

Statement of Privacy Policy



Your privacy is important to us	<p>At QIC Limited, its subsidiaries and trusts (collectively referred to as QIC), your privacy is important to us. We are committed to meeting or exceeding the privacy requirements established by the Federal Government and the Queensland State Government.</p> <p>All of our personal information¹ management policies, as set out in this document, comply with the National Privacy Principles (NPPs) in Schedule 3 to the Privacy Act 1988 (Commonwealth). They also incorporate elements of the Queensland State requirements, which are set out in the Information Privacy Principles (IPPs) of Information Standard 42 (IS42), where we consider these standards contribute further to best practice.</p> <p>The subsidiaries and trusts of QIC are legally bound by the NPPs. QIC, whilst not legally bound by the NPPs or the IPPs, has decided to voluntarily adopt these policies as its benchmark for the fair handling of personal information. Our intention is to ensure consistent policies and practices relating to personal information across the whole group.</p>
Who we are	<p>QIC was established on 1 July 1991, under the provisions of the <i>Queensland Investment Corporation Act</i>, to provide superior wholesale funds management for its public sector clients and other approved organisations. QIC is a Queensland Government-owned company, which operates as a commercial enterprise and generates a return to the State Government. As permitted by its governing Act, QIC also has subsidiary companies and trusts, which are used to carry out certain activities, many related to our property investments.</p>
Further information	<p>For further information about what type of personal information we hold, for what purposes, and how it is collected, stored, used and disclosed by us, and for other related information, please refer to the document titled <i>QIC Detailed Statement of Privacy Policies</i> (available on our internet site at www.qic.com or by contacting us).</p>
Policy 1 - Collection	<p>We limit our collection of personal information to those details we identify as necessary for the lawful purposes of our business. We list these purposes in the document titled <i>QIC Detailed Statement of Privacy Policies</i>. Personal information shall only be collected by lawful and fair means, in most cases directly from the individual concerned, or his/her representative. The collection of 'sensitive information'² shall be further restricted as required by the law.</p>

¹ 'Personal information' is *information or an opinion (including information or an opinion forming part of a database) whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.*

² 'Sensitive information' is a subset of personal information. It means *information or an opinion about an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences or practices, criminal record or health.*

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Policy 2 – Informing individuals	We inform the individual, at or before the time of collection (or, if that is not practical, as soon practically possible), of the purposes for which the information is collected, to whom generally it might be disclosed, and of any other relevant details that will help the individual to ensure his/her privacy is being protected.
Policy 3 – Use and disclosure	QIC uses and discloses personal information only for the purposes identified, or when it is required or permitted by law. Information may be shared between companies within the QIC group. Disclosure between related bodies corporate is permitted under the Privacy Act 1988.
Policy 4 – Accuracy of information	QIC takes reasonable steps to keep personal information as accurate, complete, and up to date as is necessary for the purposes we have identified.
Policy 5 – Data security and retention	QIC protects personal information with appropriate safeguards and security measures. Personal information is only retained for as long as it is necessary for the identified purposes.
Policy 6 - Access	QIC will give an individual access to the personal information we hold about him/her unless the request is frivolous, vexatious or there are other lawful reasons to restrict such access under National Privacy Principles. If the individual is denied access to the personal information, we shall provide reasons for the denial. For further details on how to obtain access to the personal information, please refer to the document titled <i>QIC Detailed Statement of Privacy Policies</i> .
Policy 7 – Correction	Individuals may verify whether the personal information we hold about them is accurate, complete and up to date and request that it be amended if necessary.
Policy 8 – Disagreement	In the event that QIC disagrees with an individual's claim that information is not accurate, complete or up to date, we will provide reasons for our disagreement. The individual's written notice of his/her claim will then form part of the information.
Policy 9 - Commonwealth identifiers³	QIC will not adopt a Commonwealth agency identifier as its own identifier.
Policy 10 – Openness	Information concerning the policies and practices that govern the management of personal information within QIC is available to anyone who asks.

³ *identifier* includes a number assigned by an organisation to an individual to identify uniquely the individual for the purposes of the organisation's operations. However, an individual's name or ABN (as defined in *A New Tax System (Australian Business Number) Act 1999*) is not an *identifier*.



Detailed Statement of Privacy Policies

Introduction At QIC Limited, its subsidiaries and trusts (collectively referred to as QIC), we respect the individual's right to privacy. Whilst doing business with QIC may necessarily involve providing information about yourself, we ensure that your privacy is protected.

