

Australian Privacy Policy

JLL

and

LaSalle Investment Management

Date of Implementation: from 12 March 2014

Table of Contents

1	Background.....	3
2	What is your personal information?.....	3
3	What personal information do we collect and hold?	3
4	How do we collect your personal information?.....	4
5	Cookies	4
6	What happens if we can't collect your personal information?	4
7	For what purposes do we collect, hold, use and disclose your personal information?	5
8	To whom may we disclose your information?	6
9	Direct marketing materials	6
10	How can you access and correct your personal information?	6
11	What is the process for complaining about a breach of privacy?.....	7
12	Do we disclose your personal information to anyone outside Australia?	7
13	Links	7
14	Contacting us.....	8
15	Changes to our privacy policy	8

1 Background

JLL and LaSalle Investment Management and their Australian related bodies corporate (**we, our, us**) recognise the importance of protecting the privacy and the rights of individuals in relation to their personal information. This document is our Australian privacy policy and it tells you how our Australian entities collect and manage your personal information.

We respect your rights to privacy under the *Privacy Act 1988* (Cth) (**Act**) and we comply with all of the Act's requirements in respect of the collection, management and disclosure of your personal information.

2 What is your personal information?

When used in this privacy policy, the term "personal information" has the meaning given to it in the Act. In general terms, it is any information that can be used to personally identify you. This may include your name, address, telephone number, email address, profession or occupation and images or photographs. If the information we collect personally identifies you, or you are reasonably identifiable from it, the information will be considered personal information.

3 What personal information do we collect and hold?

We may collect the following types of personal information:

- name;
- mailing or street address;
- email address;
- telephone number;
- facsimile number;
- age or birth date;
- profession, occupation or job title;
- details of the products and services you have purchased from us or which you have enquired about, together with any additional information necessary to deliver those products and services and to respond to your enquiries;
- any additional information relating to you that you provide to us directly through our websites or indirectly through use of our websites or online presence, through our representatives or otherwise; and
- information you provide to us through our service centre, customer surveys or visits by our representatives from time to time.

We may also collect some information that is not personal information because it does not identify you or anyone else. For example, we may collect anonymous answers to surveys or aggregated information about how users use our website or our computer applications.

4 How do we collect your personal information?

We collect your personal information directly from you unless it is unreasonable or impracticable to do so. When collecting personal information from you, we may collect in ways including:

- through your access and use of our website;
- during conversations between you and our representatives;
- when you complete an application or purchase order;
- when you enter competitions that we hold; or
- when you complete a form requesting articles/updates from us.

We may also collect personal information from third parties such as credit reporting agencies, law enforcement agencies and other government entities.

5 Cookies

In some cases we may also collect your personal information through the use of cookies (these being small summary files containing a unique 10 digit number). When you access our website, we may send a cookie to your computer. This enables us to recognise your computer and greet you each time you visit our website without bothering you with a request to register. It also enables us to keep track of products or services you view so that, if you consent, we can send you news about those products or services. We also use cookies to measure traffic patterns, to determine which areas of our website have been visited, and to measure transaction patterns in the aggregate. We use this to research our users' habits so that we can improve our online products and services. If you do not wish to receive cookies, you can set your browser so that your computer does not accept them.

We may log IP addresses (that is, the electronic addresses of computers connected to the internet) to analyse trends, administer our websites, track users movements, and gather broad demographic information.

6 What happens if we can't collect your personal information?

If you do not provide us with the personal information described above (including by use of computer settings which do not permit acceptance of cookies), some or all of the following may happen:

- we may not be able to provide to you products or services that you have requested, either to our usual standard or at all;
- we may not be able to provide you with information about products and services that you may want, including information about discounts, sales or special promotions; or

- we may be unable to tailor the content of our websites to your preferences and your experience of our websites may not be as enjoyable or useful.

7 For what purposes do we collect, hold, use and disclose your personal information?

We collect personal information about you so that we can perform our business activities and functions and to provide the best possible quality of customer service.

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

- to provide products and services to you and to send communications requested by you;
- to answer enquiries and provide information or advice about existing and new products or services;
- to provide you with access to protected areas of our websites and our computer applications (“apps”);
- to assess the performance of our websites and our apps, and to improve the operation of our websites and our apps;
- to conduct business processing functions including providing personal information to our related bodies corporate, contractors, service providers or other third parties;
- for the administrative, marketing (including direct marketing), planning, product or service development, quality control and research purposes of JLL and LaSalle Investment Management, their related bodies corporate, contractors and service providers;
- to provide your updated personal information to our related bodies corporate, contractors and service providers;
- to update our records and keep your contact details up to date;
- to process and respond to any concerns or complaints you raise; and
- to comply with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or in co-operation with any governmental authority of any country (or political sub-division of a country).

