



Title Capital Privacy Policy

Title Capital (part of the ID_Corp Group) takes protecting its customers privacy rights seriously, and is committed to being open and transparent about how it manages and protects personal information, in compliance with privacy laws.

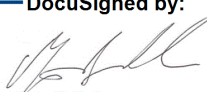
- Under the Privacy Act 1988 (Cth) (the **Privacy Act**), Title Capital is legally obliged to protect and manage personal information in accordance with a set of detailed rules called the Australian Privacy Principles (**APPs**).
- The Privacy Act imposes very serious penalties for breaching the APPs, but more importantly, any privacy breach could cause enormous damage to the reputation of Title Capital's brand and business.
- It is therefore critically important that as staff members, you familiarise yourselves with the APPs and do everything you can to help Title Capital comply with its obligations.
- You need to read and understand this Title Capital Privacy Policy (published on Title Capital's website) which provides more detail about the personal information that Title Capital collects, uses, discloses, stores and otherwise handles including through our network of websites, third-party social media platform (such as LinkedIn in connection with our recruitment and HR processes) and through the various activities conducted by Title Capital's business unit.

In line with the privacy regulator's, the OAIC, guidance, this Privacy Policy intended to:

- be a clearly expressed, up-to-date and publicly available privacy policy that includes all mandatory information required under APP 1, including:
 - the kinds of personal information collected and held by Title Capital;
 - how personal information is collected and held;
 - the purposes for which personal information is collected, held, used and disclosed by Title Capital;
 - how an individual may access their personal information and seek its correction;
 - how an individual may complain if the entity breaches the APPs, and how the complaint will be handled;
 - whether Title Capital is likely to disclose personal information to overseas recipients, and if so, the countries in which such recipients are likely to be located;
- reflect Title Capital's information handling processes, not just one business unit's;
- be followed by all staff members (including, for example, how to handle privacy complaints); and
- be regularly updated to reflect changes to how Title Capital handles personal information.

Escalation points

- If you receive a privacy complaint or request to access or correct personal information from a customer/third-party, you must promptly report it to the General Counsel
- Further, if you notice a mistake in this Privacy Policy, for example, a category of personal information that your business unit collects from customers is not listed in the table, please ensure you inform the General Counsel.

DocuSigned by:

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Mathew Belford, Managing Director
1 October 2026



Title Capital Privacy Policy

Last updated 1 September 2026

1. Title Capital's commitment to privacy

- 1.1 Title Capital is committed to managing personal information in accordance with the *Privacy Act 1988* (Cth) (**Privacy Act**) and the Australian Privacy Principles under the Privacy Act (**Privacy Laws**).
- 1.2 We understand the importance of being open and transparent with you in the way in which we collect, hold, store, use and share your personal information. We take protecting your privacy rights very seriously.
- 1.3 This document sets out how we handle and protect your personal information, and provides information on your rights in relation to your personal information that is managed by Title Capital. This document is referred to as our **Privacy Policy**.
- 1.4 We strongly encourage you to read this document, so that you understand and are comfortable with how we handle your personal information. If you have any questions about this policy, or about Title Capital's handling of your personal information, please contact us using the relevant contact details set out in section 16.

2. About Title Capital

- 2.1 Title Capital Pty Ltd (ACN 642 044 264) (**Title Capital**) is part of the ID_Corp Group of companies, a group of unrelated entities including ID_Corporation Pty Ltd (ACN 644 183 522), ID_Land Pty Ltd (ACN 129 819 626), ID_Real Estate Pty Ltd (ACN 155 717 543), Next Living Communities Pty Ltd (ACN 662 412 991), Shape Homes Pty Ltd (ACN 619 008 874) and their related bodies corporate (as defined in the *Corporations Act 2001* (Cth)), as well as any other development entities created from time-to-time by another entity in the ID_Corp Group (together, the **ID_Corp Group**) for the purpose of a new development project.
- 2.2 The ID_Corp Group is committed to building connected, liveable and vibrant communities for Australian families, with its multi-billion dollar portfolio spanning property development and construction. Title Capital is the funds management division of the ID_Corp Group. Title Capital has its own Australian financial services licence (**AFSL**) and is also committed to its compliance obligations under its financial services licence.
- 2.3 Through Title Capital, the ID_Corp Group manage capital investments into the ID_Land projects, drawing on the ID_Corp Group's high return portfolio and industry expertise to identify and manage investment opportunities across land, medium density and apartment assets, Australia-wide. Title Capital has its own Australian financial services licence (**AFSL**). In conducting this business, Title Capital may collect personal information.



