ARENA REIT
PRIVACY POLICY

February 2026

1. About this policy

Arena recognises that your privacy is important to you. This policy has been prepared by Arena REIT Limited (ACN 602 365 186) and its related bodies corporate (collectively, Arena) to provide you with information on the collection, storage, use and disclosure of your personal information by Arena. A reference to personal information means information that identifies an individual or from which an individual's identity can reasonably be ascertained.

Arena abides by the *Privacy Act 1988 (Cth)* (Privacy Act) and the Australian Privacy Principles (APPs). A summary of the APPs is available by contacting our office using the details provided at the end of this document.

2. Kinds of personal information collected and held

In the course of providing investment management services Arena may collect:

a) personal information such as your name, date of birth, telephone numbers, email address, bank account details and investment information;

b) sensitive information such as your tax file number or membership of a professional association; and

c) other information that may be required under Australian anti-money laundering legislation for identification and other purposes, including sensitive information such as your country of origin.

In some circumstances, Arena may also hold other personal information you provide.

3. How Arena collects personal information

Generally, Arena collects your personal information directly from you. For example, Arena may request that you provide your personal information when you become an investor in a fund or submit information via the Arena website. The website uses a feature of your web browser known as "cookies" to store information and identify you to the system while on your session. No personal details are contained in the cookies.

Arena also receives personal information by direct communication including email, letters, over the telephone and through financial transactions. There may be other occasions when Arena collects your personal information from you or from other sources, such as from your authorised financial adviser, Arena's related bodies corporate, a publicly maintained record or from an information services provider. Arena will only do so where it is not reasonable and practical to collect the information directly from you.

4. How Arena holds personal information

Arena holds personal information in a number of different formats including in electronic databases, hard copy and electronic versions of forms that you submit. Personal information that Arena stores is made available to staff who need access to it, on personal devices such as computers and smartphones.

Arena will take all reasonable steps to ensure that the personal information it holds is protected from misuse, interference and loss, unauthorised access, modification or disclosure, including:

a) restricting access to personal information to those staff, related entities and service providers who need access to the personal information to perform their role;

b) implementing security systems designed to protect personal information stored on our computer network (such as access control procedures, multi-factor authentication, network firewalls and data encryption);

c) implementing physical security measures within its offices and at its premises;

d) communicating this policy to all staff and requiring staff to complete annual privacy and cyber security training; and

e) where appropriate, requiring that service providers and other third parties to whom Arena discloses personal information comply with the Privacy Act.

Arena will take reasonable steps to destroy personal information or ensure it is de-identified when the information is no longer needed for any purpose for which it may be used or disclosed under the APPs.

5. How Arena uses and discloses personal information

Arena usually collects, holds, uses and discloses your personal information for the following reasons:

a) providing you with access to Arena's website including restricted pages containing your personal investment information;

b) facilitating Arena's internal business operations;

c) administering and processing requests that you submit;

d) communicating with you in relation to your investments;

e) advising the Australian Taxation Office and other governmental authorities of your tax file number;

f) to enter your details on the register of the members of a fund;

g) to make deposits of distributions to your nominated bank account;

h) for accounting, billing and other internal administrative purposes;

i) to comply with requirements under any applicable laws, including the anti-money laundering legislation, tax reporting requirements (FATCA and Common Reporting Standard) and obligations to make registers of members of funds (including your name, address and holding in the fund) available for inspection or provide a copy in certain circumstances;

j) where disclosure is reasonably necessary for a law enforcement related activity;

k) for the purposes for which it was provided for or for a related secondary purpose (or, in the case of sensitive information, a directly related secondary purpose) where you would reasonably expect Arena to use or disclose the information;

l) where another permitted general situation applies or another permitted health situation exists; or

m) where you have given your consent.

Arena will not use or disclose personal information collected by us for any purpose other than those listed above.