Your personal information will not be shared, sold, rented or disclosed other than as described in this Privacy Policy.

8 To whom may we disclose your information?

We may disclose your personal information to:

- our employees, related bodies corporate, contractors or service providers for the purposes of operation of our websites or our business, fulfilling requests by you, and to otherwise provide products and services to you including, without limitation, web hosting providers, IT systems administrators, registry providers, mailing houses, couriers, payment processors, data entry service providers, electronic network administrators, debt collectors, and professional advisors such as accountants, solicitors, business advisors and consultants;
- suppliers and other third parties with whom we have commercial relationships, for business, marketing, and related purposes; and
- any organisation for any authorised purpose with your express consent.

We may combine or share any information that we collect from you with information collected by any of our related bodies corporate within and outside Australia.

9 Direct marketing materials

We may send you direct marketing communications and information about our products and services that we consider may be of interest to you. These communications may be sent in various forms, including mail, SMS, fax and email, in accordance with applicable marketing laws, such as the *Spam Act 2003* (Cth). If you indicate a preference for a method of communication, we will endeavour to use that method whenever practical to do so. In addition, at any time you may opt-out of receiving marketing communications from us by contacting us (see the details below) or by using opt-out facilities provided in the marketing communications and we will then ensure that your name is removed from our mailing list.

We do not provide your personal information to other organisations for the purposes of direct marketing.

10 How can you access and correct your personal information?

You may request access to any personal information we hold about you at any time by contacting us (see the details below). If we hold information that you are entitled to access, we will try to provide you with suitable means of accessing it (for example, by mailing or emailing it to you). We may charge you a fee to cover our administrative and other reasonable costs in providing the information to you. We will not charge for the making of the request and we will not charge for our making any corrections to your personal information.

There may be instances where we cannot grant you access to the personal information we hold. For example, we may need to refuse access if granting access would interfere with the privacy of others or if it would result in a breach of confidentiality. If that happens, we will give you written reasons for any refusal.

If you believe that personal information we hold about you is incorrect, incomplete or inaccurate, then you may ask us to amend it. Upon any such request, we will consider whether the information requires

amendment. If we do not agree that there are grounds for amendment then we will add a note to the personal information stating that you disagree with it.

11 What is the process for complaining about a breach of privacy?

If you believe that your privacy has been breached, please contact us and provide as much detail as possible about your concern so that we can fully investigate it.

Our procedure for dealing with privacy breaches is:

- your usual JLL / LaSalle Investment Management contact will discuss your concerns with you;
- if your concerns are not resolved to your satisfaction, one of our designated Privacy Officers will further discuss your concerns with you; and
- if your concerns still remain unresolved, we will suggest you contact the Office of the Australian Information Commissioner on 1300 363 992 or by email at enquiries@oaic.gov.au.

12 Do we disclose your personal information to anyone outside Australia?

We may disclose personal information to our related bodies corporate and third party suppliers and service providers located overseas for some of the purposes listed above.

We take reasonable steps to ensure that the overseas recipients of your personal information do not breach the privacy obligations relating to your personal information.

We may disclose your personal information to entities located outside of Australia, including the following:

- our related bodies corporate, located in the Asia Pacific region, United States of America, the United Kingdom, and Europe;
- our data hosting and other IT service providers, located in the United States of America; and
- other third parties located in the Asia Pacific region and the United States of America.

13 Links

Our websites may contain links to other websites operated by third parties. We make no representations or warranties in relation to the privacy practices of any third party website and we are not responsible for the privacy policies or the content of any third party website. Third party websites are responsible for informing you about their own privacy practices.

14 Contacting us

If you have any questions about this privacy policy, or any concerns or complaints regarding the treatment of your privacy or a possible breach of your privacy, please use the contact link on our website or contact one of our Privacy Officers using the details set out below.

We will treat your requests or complaints confidentially. You will be contacted within a reasonable time after receipt of your complaint to discuss your concerns and outline options regarding how they may be resolved. We will aim to ensure that your complaint is resolved in a timely and appropriate manner.

Please contact our Privacy Officers at:

austprivacyqueries@ap.jll.com

15 Changes to our privacy policy

We may change this privacy policy from time to time. Any updated versions of this privacy policy will be posted on our website.

This privacy policy was last updated on 12 March 2014.