3. When does this Privacy Policy apply?

- 3.1 This Privacy Policy only applies to the handling of personal information by Title Capital and its related bodies corporate and associate entities (as defined in the *Corporations Act 2001* (Cth)).
- 3.2 Title Capital is excluded from the ID_Corp Group for the purpose of this Privacy Policy. The handling of personal information by the ID_Corp Group is dealt with in a separate privacy policy. If applicable to you, please see the ID_Corp Group's group-wide privacy policy, available <https://www.idland.com.au>.

4. About this Privacy Policy

- 4.1 This document sets out our policies for managing your personal information and is referred to as our Privacy Policy.
- 4.2 In this Privacy Policy:
- “**we**”, “**us**” and “**our**” refers to Title Capital;
 - “**you**” and “**your**” refers to any individual about whom we collect personal information; and
 - “**Development**” means a residential or other real estate project or development undertaken by the ID Corp Group.
- 4.3 This Privacy Policy sets out how we collect, store, process, use and disclose personal information (including personal information we collect, and personal information submitted to us, whether offline or online). For example, this may include information we collect from you:
- as an investor or prospective investor in a fund in relation to a property or Development project;
 - as a supplier to us;
 - when you apply for a job with us; or
 - when you otherwise interacted with us, including by:
 - attending our office;
 - asking us to send you information about ID_Corp Group Developments or other investment-related services;
 - opting in to hear from us on corporate news and/or investment opportunities;
 - sending us an enquiry or providing us with feedback; or
 - visiting our website at <https://titlecapital.com.au/#> (**Website**).
- 4.4 Title Capital will regularly review its policies and procedures regarding personal information and may therefore update and amend this Privacy Policy from time to time, with or without notice to you. However, where we make a material change to this Privacy Policy, we will provide notice to you (including by updating our Website, and, where appropriate, notifying you directly).

- 4.5
- Any updated privacy policy will be made available on our Website or can otherwise be obtained by contacting us and requesting a copy. We recommend that you visit this Privacy Policy regularly to keep up to date with any changes we make.
- 4.6
- Other privacy related notices and terms and conditions may apply to you, such as a privacy collection notice provided:
- when your register interest to invest in a specific Development;
- by either us or your authorised representative or financial planner when you agree to invest in a fund managed by us;
- when you subscribe to receive news and updates via our Website; and
- when you apply for a role with us or accept a position working for us.

5. What is personal information?

- 5.1
- “Personal information” is defined in the Privacy Act, and means information or an opinion about an identified individual, or an individual who is reasonably identifiable:
- whether the information or opinion is true or not; and
- whether the information or opinion is recorded in a material form or not.
- 5.2
- In this Privacy Policy, whenever we use the term “personal information”, we are referring to this legal definition.
- 5.3
- Personal information does not include:
- aggregated or de-identified data;
- information about the specifications of a property; or
- if you are a financial advisor, accountant, authorised representative or supplier, your business information that does not identify a person or reasonably identify you (i.e. in certain circumstances, your business payment details).

6. What kinds of personal information do we collect about you and how do we collect this information?

- 6.1
- The types of personal information that we collect about you will depend on the type of dealings you have with us.
- 6.2
- Generally speaking, the kinds of personal information Title Capital collects may include:

Type of personal information	What this includes	How/when do we collect this information?
Personal and contact details	This may include your: – full name; – address; – telephone number; – email address;	We may collect this information directly from you in person or via our Website: – during our interactions with you; – when you submit an “Enquire Today” form or otherwise make an enquiry;

	– date of birth; and/or – gender.	– when you register to receive updates about one of our investment opportunities or a Development; – when you otherwise subscribe to receive information from us including our newsletters or join our mailing list; – when you contact us via our online forms, email, phone or social media (including LinkedIn); – when you complete a survey or enter a trade promotion or competition conducted by us; – when you visit a property or premises owned or occupied by us, such as our offices, one of our Developments or a showroom connected with one of our Developments; – if you apply for a position at Title Capital; or – when you otherwise interact with us on a commercial basis, including as a supplier to us. We may also collect this information about you indirectly from third parties, for example: – entities in the ID_Corp Group; – financial advisor or your authorised representative with whom you register your interest in investing in a Title Capital fund; or – other third parties who are involved in the marketing and, promotion of our investment opportunities.
Workplace information	This may include: – details of your employment history; – information about your education, qualifications and certifications; – details of any skill-specific licences you hold; – your tax file number; – your working eligibility rights; – your suitability for the role you are applying for; – details about your referees; – health information and incident reports - <u>this may include sensitive information</u>; and/or – other information provided as part of our recruitment process.	We may collect this information through our recruitment process when you apply for a position with us, or otherwise during your employment.
Background check information	Including national police check information (if applicable) – <u>this may include sensitive information, such as if you have a criminal record</u>	We may collect this information directly from you through our recruitment process, when you apply for a position with us, or otherwise during your employment. We may also collect this information:

		– from third parties (for example, verification providers, referees, previous employers, professional registration authorities, or our contractors that employ you); and/or – publicly available information (for example, court decisions).
Proof of identity information	This may include: • your passport; • your driver's licence; • your nationality; • your visa (if applicable); • your tax file number; and/or • other similar identity information.	We may collect this information directly from you if you are an investor or prospective investor in a Development fund we manage, or if you are a job applicant or employee. We may also collect this information about you indirectly from third parties, for example, financial advisors you have engaged to assist with your investment in a Development fund.
Transactional and payment information	This may include: • your bank account or credit card details.	We may collect this information: – if you enter into, or propose to enter into, a transaction with us, including investment in one of our Development funds; or – during your employment with us.
Financial information and circumstances	This may include information about your: • financial circumstances and objectives; • assets; • income; • liabilities and expenditure; • bank account details and transaction history; and/or • investment preferences.	We may collect this information if you enter into, or propose to enter into, a transaction with us, including investment in connection with one of our Developments. We may also collect this information about you indirectly from third parties, for example: – financial advisors with whom you register your interest in investing in a Title Capital project or Development; – your other representatives, including your lawyers, financiers, accountants or other authorised agents; or – other third parties such as financial service providers.
Call recording / CCTV information	Title Capital may collect call recordings and CCTV footage.	We may collect call recording information from calls that you make to Title Capital, noting that you will always be advised of the call recording in advance if applicable. We may collect CCTV footage of you from CCTV surveillance systems that monitor our premises, such as our corporate offices, when you enter such locations.
Information required to be collected by law	Title Capital may also hold other kinds of personal information as permitted or required by law.	We may collect this as required, including to comply the <i>Corporations Act 2001</i> (Cth) and our obligations as an AFSL holder.

Publicly available information	Information that is publicly available online, such as on online forums, websites, and social media channels (for example, information that relates to a complaint, ASIC search results, etc).	We may collect this directly from the publicly available source (e.g. ASIC, online forums, websites, or social media channels).
Other types of information collected during our interactions	This may include information that you provide us so that we can provide you with information regarding investment opportunities and related services, or so that we can undertake transactions or dealings with you.	We may collect this information: • when you request information about a Development, investment opportunity or related services from us; • when you attend an event conducted by us; • when you submit a form via the Website; • if you post information to any of our social media sites, or interact with us on social media; • when you make an enquiry, provide feedback, or make a complaint (via phone, email or in person); and • in your responses to customer satisfaction, service development, research surveys and similar activities.
Company information	This may include: – company information such as a company's ABN or ACN and director details; – ASIC search results; and/or – information about your company's employees, contractors or suppliers.	We may collect this information from you as part of our supplier onboarding process if you are a current or prospective supplier, or from publicly available sources such as ASIC.
Online and digital services information	This may include information (that is not always identifiable) about your: – network and device information (such as your device ID, type and IP address); – geo-location information; – browsing information, including information about how you interact with our Websites, pages you visit, what content you viewed and your session duration; – web form inputs such as your name, address, email address and phone number; – transaction data and/or – information collected from cookies and/or tracking pixels Please see 12 below for further information on the digital information we collect and when it may become personal information.	We may collect this information when you use our Websites, via use of online behavioural tracking technologies such as cookies and/or tracking pixels. For further information, see section 12.

Unsolicited information	Unsolicited personal information is personal information we receive that we have taken no active steps to collect (for example, an employment application sent to us by an individual on their own initiative, rather than in response to a job advertisement).	We may collect this information directly from you. Please note that we may keep records of unsolicited personal information to the extent that it is permitted by the Privacy Act (for example, if the information is reasonably necessary for one or more of our functions or activities). If not, we will destroy or de-identify the information as soon as practicable, provided it is lawful and reasonable to do so.
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- 6.3 Title Capital may also collect other kinds of personal information that we notify you of at the time of collection.
- 6.4 Generally, we do not collect sensitive information about individuals, except where we collect relevant information from employees, such as health information (as set out above) so that we can support you better. Information about your health, racial or ethnic origin, political affiliations, criminal record and religious or philosophical beliefs are all examples of sensitive information. If we do need to collect sensitive information about you, we will only do so with your consent or where we are required or permitted to do so by law.
- 6.5 In some cases, you may provide us with personal information which relates to another person (for example, an emergency contact, prospective investor (if you a financial advisor or other authorised representative) or a job referee). If you do so, you agree that you have received permission from these individuals for us to collect, use, and disclose their personal information in accordance with this Privacy Policy. You should also let them know about our Privacy Policy (including the information in this Privacy Policy).

