

#### PRIVACY POLICY

# 1. Background and purpose

#### 1.1. Introduction

BWP Group (**we/us/our**) are committed to complying with the *Privacy Act 1988* (Cth) (which governs the privacy of personal information collected by businesses), and related legislation, and to protecting and safeguarding your privacy when you deal with us.

### 1.2. Interpretation

- a) **BWP Group** means:
  - i) the Trust and all other entities managed by the Responsible Entity and its subsidiaries; and
  - ii) BWP Property Group, the Responsible Entity and their subsidiaries.
- b) **BWP Property Group** means BWP Property Group Ltd.
- c) **Responsible Entity** means BWP Management Limited in its capacity as Responsible Entity of the Trust.
- d) **Trust** means the managed investment scheme known as the BWP Trust.

#### 2. Policy application

- a) This Policy applies in respect of all personal information collected by the BWP Group. In this Policy we explain how and why we collect your personal information, how we use it, and what controls you have over our use of it.
- b) "Personal information" is information or opinion (in recorded form or otherwise) about an identified, or reasonably identifiable, individual. This includes an individual's name, date of birth, residential address, contact details, banking details and tax file number.

#### 3. Collection of information

- a) Some information we collect from clients (including investors and prospective investors), customers, contractors and other third parties might be considered personal information. We will only collect such personal information if it is necessary for one of our functions or activities.
- b) In particular, personal information is collected from people in the following situations by the BWP Group:
  - i) if you contact the BWP Group, we may keep a record of that correspondence; and
  - ii) when you submit your e-mail address to our web site mailing list.
- c) If you are an investor or prospective investor, we may also collect your personal information:
  - i) in your application and to assess your application;

- ii) to communicate with you in relation to your holding and transactions relating to that holding; and
- iii) to identify you under the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth).
- d) We sometimes collect personal information from publicly available sources and third parties such as our security registry. Our security registry may collect personal information from users of their website on our behalf. Where such information is collected, the security registry will request the information from you directly. We recommend you review their privacy policy at this time.
- e) We may tell you more about how we handle personal information at the time we collect the information.

#### 4. Our purposes for handling personal information

We collect, hold, use and/or disclose personal information for the following purposes:

- a) provision of our services, including administration of our services, notification to you about changes to our services, record-keeping following termination of our services to you and technical maintenance;
- b) to inform clients and business parties of products and services that may be of interest to them; and
- c) to otherwise run our business.

### 5. Disclosure of personal information

We may also share your personal information with:

- a) our related entities;
- b) your solicitor or authorised representative;
- our service providers including insurers, insurance brokers, solicitors, mailing houses, accountants, management consultants, couriers, data processors, technology consultants, website developers and houses, banks and financial institutions, marketing agencies, market researchers, security firms and auditors;
- d) your investment advisers and our security registry; and
- e) any person acquiring, or considering whether to acquire, our business or any part of our business.

#### 6. Marketing

We may use our customers', investors' and other clients' and business associates' personal information, including contact details, to provide them with information about products and services, including those of third parties, which we consider may be of interest. We may do this while we have a current business relationship with you, even if you are on the Do Not Call Register. We may also disclose your details to other organisations for specific marketing purposes. **You may opt-out of direct marketing** at any time by contacting us using the contact details below or by following the method advised on any of our marketing communications.

#### 7. Security and storage

- a) The BWP Group places a great importance on the security of all information associated with our customers, clients and contractors. We have security measures in place to protect against the misuse, inference and loss, and unauthorised access, modification and disclosure of personal information under our control.
- b) Personal information is de-identified or destroyed securely when no longer required by us.
- c) The BWP Group retains the information you provide to us to enable us to verify transactions and customer details and to retain adequate records for legal and accounting purposes. This information is held on secure servers in controlled facilities.
- d) Information stored within our computer systems can only be accessed by those entrusted with authority and computer network password sanctions.
- e) Ultimately, you are solely responsible for keeping your passwords and/or account information secret. You should be careful and responsible whenever you are online.

### 8. Access to and correction of personal information

- a) The BWP Group is committed to maintaining accurate, timely, relevant and appropriate information about our customers, clients and web-site users.
- b) So long as your request to access your personal information is in accordance with the Australian Privacy Principles, then we will give you access to that information through our Privacy Officer:

Mr Mark Scatena Managing Director, BWP Property Group Brookfield Tower 2, 123 St Georges Terrace Perth WA 6000 Telephone (08) 9327 4356

E-mail: <a href="mailto:privacy@bwptrust.com.au">privacy@bwptrust.com.au</a>

- c) Inaccurate information will be corrected upon receiving advice to this effect from you. To ensure confidentiality, details of your personal information will be passed on to you only if we are satisfied that the information relates to you.
- d) If we refuse your request to access or correct your personal information we will provide you with reasons for our refusal.

### 9. Cookies

- a) A "cookie" is a small text file which is placed on your internet browser and which we access each time you visit our website. We use cookies to obtain information about how our website is being used.
- b) We generally cannot use information gathered from cookies to identify someone. You may change the settings on your browser to reject cookies.

#### 10. Inquiries and complaints

a) If you would like to know more about how we handle your personal information, please contact us at <a href="mailto:privacy@bwptrust.com.au">privacy@bwptrust.com.au</a>.

- b) If you have a complaint about how we handle your personal information, please contact us at <a href="mailto:complaints@bwptrust.com.au">complaints@bwptrust.com.au</a>.
- c) We will investigate your complaint and attempt to resolve any breach that might have occurred in relation to our handling of personal information about you in accordance with the Privacy Act. If you are not satisfied with the outcome of this procedure, then you can complain to the Office of the Australian Information Commissioner on 1300 363 992 or via <a href="www.oaic.gov.au">www.oaic.gov.au</a>.

# 11. Policy review

- a) This Policy will be reviewed periodically to check that it is operating effectively.
- b) The Company Secretary is authorised to make administrative amendments to this Policy.

# 12. Changes to Privacy Policy

If the BWP Group decides to change this Policy, it will post changes on the Privacy Policy page of the BWP Group site so that users are always aware of what information is collected, how it is used and the way in which information may be disclosed.

Approved by the Board on 16 October 2025