6. Who Arena discloses personal information to

The types of organisations to which Arena may disclose the personal information you provide include:

a) your financial advisers or other professional advisers;

b) third party service providers which Arena may engage to provide registry, compliance, custody, administration, technology, auditing, mailing, printing, due diligence or other services;

c) Government authorities such as the Australian Securities and Investments Commission (ASIC) where required to by law or where reasonably requested;

d) Arena's professional advisers (including legal and accounting firms, auditors, consultants and other advisers);

e) any person who makes a valid request to inspect or obtain a copy of a register of members of a fund that is registered with ASIC, of which you are a member; and

f) Arena's related bodies corporate or any other company within the Arena group.

Arena has appointed Boardroom Pty Ltd (Boardroom) to provide registry, investor communications and related services. Boardroom is one of Australia's leading providers of registry and related services for listed and unlisted investment funds. When you provide personal information to Arena in relation to a current or proposed investment, that information will be disclosed to Boardroom to enable Arena to provide its financial services to you. Under the terms of appointment, Boardroom is required to comply with this policy and the Privacy Act.

7. Overseas disclosures

Unless we are required to by law, Arena will not disclose personal information to overseas recipients.

8. Third party links

Arena's website may contain links to websites operated by third parties. Unless otherwise stated, Arena is not responsible for the privacy practices of, or any content on, those

linked websites. If you access other websites using the links provided, we encourage you to review the privacy policies and other terms which apply to those websites, as they may differ form Arena's policy.

9. Accessing and seeking correction of your personal information

You may request access to your personal information at any time and Arena will notify you whether it agrees to provide you with access. If access is agreed, Arena will require you to provide evidence of your identity prior to providing access in accordance with this policy. Arena will provide access to personal information by either providing you with copies of the information requested or allowing you to inspect the information.

The APPs place other restrictions on accessing your personal information. Restrictions include:

a) where the provision of access would have an unreasonable impact on the privacy, or would pose a serious and imminent threat to the health or safety of any individual;

b) the request for access is frivolous or vexatious; or

c) the provision of access is unlawful or would be likely to prejudice a criminal investigation.

If Arena declines your request for access, an explanation for that refusal will be provided.

Arena seeks to ensure that personal information held is accurate, complete and up to date by confirming your identity by reference to existing records when you make contact. You may access various forms with which you can update your personal information at any time via the website. Generally Arena will require changes to personal information to be advised in writing.

10. How you can make a privacy complaint

If at any time you have any complaints in relation to privacy, please contact Arena's Privacy Officer using the contact points referred to below. Arena will acknowledge your complaint promptly, investigate objectively and provide a written response (within 30 days), however if you are unhappy with the response, you are entitled to contact the Office of the Australian Information Commissioner who may investigate your complaint further.

Arena will seek to handle privacy complaints in a manner consistent with its internal dispute resolution procedure for financial services; however the external resolution process for financial services (through the Australian Financial Complaints Authority) is separate from privacy complaints which are dealt with by the Office of the Australian Information Commissioner.

Where a loss or unauthorised access, modification or disclosure of personal information held by us occurs, or is suspected, Arena will promptly assess the matter and take action in accordance with the requirements of the Privacy Act

Additional information about privacy in Australia may be obtained by visiting the web site of the Office of the Australian Information Commissioner at www.oaic.gov.au.

11. Changes to our privacy and information handling practices

This policy is subject to change at any time and changes will be published on our website. Arena will review this policy annually to assess that it is operating effectively and to consider whether any changes are required to the policy.

Please check our website regularly for any changes.

12. Questions

Any questions may be directed to the Privacy Officer using the contact points referred to below.

You may deal with Arena by not identifying yourself or by using a pseudonym, however Arena may not be able to provide you with the information that you seek without verifying your identity.

Contact

Arena REIT Limited ACN 602 365 186
Arena REIT Management Limited ACN 600 069 761
Level 15, 8 Exhibition Street
Melbourne Victoria 3000

Any questions may be directed to:
The Privacy Officer
E: privacy@arena.com.au
T: +61 3 9093 9000

Postal address:
Locked Bag 32002
Collins Street East
Melbourne Victoria 8003

www.arena.com.au