7. Can you deal with us without providing your personal information?

- 7.1 You are under no obligation to provide your personal information to Title Capital. We will provide individuals with the option of not identifying themselves, or of using a pseudonym, when dealing with us if it is lawful and practicable to do so. A pseudonym is a name or other descriptor that is different to an individual's actual name. For example, you can access our Website, make general phone queries or email us without having to identify yourself.
- 7.2 However, without certain information from you, Title Capital may not be able to provide you with information about our investment opportunities and Developments that is tailored to your requirements and needs, or provide other services, and we may generally be limited in how we can interact with you.

8. Why we collect, store and use your personal information

- 8.1 Generally speaking, Title Capital collects and uses personal information so that we can develop, manage, improve and promote our Development investment funds and financial related services and so we can conduct our business].
- 8.2 Also from an overarching perspective, we are required to collect the following information to enable us to comply with our legal obligations under the including the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 and other related laws (**AML CTF Laws**).
- 8.3 We may also use your personal information for purposes which are incidental to the development, management, improvement and promotion of our funds and investment opportunities, or for other purpose which are within your reasonable expectation or permitted by law.

- 8.4 The purpose for which we usually collect, store, and use your personal information depends on how you interact with us (for example, whether you are an employee or potential investor), but may include the following purposes:

Purpose	Explanation
To fund Developments and manage your investment, or provide you with other financial services	We may handle your personal information to: • verify your identity; • communicate with you, including by phone, email, or mail, generally as well as about projects or Development you have enquired about, new investment opportunities and corporate marketing (in accordance with the “Do we use your information for direct marketing” section below); • provide you with updates on your investments with us, return, and the construction of Developments you have invested in; • respond to your queries and provide you with products, services and information you request from us; • carry out our obligations arising from any contracts we enter into with you; • enforce the terms of any contract that you enter into with us relating to our products and services; • administer, manage and process any transactions you enter into, or propose to enter into, with us, including investment into Development fund, any applicable payments, our billing and account purposes or otherwise in connection with your investment; • help us to manage the financial services we provide to you, including personalising your experience; • keep our records accurate, complete and up-to-date; • conduct trade promotions, competitions, giveaways and events; • manage our relationship with you, including by resolving complaints or improving our customer service; and/or • comply with our legal and regulatory obligations including notifying you of matters that we may be required by law to notify you of, and generally complying with the conditions and obligations of our AFSL.
To manage your working relationship with us (including if you are an employee or contractor)	We may handle your personal information to: • verify your identity; • recruit employees and contractors; • consider your suitability as a prospective employee or contractor; • manage our working relationship with you; • investigate incidents (including potential incidents) which occur on our premises; and • collect, store and use your personal information for administration and management purposes.
To do business with you	We may collect, store and use your personal information if you interact with us on a commercial basis (such as if you are a service provider, financial advisor or brokerage firm or supplier to us), or if you otherwise interact with us on a commercial basis.
To manage and improve our operations and business	We may collect, store and use your personal information to: • obtain finance for our Developments; • conduct the general operation and management of Title Capital and to supply our services to you; • train staff (including IT, development, legal and finance teams); • maintain appropriate work, health and safety standards at our premises; • test and maintain information technology systems;

	• protect the security of our offices, employees, customers and the property held on our premises; • administer our Website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes; and • manage payments and debt recovery.
To create de-identified or aggregate data for data analytics	We may collect, store and use your personal information to create deidentified or aggregate data sets (which is no longer personal information). We do this by de-identifying or aggregating your information such as combining your information with information we have about our other customers, for example investment information, and with data we obtain from other sources. We use this deidentified or aggregate data to assist with our business decisions, such as to: • help us in understanding trends in customer behaviour (such as the success of our Development funds, and our different marketing campaigns); • create look-a-like audiences for the purposes of providing targeted advertising to other customers; • perform research and statistical analysis, including for customer satisfaction and service improvement purposes; • improve the financial products and services we offer; and • design, and develop new Development funds that better meet our customers' investment preferences and behaviours.
To assist with any business, share sale or corporate restructure	We may collect, store and use your personal information for the purpose of facilitating or implementing a transfer or sale of all or part of our assets or business or if we or the ID_Corp Group undergo any other kind of corporate restructure, acquisition or sale.
To comply with legal and regulatory obligations	We may collect, store and use your personal information for the purpose of complying with our obligations under any applicable laws and regulations, including privacy laws and our regulation as an AFSL holder.

