



Privacy Policy

Contents

- 1 Purpose 3**
- 2 Coverage / Scope..... 3**
- 3 Values & Commitments..... 3**
- 4 Policy..... 3**
- 5 Links / interaction with other policies 6**
- 6 Attachments..... 6**
- 7 Procedures..... 6**

1 Purpose

This policy outlines the approach of Australian Pipeline Limited, as responsible entity of Australian Pipeline Trust and APT Investment Trust that together comprise APA Group (**APA**), to complying with the Privacy Act (Cth) 1988 (**Privacy Act**) requirements relating to the collection, storage, use and disclosure of personal information.

Personal information is defined in the Privacy Act as follows:

Personal information means 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 Coverage / Scope

This policy applies to all directors, employees and contractors of the responsible entity, APA and companies that form part of APA.

3 Values & Commitments

APA is committed to handling and protecting personal information in accordance with National Privacy Principles set out in the Privacy Act.

4 Policy

4.1. What personal information is held

APA may hold personal information (including names, addresses, contact details, bank account details) about holders of securities in APA or other financial products issued from time to time by Australian Pipeline Trust and/or APT Investment Trust (**Securityholders**).

APA may also hold personal information about individuals as necessary for the conduct of APA's business, including but not limited to, personal information related to its customers, clients, advisers and third party service providers.

4.2. How personal information is collected

Personal information regarding Securityholders is collected by Link Market Services Limited (Link), the external registry service provider to APA.

Personal information may be received by APA from Link as a part of the registry services.

APA may also receive personal information from third parties as a consequence of the ordinary conduct of APA's business.

APA has a website: <http://www.apa.com.au/>. The website does not contain any files which collect personal information from persons who view that website.

APA may, from time to time, include links in its website to the websites of other organisations. APA is not responsible for the privacy practices of those websites.

4.3. Purpose for holding personal information

APA may hold personal information for the purpose of, or incidental to, the conduct of its business. Such purposes include:

- efficient management of underlying assets;
- provision of information to Securityholders;
- management of third party relationships including outsourced service providers and consultants;
- management of APA's internal operations;
- compliance with APA's legal obligations; and
- management of investor relations; for example, the payment of distributions, sending annual and half-yearly reports, notices of meetings or newsletters, notifications to the Australian Taxation Office and register analysis.

4.4. How personal information is held

Personal information held by Link to carry out registry functions for APA is held in accordance with Link's privacy policy. To obtain a copy of Link's privacy policy refer to their website: <http://www.linkmarketservices.com.au/>.

All personal information received by APA is held securely, either in electronic files on APA's computer systems or in physical files stored at APA's premises.

APA takes reasonable steps to protect all personal information it holds by using necessary technology (i.e. firewalls) and systems to ensure that the information is secure from misuse, loss and unauthorised access, modification or disclosure.

4.5. Use and disclosure of personal information

APA may disclose personal information of Securityholders to the extent APA is required to do so under the Corporations Act 2001 (Cth).

APA may disclose personal information, to the extent reasonably required, for the ordinary conduct of APA's business, to the following:

- consultants and advisers (including, but not limited to, solicitors);
- agents or contractors acting on APA's behalf;
- third party service providers and parties to whom APA has outsourced various functions (e.g. printing and mailing services);
- related parties and entities of APA; and
- regulatory authorities and government agencies where required by law.

No employee, contractor, consultant or agent of APA is authorised to access any personal information which is not required for the proper performance of their job.

If APA discloses personal information to contractors and/or service providers to assist in the operation of APA's business, it is done on the condition that those organisations comply with the National Privacy Principles

APA does not sell personal information to companies outside APA.

4.6. Quality of personal information

APA will take reasonable steps to ensure that any personal information collected, used or disclosed is accurate, complete and up-to-date.

APA will take reasonable steps to destroy or permanently de-identify personal information if it is no longer needed for the ordinary conduct of APA's business and it is no longer a legal requirement for the information to be kept.

4.7. Access to personal information

Individuals have the right to access, update and correct their personal information.

Securityholders who would like details of their personal information held by Link on behalf of APA, or would like to correct such information, should contact Link.

Individuals who wish to view the personal information that APA holds about them may submit a written request to APA's Privacy Officer, whose details appear below.

APA aims to respond to any written requests within 14 days of the date of receipt of such request.

4.8. Questions or complaints

Any questions about this policy or complaints should be directed APA's Privacy Officer on (02) 9693 0000, or by writing to the following address:

Privacy Officer
APA Group
Level 19, 580 George Street
Sydney NSW 2000

A complaint should be made if it is considered that APA has breached this policy or the National Privacy Principles or otherwise does not respect privacy.

4.9. Changes to Privacy Policy

APA reserves the right to change this policy at any time and will provide an updated version of the policy on its website: <http://www.apa.com.au/>.

5 Links / interaction with other policies

Privacy Policy – Employees
Code of Conduct

6 Attachments

Nil

7 Procedures

Nil