

## Privacy Policy

Develop Capital – Privacy Policy

Last updated: 18 December 2025

Develop Capital (“we”, “us”, “our”) is committed to protecting your privacy and handling your personal information in accordance with the Australian Privacy Principles (APPs) under the Privacy Act 1988 (Cth).

This Privacy Policy explains how we collect, use, store and protect personal information across our websites, online platforms, and business operations.

### 1. What Personal Information We Collect

We collect personal information that helps us communicate with you, provide updates, and deliver our services. This may include:

- Name
- Email address
- Phone number
- Location/suburb
- Job title or profession
- Information provided during calls or meetings
- Information captured via website forms, Calendly bookings, or event registrations
- Engagement data from email marketing (HubSpot)
- Investor documentation stored in InvestNext (for qualified investors only)

We do not collect sensitive information such as ethnicity, political affiliation, religious beliefs, or health information.

## 2. How We Collect Personal Information

We collect personal information when you:

- Submit a form on our website
- Book a call or meeting
- Register for an event
- Join our email list
- Communicate with us directly
- Are referred to us by an existing contact
- Provide onboarding documentation via InvestNext

We may also collect information automatically through cookies, analytics tools and email engagement trackers.

## 3. Why We Collect Personal Information / How We Use It

We use your personal information to:

- Communicate with you
- Provide educational property-related content
- Send event invitations and updates
- Manage marketing communications via HubSpot
- Maintain contact records and engagement history
- Manage investor qualification discussions
- Provide access to InvestNext for known, pre-qualified contacts only
- Meet compliance obligations and maintain secure records

We do not publicly advertise or solicit investment. Any project-specific information is provided privately to known contacts only, in accordance with the Corporations Act 2001 (Cth) small-scale offering provisions.

#### 4. Cookies, Analytics & Website Tracking

Our websites use standard cookies, tracking pixels and analytics tools to improve user experience and understand how visitors engage with our website.

#### 5. Storage & Security of Personal Information

We take reasonable steps to protect your information from misuse, interference, loss, unauthorised access, modification or disclosure.

#### 6. Disclosure of Personal Information

We do not sell, trade or share your personal information externally. We may disclose information to service providers (HubSpot, InvestNext), professional advisers or regulatory bodies where required.

#### 7. Access, Correction & Deletion of Personal Information

You may request access to, correction of, or deletion of your personal information at any time.

#### 8. Unsubscribing / Opting Out

Every marketing email includes an unsubscribe option.

#### 9. Complaints

Complaints may be lodged directly with us, and if unresolved, with the Office of the Australian Information Commissioner (OAIC).

#### 10. Contact Us

Email: [info@developcapital.com.au](mailto:info@developcapital.com.au)