8.5 In addition to the purposes listed above, Title Capital may use your personal information for other purposes which we notify you of when we collect your personal information and for purposes otherwise permitted or required by law.

8.6 Title Capital only uses and discloses your personal information for the purpose for which it was collected, including related secondary purposes as permitted by privacy laws.

9. Who do we share your personal information with and why?

9.1 Title Capital may share your personal information with third parties:

- for the purpose for which we collect it, as set out in section 8 of this Privacy Policy;
- for other purposes, if we notify you of such when we collect the information; or
- where we have otherwise received your consent, or the disclosure is required or authorised by law, such as the AML CTF Laws.

9.2 Some of the third parties we may share your personal information with includes the following:

Recipient

Explanation

Members of the ID_Corp Group (including both related and unrelated entities as described above at 2)	We may share your personal information with related or unrelated companies (including special purpose vehicles of the ID_Corp Group), as appropriate. For example, we may share your personal information to another ID_Corp Group entity who are managing the construction of a Development you have invested in the fund for.
Financial advisors and authorised representatives	We may share your personal information with financial advisors or planners who are assisting with our Development funds, where you have expressed interest in finding out more about investing with us. We may also share your information with any of your authorised representatives or agents (for example, your financial advisor or accountant), if applicable.
Financial providers	We may share your personal information with our financiers and prospective financiers, financial institutions (for payment processing), and/or mortgage brokers (as relevant).
Our service providers, advisors and other entities we do business with	We may share your personal information with our: • service providers (including payment processors), agents, contractors, sub-contractors and other third parties that provide services to us, including our technology service providers and administration service providers; and • professional advisors, including legal and accounting firms, auditors, consultants, insurers and other professional advisers. Please note that we may disclose personal information to the service provider and the service provider may in turn provide us with personal information collected from you in the course of providing the relevant products or services.
Corporate restructure	We may share your personal information with people or entities considering acquiring an interest in Title Capital, ID_Corp Group or any business or assets of either Title Capital or the ID_Corp Group, for the purpose of facilitating or implementing a transfer or sale of all or part of our assets or business, or if we undergo any kind of corporate restructure. In this context, your personal information may be transferred to another entity.
Government and law enforcement agencies	We may share your personal information with law enforcement agencies, other governmental bodies or agencies (for example, ASIC,) or third parties: – if we are required by law to do so, or in other limited circumstances (for example if required by a court order or regulatory authority, or in order to comply with the conditions of our AFSL); or in order to conduct our business, for example, if we believe that such action is necessary to prevent fraud or cyber-crime or to protect our Website, our Development funds or our technology assets or the rights, property or personal safety of any person.
Referees	We may share your personal information with your nominated referees to validate details you have provided us with, including your resume, qualifications, experience, training or abilities.
Marketing organisations	We may share your information with marketing organisations that assist us with our marketing communications or who send you marketing communications on our behalf. Please see the “Do we use your

information for direct marketing” section below for further information on how we engage in direct marketing.

- 9.3 If you post information or other content to public sections of our website or to our social media sites, you acknowledge that the information or content may be viewed by the public and/or users of the relevant website or social media site.

10. Overseas disclosures

- 10.1 We do not currently disclose personal information to third parties located overseas.
- 10.2 If this changes at some point in the future, we will only ever share your personal information outside of Australia where we are permitted to do so under the Privacy Act. This means that we will take reasonable steps to ensure that any such overseas recipients do not hold, use or disclose your personal information in a way that is inconsistent with the obligations imposed under the Privacy Act and the Australian Privacy Principles in the Privacy Act. If this happens, this Privacy Policy will be updated accordingly.

11. Links to other websites

- 11.1 When you access our Website or other online services, we may provide, as a convenience to you, links to other websites, including sites operated by ID_Corp Group, our partners, associates, or independent third parties. Each website has its own privacy practices, as described in that website’s privacy policy. Those practices may be different than the practices described in this Privacy Policy, and we encourage you to read each website’s privacy policy carefully before you use or submit information to that site. If applicable to you, please see the ID_Corp Group’s group-wide privacy policy, available <https://www.idland.com.au>.
- 11.2 Additionally, to the extent that you follow a link to a website operated by an independent third party, please be aware that we exercise no authority or control over that third party, and cannot and are not responsible for any information that you may submit to that site. We encourage you to read the relevant third party’s privacy policy before supplying any personal information to them.