This document is intended to provide general information about what type of personal information we might hold, for what purposes, and how it is collected, stored, used and disclosed by QIC. It also provides other practical information and should be read in conjunction with the QIC Statement of Privacy Policies.

The types of individuals about whom personal information⁴ may be maintained Being a wholesale funds manager, we do not collect or hold personal information in relation to individual members of funds or policies that invest with us. Due to the nature of our business, the types of individuals that we may maintain personal information about is limited to the following:

- key individuals employed by our investment clients or their representatives
- tenants or key individuals associated with the corporate tenants of our various retail and commercial properties
- potential employee candidates
- industry related contacts and other individuals interested in QIC or the industry
- key individuals who supply (or are employed by organisations that supply) goods or services to QIC – this includes those who facilitate our investment transactions.

The types of personal information that may be maintained	Type of individual	Main types of information
	Key individuals employed by our investment clients or their representatives	Business and personal contact details, family information (such as name of spouse/partner, and details of children), social preferences (information which enables us to tailor events and entertainment), special dietary information
	Tenants or key individuals associated with the corporate tenants of our various retail and commercial properties	Financial and contact details
	Potential employee candidates	Employment history, experience, qualifications, and contact details

⁴ 'Personal information' is information or an opinion (including information or an opinion forming part of a database) whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.

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Industry-related contacts and other individuals interested in QIC or the industry	Contact details (including job title and name of their organisation) only
Key individuals who supply (or are employed by organisations that supply) goods or services to QIC – this includes those who facilitate our investment transactions	Contact details and possibly bank account details (where financial transactions are undertaken) only

The only type of sensitive information⁵ that we may have on file is in relation to the individual's membership of a professional or trade association.

The identified purposes for which personal information is used or disclosed

Type of individual	Identified purposes
Key individuals employed by our investment clients or their representatives	Client relationship management, business development, seminars and other client events, and for the conduct of daily business operations
Tenants or key individuals associated with the corporate tenants of our various retail and commercial properties	Leasing negotiations, decisions and documentation, operational tenancy communications, and sale of premises
Potential employee candidates	Assessment for suitability for a current or future position
Industry related contacts and other individuals interested in QIC or the industry	Distribution of newsletters and other publications to provide regular information about the views and operations of QIC
Key individuals who supply (or are employed by organisations that supply) goods or services to QIC – this includes those who facilitate our investment transactions	In relation to the supply of the goods and services and to facilitate the credit and payment arrangements

Who we may The QIC group, its employees and service suppliers are all governed by strict standards

⁵ 'Sensitive information' is a subset of personal information. It means *information or an opinion about an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences or practices, criminal record or health.*



share the information with

and policies to ensure your information is secure and treated with the utmost care and respect.

At QIC, personal information is strictly confidential. We will only share information within the QIC group or with suppliers who perform services for us or on our behalf. The only exception to this is where relevant information is provided to a potential buyer in the sale of a property (refer appropriate section below).

Within the QIC group

Personal information is only shared within the group for management and operational purposes as identified in the appropriate section above. Disclosure between related bodies corporate is permitted under the Privacy Act 1988.

Our employees

In the course of daily operations, access to private, sensitive and confidential information is restricted to authorised employees who have a legitimate business purpose and reason for accessing it.

As a condition of their employment, all QIC employees are required to abide by the privacy standards we have established. They are also required to work within the principles of ethical behaviour as set out in our internal Code of Ethics and must follow all applicable laws and regulations. Employees are well informed about the importance of privacy and they are required to adhere to either a Code of Conduct or a confidentiality agreement that prohibits the disclosure of any client information to unauthorised individuals or parties. To reinforce their understanding and commitment to upholding privacy and confidentiality, employees periodically receive up-to-date literature about our privacy policy, principles and standards.

Unauthorised access to and/or disclosure of client information by an employee is strictly prohibited. All employees are expected to maintain the confidentiality of personal information at all times and failing to do so will result in appropriate disciplinary measures, which may include dismissal.

Outside service suppliers

At QIC, we sometimes contract outside organisations to perform specialised services, such as property management. Our trusted service suppliers may at times be responsible for collecting, handling and storing some of the information we receive from you.

When we contract our suppliers to provide specialised services, they are given only the information necessary to perform those services. When we select the service provider, we do so carefully. We either confirm that it uses privacy standards that comply with the National Privacy Principles or we seek assurances that the information will not be used or disclosed for a purpose other than the purpose for which it was disclosed to them.

