that the personal information you provide to the Astro Group will be kept in the strictest confidence. We acknowledge that circumstances may change and our policy will be reassessed accordingly.

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## 3. Who does this Privacy Policy apply to?

This policy applies to all individuals from whom the Astro Group collects personal information in the course of its dealings with them.

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## 4. What information does this Privacy Policy refer to?

This policy refers to all of the personal information about a person collected by or available to the Astro Group. 'Personal information' means information about an identified or reasonably identifiable individual.

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## 5. What personal information does the Astro Group collect?

The personal information which the Astro Group may collect about you may include:

- contact details
- personal details
- Tax File Number, exemption reason or country residence
- employment details
- bank account details
- income details
- details relevant to the investments which you hold in the Astro Group
- information about entities in which you have an interest, either as an investor or officeholder
- details of your interactions and transactions with us, including records of any contact we have with you by telephone, email or online.

If you do not provide us with personal information which we have requested or if that information is incomplete or inaccurate, it may either prevent us providing services to you or make it difficult for us to contact you.

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## 6. Indirect collection of information

Generally, we try to collect personal information directly from you or your agents who you have authorised to provide us with such information. However, there are certain situations in which we may collect personal information about you from someone else , including public sources, our related companies, your organisation, information service providers and the parties with which we exchange information as described here.

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## 7. How will the Astro Group use your personal information?

The Astro Group may use your personal information for purposes including to:

- provide the products and services that you request;
- administer and manage the investments you hold through the Astro Group;
- respond to queries, complaints or to provide you with our general customer services;
- identify potential investment opportunities for you or providing information about products which may be of interest to you. However, we respect your right to ask us not to do this;
- verify your identity and personal information;
- maintain and update our records;
- investigate and deal with suspected and actual unlawful activity and misconduct
- protect our lawful interests; and
- facilitate any purchase or potential purchase of an interest in our business.

The Astro Group may exchange your personal information with companies within the Astro Group, and with our external service providers including mailing houses, information technology support and email suppliers.

Where the Astro Group is required or authorised by law to provide your personal information to a third party, it may do so.

The third parties to whom we disclose personal information may be located in Australia, Japan and other countries.

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## 8. Disclosure required by law

We may be requested or authorised by or under law to disclose information, for example, when we are served with a court order. We may also be required by a Government Agency to produce information and records, for example, pursuant to taxation or social security laws.

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## 9. How does the Astro Group maintain its data quality?

We take reasonable steps to ensure your personal information is accurate, complete and up-to-date. You may contact us at any time as set out below to request us to correct or update our information about you. We rely on you to notify us of any changes to your personal information. Where we decide not to make a requested correction to your personal information and you disagree, you may ask us to make a note of your requested correction with the information.

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## 10. How secure is the information the Astro Group holds?

We take reasonable steps to protect the security and integrity of your personal information. We review and update our security measures as appropriate. Our security measures may include, depending on the circumstances:

- restricting access to our computer systems and physical records to authorised persons and preventing users from accessing information they have no need to access;
- requiring employees to use unique passwords to gain access to systems. These passwords are changed regularly and their use is independently monitored;
- employing firewalls, intrusion detection systems and virus scanning tools to prevent unauthorised persons and viruses from entering our systems; and
- a security and access system in our office premises, including a security door, alarms, cameras and other physical and electronic protections; and
- other appropriate measures.

We hold personal information at our own premises and with the assistance of our service providers.

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## 11. Can you access information the Astro Group holds?

You can contact the Astro Group to request access to the personal information held by the Astro Group about you. To make a request, please put your request in writing to the Privacy Officer using the Contact Details specified below. Please provide as many details as possible about the information requested in order to help us retrieve it. We may also require proof of your identification before we can provide you with access to your personal information. We will try to provide you with access as soon as reasonably practicable. However, the law allows the Astro Group to deny access in some circumstances. We will give you reasons if we deny you access.

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## 12. How can I contact the Astro Group about privacy issues?

Privacy Officer  
Astro Japan Property Group  
Suite 1, Level 14  
50 Pitt Street  
Sydney NSW 2000  
Tel: 61 2 8987 3900  
Fax: 61 2 8987 3999  
Email: [investorrelations@astrojapanproperty.com](mailto:investorrelations@astrojapanproperty.com)

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## 13. Complaints

If an individual wishes to make a complaint, they can contact the Privacy Officer using the contact details above. We will respond to let you know who will be handling your matter and when you can expect a further response.

If an individual feels that we have not adequately dealt with their complaint, they may contact the Office of the Australian Information Commissioner at [www.oaic.gov.au](http://www.oaic.gov.au) and on 1300 363 992.

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## 14. Changes to this Policy

This is our current Policy outlining our personal information management practices. It replaces any other Privacy Policy published by us, either on the website or in hard copy, to date.

We may vary this Policy at any time and may publish the varied Policy on our website at [www.astrojapanproperty.com](http://www.astrojapanproperty.com).