12. Cookies, Pixels and other third-party online tracking technologies

- 12.1 Title Capital may collect statistical information when you access and use our Website and any online platforms available via our Website, by utilising features and technologies of your internet browser, including cookies and tracking pixels. We use these tracking technologies for a variety of purposes, including to:
- collect data about our website traffic;
 - analyse how our Websites are being used,
 - improve our Websites; and
 - provide more user friendly and customised websites and online services.
- 12.2 These features and technologies do not specifically identify you unless you otherwise provide personal information to us that enables identification. As such, information collected through these tracking technologies may be personal information.

- 12.3 We also use third-party service providers, such as Google and Meta, that may collect data related to your use of our online services through tracking technologies, such as third-party tracking pixels and web beacons, for analytic and marketing purposes. We use these third party providers to help us improve the advertising that you see from us, some of which may be personalised, when you visit their respective platforms or networks (such as Facebook and YouTube).
- 12.4 These third-party services may also link the information collected about you to your personal profiles on their platforms if you are logged in.
- 12.5 You may not be able to entirely disable ads that you see, however, you can control how these platforms use your information by adjusting your ad preference and personalisation settings by:

Provider	Description
Meta Platforms Inc	If you use Facebook, Instagram, Threads or any other platforms or networks owned or used by Meta, you can generally adjust your 'ad preferences' in the account settings of the respective platform that you access and see ads in.
Alphabet Inc	If you use YouTube, Google or any other platforms owned by Alphabet, you can manage how tracking technologies are used by checking your browser or account settings and adjusting your 'privacy & safety' and 'search personalisation' settings.

- 12.6 These third party providers may update their policies and settings from time to time, so we encourage you to review their terms and policies for more information on their data collection practices and options available to you for managing your privacy. Please note that how these third parties handle and use your data is governed by their own privacy policies, not ours.

Cookies

- 12.7 Below are the main types of cookies we use a combination of:

Type of Cookie	How we use this Cookie
Session Cookies	Session cookies are used to track your movements from page to page. These cookies are usually erased when you close your web browser.
Persistent Cookies	Persistent cookies are stored on your device between browser sessions for a pre-defined amount of time. These cookies allow the site to remember your information or settings across the site). These cookies also enable targeted advertising.
Functional Cookies	Functional cookies remember information such as usernames or language settings and may allow the site to display important alerts. These cookies are not considered necessary, and can be blocked by the user, although this may impact how the site functions. In some instances, functional cookies are used by the website to.
First party Cookies	First party cookies are set by the website you are browsing.
Necessary Cookies	Necessary cookies are either session or persistent cookies, and are used to perform functions such as storing data and remembering you between pages. Similar to session cookies, these cookies are necessary for a number of functional features on our website.

Tracking and Social Cookies	Tracking and social cookies are either session or persistent cookies, but are not essential to the function of our website. These cookies help improve your experience by providing content relevant to you.
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- 12.8 You can choose which sites and devices allow cookies to be used, by changing your web browser preferences. For example, depending on which browser your device uses, you may be able to disable certain third-party cookies. It may be necessary for you to opt out separately from each device and browser that you use to access online content.
- 12.9 To change your web browser preferences, please visit the relevant preferences or settings page on your browser and amend the privacy settings in relation to cookies and site data. As set out above, you can also change the settings on websites you receive tailored advertising (such as on Facebook, via your account settings), to control the extent to which you receive tailored advertising facilitated by cookies.

Tracking pixels

- 12.10 A tracking pixel is a piece of code that a business or third-party provider can place on its website or in email to collect information about a users' activity, including the site pages they visit time spent on each page, IP address, and/or form inputs (as relevant). When users visit pages with pixels, the pixel "loads" and send the information it is designed to collect back to the server of e.g. in the case of third-party pixels this would be to the third-party service provider like Meta or Google (as set out above).
- 12.11 Below are the main types of tracking pixels we use a combination of:

Type of Pixel	How we use these Pixels
Retargeting Pixels	These are coded to monitor specific actions you make, such as which pages you visit, how much time you spend on each page, or how far you scrolled down a page. These help us understand our users' behaviour on our Websites.
Conversion Pixels	These are designed to track completed actions. When an action is completed it sends a signal back to the server. This data helps us understand how effective a particular webpage is at encouraging specific actions.
Analytical Pixels	These pixels collect a wide range of data, including page views, time spent on the site and visitor demographics
Email Tracking Pixels	We use these in email campaigns to track actions like email opens, link clicks and forwards. When you open an email, the pixel sends a signal back to the server, providing data that can help in understanding the effectiveness of email marketing strategies.
Affiliate Pixels	Affiliate pixels are used to track sales or leads generate through affiliate marketing. When a visitor clicks on an affiliate link and completes a specific action, the pixel fires, allowing the affiliate to earn a commission for the sale.