Potential buyer of a property

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In the process of assessing the financial attractiveness of a property, a potential buyer will usually need to review our relevant documentation, which may contain personal information. We only give access to such information after the potential buyer signs a confidentiality agreement or where we have taken reasonable steps to obtain assurances that the information will not be used or disclosed for a purpose other than the purpose for which it was disclosed to them.

How the information is usually collected

Type of Individual	Usual Method of Collection
Key individuals employed by our investment clients or their representatives	Verbally, directly from the individual or personal assistant / secretary
Tenants or key individuals associated with the corporate tenants of our various retail and commercial properties	Leasing documentation and communications with tenant / lessor and solicitors
Potential employee candidates	Resumes received from applicants in response to positions advertised, or unsolicited resumes
Industry related contacts and other individuals interested in QIC or the industry	Directly from the individual, either verbally or via a form for updating details
Key individuals who supply (or are employed by organisations that supply) goods or services to QIC – this includes those who facilitate our investment transactions	From the individual directly, usually verbally or from transaction documentation

How the information is stored

Information that is stored electronically is kept in a highly secure network environment. Due to its nature, some of the personal information we use (for example tenant leasing files) is kept as hardcopy records, and are stored in locked filing cabinets and/or secure areas. In both of these cases, access is restricted to those who have a legitimate business purpose and reason for accessing it.

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The period for which personal information is kept

Type of individual	Period information kept
Key individuals employed by our investment clients or their representatives	Until the individual is no longer employed by the client, or until the client ends its relationship with QIC
Tenants or key individuals associated with the corporate tenants of our various retail and commercial properties	Until the tenancy relationship ends or the information is no longer needed for QIC's bona fide investment processes or to satisfy any legal or tax requirements
Potential employee candidates	Usually for up to six months, but may be held for a longer period depending on the qualifications and experience of the candidate
Industry related contacts and other individuals interested in QIC or the industry	Until the individual instructs us that they no longer wish to be sent our publications
Key individuals who supply (or are employed by organisations that supply) goods or services to QIC – this includes those who facilitate our investment transactions	Until the individual or organisation no longer supplies goods or services to QIC

The persons entitled to access the personal information

An individual, or his/her authorised representative, is entitled to access personal information relating to that individual. Identification may be required to ensure the person requesting information is entitled to access it.

The steps that a person should take to access and amend the information

At QIC, decisions and actions taken may be made on the basis of personal information in our possession. Therefore, it is important that your personal information is accurate, complete, and up to date. You are therefore welcome to access and verify the information we have about you.

The first step is to request access to the information through your usual QIC contact, eg Client Services Manager, Property Investment Manager, or Manager Human Resource Services. We may ask you to put your request in writing and supply appropriate identification. If the request fulfils the outlined requirements, we will give you access to the information in a mutually agreed format (in many cases this will be by directly viewing the original, or a copy, of the documentation on file).

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If you believe that any part of the information is not accurate or complete, you can request us to amend it accordingly. Again, we may ask you to put your request in writing. If we are reasonably satisfied that our records need amendment, we will make the amendment as soon as possible. If we do not agree that our records need amendment, we will inform you of the reason(s) and you may require us to keep a statement on our records that you believe the information is not accurate, complete or up to date.

Information collected prior to 21 December 2001

QIC has adopted the date of 21 December 2001 as the date from which it will comply with the QIC Limited Privacy Policies (consistent with the commencement date of the National Privacy Principles).

In addition to this, these policies will also apply to information collected prior to 21 December 2001, with the exceptions of policies 1 (limiting collection to what is necessary) and 2 (informing individual at time of collection) because these relate to processes which cannot be changed in retrospect.

Resolving Complaints

If you have any questions, concerns or complaints about the treatment of your personal information, the first step is to discuss the issue with your usual QIC contact, eg Client Services Manager, Property Investment Manager, or Manager Human Resource Services. They have the decision-making authority to resolve most concerns.

If your concerns have not been resolved to your satisfaction, please contact our Privacy Compliance Officer on (07) 3360 3922 or by email at privacy@qic.com.au. We may request that you put your query in writing.

If after contacting our Privacy Compliance Officer your concerns remain unresolved, we recommend you contact either:

1. If your concern is about one of our subsidiaries or trusts; the central office of the Federal Privacy Commissioner in Sydney on 1300 363 992 (for the cost of a local call anywhere in Australia), or by email on privacy@privacy.gov.au, or you can also visit their website at www.privacy.gov.au; or
2. If your concern is about QIC; being a Queensland Government-owned company, an appropriate point of contact will be the Office of Government Owned Corporations on (07) 3225 8862, or you can also visit their website at www.ogoc.qld.gov.au.