- 12.12 If you wish to opt-out of this tracking, please contact us at info@titlecapital.com.au.

13. Do we use or share your personal information for direct marketing?

- 13.1 Title Capital and/or our third party service providers may use and share your personal information for the direct marketing purposes set out in the table below (sent through various channels, such as via regular email, SMS, telephone or social media (through targeted advertisements on certain websites, mobile applications and social media channels)).

- 13.2 Where you provide personal information to Title Capital, we may share this personal information to entities in the ID_Corp Group so that they may undertake direct marketing as set out in 13.1.
- 13.3 We will only send you these communications in accordance with the Privacy Act (including Australian Privacy Principles 7) and the *Spam Act 2003* (Cth), and only where you have not opted out from receiving such communication from Title Capital.
- 13.4 You are always in control of the direct marketing communications which you receive from us and can opt-out at any time using the methods described in the table below. Generally, you can opt-out by following the relevant opt-out or unsubscribe instructions in the relevant communication (such as email or SMS message). You can also contact us using the details set out in section 16 of this Privacy Policy to tell us you would like to stop receiving direct marketing communications from us.
- 13.5 If you have indicated a preference for a method of communication, we will endeavour to use that method wherever practical to do so.

Format / Channel	Explanation	How to opt-out?
Direct marketing via email, SMS message and mail	We may use your personal information to send you direct marketing communications to let you know about us and products and services (including investment opportunities, new Developments, special offers and events) offered by Title Capital, and carefully selected products and services of ID_Corp Group or third parties, which we think might be of interest to you based on your interactions with us, or as otherwise allowed under applicable Privacy Laws. For example, if we are offering an investment opportunity for an ID_Corp Group Development, we may promote the services of ID_Corp Group or one of the third party builders.	You can opt-out by following the relevant unsubscribe instructions in the relevant communication (such as email or SMS message). To opt-out of direct marketing via mail/post, you can also contact us using the detail set out in section 16 to tell us you would like to stop receiving direct marketing communications from us in this way.
Cookies	We use advertising programs that place cookies on your computer to collect information about your browsing history (including on external websites). This information, which does not identify you personally, is collected in order to improve your online experience by customising the advertising you see to your interests (including the display of more relevant advertisements on external websites).	You can only opt-out of these types of cookies and tracking technologies by adjusting your device and browser settings and online privacy settings (for advertising on certain websites, mobile applications and social media channels).

Tracking pixels and other online tracking technologies	Some tracking pixels and other online tracking technologies we use may use your personal information for direct marketing (for example, to show you targeted advertisements).	You can opt-out of these types of tracking technologies by contacting us at info@titlecapital.com.au .
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Important points regarding opting out –

Importantly:

- 13.6 if you are a customer of or have signed-up, registered your interest or otherwise, with both Title Capital and other ID_Corp Group member entities (for example, you have purchased a property through ID_Land, and are also separately signed-up to receive news and updates from Title Capital), even if you opt out from receiving direct marketing communications from, for example, Title Capital, this will not mean you are opted-out from receiving direct marketing communications from ID_Land or vice-versa; and
- 13.7 regardless of whether you opt out from receiving any or all direct marketing communications, we will still communicate with you if required by law to provide you with information, or in relation to a Development or fund you have invested in or other related services we are providing to you.

14. How do we store and protect your personal information?

- 14.1 We are committed to protecting your personal information and ensuring that we securely store any personal information we collect (in accordance with applicable Privacy Laws). We may hold your personal information in hard copy (paper) or electronic form.
- 14.2 Title Capital takes steps reasonable in the circumstances to ensure that the personal information it holds is accurate, complete, up-to-date and stored in a secure environment protected from misuse, interference and loss, and from unauthorised access, modification or disclosure.

Security and storage of personal information

Form	Explanation
Paper-based files	We store personal information in paper-based files in secure storage, and maintain physical security measures to ensure that such personal information is protected, such as physical locks on drawers and cabinets, and security systems at our premises. Paper files may also be archived in boxes and stored offsite in secure facilities.
Electronic records	Your personal information will be stored on databases held on servers located in a technologically secured environment, accessed only by authorised personnel or contractors (with login and password protection). We also maintain physical security measures in relation to storage of our electronic records (such as locks and security systems), and maintain computer and network security, by using firewalls. Anti-virus software and other security systems to control access to our computer systems. Title Capital also has policies and procedures in place in relation to document storage and security.

Our Website (including when making payments)	Our Website use encryption and other technologies to ensure that your personal information is securely transmitted via the internet. We process payments using EFTPOS and online technologies. All transactions processed by us meet industry security standards to ensure payment details are protected.
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How long do we keep your personal information?

- 14.3 We will only keep personal information we store for as long as is necessary for the purposes set out in this Privacy Policy, or as required to comply with any applicable legal obligations. This will involve us regularly reviewing our files to check that information is accurate, up-to-date and still required.
- 14.4 If you withdraw your investment in a Title Capital fund or you decide not to go ahead with your investment in one of our funds, we may still keep your information to the extent allowed under applicable Privacy Laws.
- 14.5 When we no longer require (and in accordance with any applicable Privacy Laws), we will take steps to delete, destroy or de-identify that information.

15. How can you access or seek correction of your personal information?

- 15.1 You are entitled to request access to any of your personal information held by Title Capital. To make such an access request, please contact us using the contact details below at section 16.
- 15.2 Title Capital takes reasonable steps to ensure the personal information it holds is accurate, up-to-date, complete, relevant and not misleading. You can help us to do this by letting us know if you notice errors or discrepancies in information we hold about you, and informing us of any change in your personal details.
- 15.3 In addition, under the Privacy Act, you have a right to seek access to and correction of your personal information that is collected and held by Title Capital. If at any time you consider any personal information we have about you is inaccurate, out-of-date, incomplete, irrelevant or misleading, you are entitled to request correction of that information using the contact details in section 16. Title Capital will grant access to the extent required or authorised by the Privacy Act and will take reasonable steps to correct your personal information.
- 15.4 If we correct personal information about you, and we have previously disclosed that information to another agency or organisation that is subject to the Privacy Act, you may ask us to notify that other entity. If so, we will take reasonable steps to do so, unless this would be impracticable or unlawful.
- 15.5 Title Capital will respond to your request within 30 days. We may decline your request to access or correct your personal information in certain circumstances in accordance with applicable privacy laws, however if we do so, we will provide you with written reasons for the refusal and details of complaint mechanisms.
- 15.6 If you are dissatisfied with Title Capital's refusal to grant access to, or correct, your personal information, you may complain to us using the contact details at section 16 below.

16. How can you contact Title Capital?

- 16.1 For further information or enquiries regarding your personal information, or if you would like to opt-out of receiving any promotional or marketing communications or make a privacy complaint, please contact us using any of the following details:

Contact Title Capital

Email	info@titlecapital.com.au
Phone	03 9867 4700
Postal address	Privacy Officer, Level 12, 484 St Kilda Road, Melbourne VIC 3004

17. Privacy complaints and questions

- 17.1 If you have any questions or concerns about this Privacy Policy or how we have handled your personal information, you may contact us at any time using the relevant contact details set out above in section 16.
- 17.2 Please also contact us if you have a complaint about privacy. If you make a complaint about privacy, the following will occur:

No.	Step
1.	We will first consider your complaint to determine whether there are simple or immediate steps which can be taken to resolve the complaint. We will generally acknowledge your complaint within a week.
2.	If your complaint requires more detailed consideration or investigation: - we will acknowledge receipt of your complaint within a week and endeavour to complete our investigation into your complaint promptly; and - we may ask you to provide further information about your complaint and the outcome you are seeking. If your initial complaint was not written, we may ask you to submit your complaint in writing.
3.	We will then typically gather relevant facts, locate and review relevant documents and speak with the individuals involved.
4.	In most cases, we will respond to your complaint within 30 days from when we receive your complaint. If the matter is more complex or our investigation may take longer, we will let you know, and tell you when we expect to provide our response.

- 17.3 If you are not satisfied with our response to a complaint, or you consider that we may have breached the Privacy Act (including the Australian Privacy Principles), you are entitled to make a complaint to the Office of the Australian Information Commissioner (the Australian privacy regulator).
- 17.4 The Office of the Australian Information Commissioner can be contacted by telephone on 1300 363 992, or you can fill out this form to make a complaint about our handling of your personal information. Full contact details for the Office of the Australian Information Commissioner can be found online at www.oaic.gov.au.