

PRIVACY

SAMUEL PROPERTY GROUP PTY LTD and any of its Related Bodies, as that term is defined in the Corporations Act 2001 (Cth) ("SAMUEL PROPERTY", "we", "us", "our"), are bound by the Australian Privacy Principles in the Privacy Act 1988 (Cth) (Privacy Act).

We understand the importance of, and are committed to, protecting your personal information. This Privacy Policy explains how we manage your personal information, including our obligations and your rights in respect of our dealings with your personal information.

1. PERSONAL INFORMATION

"Personal information" is information or opinion about an identified individual, or an individual who is reasonably identifiable.

We collect and hold personal information that is reasonably necessary for, or directly related to, one or more of our functions or activities as the supplier of goods and services. The personal information we collect will depend on the type of dealings you have with us, and that information may include (as well as other information):

- your name and date of birth;
- your contact details including residential address, email address and telephone number;
- if you are a prospective purchaser, we will collect information about the details of the property you are interested in or have agreed to purchase, how you heard about us, whether you are an investor or an owner-occupier and price points and the apartment types you are interested in;
- if you have purchased a property from us, we will collect a copy of your passport or driver's licence to verify your identity as well as information about whether or not you are an Australian resident, the terms of your contract with us, your payment details, the details of your financing arrangements, including your lender and the amount being borrowed and contact details of your authorised representatives;
- if you are a supplier, contractor or consultant to us, we will collect information about your name, contact details, the details about the goods and services you supply and payment details;
- if you make an enquiry with us or provide us with feedback, we will collect information about your name, contact details, details of your enquiry or feedback and information about our response;
- if you participate in market research conducted by us or on our behalf, we will collect information about your name, contact details and details of your responses to our market research questions;
- if you request information from us about our products or services or complete a contact form at one of our display suites, we will collect information about your name, contact details, details of your request, how you heard about our products or services, whether you are an investor or owner-occupier and details of any properties you are interested in; and
- if you apply for a job with us, we will collect the information included in your application, such as your cover letter, resume, contact details and referee reports.

"Sensitive information" is information or opinion about an individual which is:

- personal information which is also information or an opinion about the individual's racial or ethnic origins, political opinions, political association membership, religious beliefs or affiliations, philosophical beliefs, professional or trade association membership, trade union membership, sexual orientation or practices, or criminal record; or
- health, genetic or biometric information about the individual.

We will only collect sensitive information (including health information) about you with your consent, except where we are required or permitted by law to collect your sensitive information without your consent.

2. COLLECTION AND USE

Purpose

Our main purposes for collecting, using, holding and disclosing personal information is to:

- provide you with the goods and services you have requested or inquired about;
- outline our products and services to prospective and existing purchasers;
- complete sales transactions and assist purchasers with the management of their property after settlement;
- obtain finance for our projects;
- promote our products and services, including by way of direct marketing and events;
- contact you for business purposes;
- conduct research and statistical analysis, including for customer satisfaction and service improvement purposes;
- recruit staff and contractors; and
- respond to queries and resolve complaints.

We may also collect, use, hold and disclose personal information for any other purpose explained at the time of collection, or:

- to comply with our legal obligations (including to comply with any law or any lawful request from a government authority or law enforcement agency);
- to resolve any disputes we may have with any of our clients; or any other purpose for which you have provided consent.

We do not sell, rent or lease your personal information to third parties.

You have the right to refuse to provide us with personal information, and where it is lawful and practical to do so, we will provide individuals with the option to not identify themselves or to use a pseudonym. However, if you decide not to provide us with personal information, we may be unable to provide you with the products, goods and services you have requested or inquired about.

Method of collection

We only collect personal information by lawful and fair means. We generally collect personal information directly from you. This information may be collected in various ways, including:

- in person;
- from our website (including through our 'Enquiries' form or through cookies);
- through our social media pages;
- over the telephone;
- through written correspondence;
- on hard copy forms (including enquiry forms or surveys);
- from third parties, such as your professional representatives, real estate agents, Land Use Victoria, the Australian Securities and Investment Commission, local Councils and credit reporting agencies.

Unsolicited information

If we receive personal information about you that we have not requested, and if we determine that we could not have lawfully collected that information under privacy law if we had requested it, we will destroy or de-identify the information, if it is lawful and reasonable to do so.

Notices

If we have collected personal information about you, we will take reasonable steps to notify you of the collection and of matters relevant to the collection, unless it is obvious from the circumstances that you would expect us to have that information. This notification is generally done by way of a collection notice.

Direct marketing

Where you have given us your express or implied consent, or where we are permitted by law to do so, we may use or disclose your personal information to market our products and services to you.

If you have consented to receiving marketing communications from us, your consent will remain current until you advise us otherwise. Where possible, we will, provide you with a choice to opt-out of any of our direct marketing communications. We will respect any request to decline to receive our marketing communications.

3. DISCLOSURE

In general, we do not use or disclose your personal information for a purpose other than:

- a purpose set out in this Privacy Policy;
- a purpose you would reasonably expect;
- a purpose required or permitted by law; or
- a purpose otherwise disclosed to you to which you have consented.

We may also disclose your personal information to other organisations, for example, to:

- our related companies (if any);
- government or regulatory authorities, where required or permitted by law;
- financiers and prospective financiers;
- your authorised agents or representatives;
- real estate agents;
- local Councils;
- mortgage brokers or financial planners;
- owners corporation managers or managing or leasing agents;
- other contracted service providers, including subcontractors and suppliers, delivery and shipping providers, information technology and data storage providers, marketing and communications agents, venues and event organisers, research and statistical analysis providers and external business advisers.

We take all reasonable steps to ensure that these organisations are bound by confidentiality and privacy obligations with respect to the protection of your personal information. We may disclose your personal information to these parties to enable them to assist us in providing our products and services to you.

Overseas recipients

We are unlikely to disclose your personal information to any overseas recipients. If this changes, we will comply with the requirements of the Privacy Act in relation to cross border disclosures of personal information and this Privacy Policy will be amended to reflect those requirements.

Government related identifiers

We will not use any government related identifier (including a passport number or driver's licence number) as our identifier of individuals or otherwise use or disclose any government related identifier unless this is permitted under the Privacy Act (for example, to verify the identity of an individual as required by Australian law).

4. ACCESS

You may request access to the personal information that we hold about you by contacting us.

We will deal with your request for such access within a reasonable time. If we refuse your request, we will provide you with a written notice which sets out the reasons for the refusal and the relevant provisions of the Privacy Act that we rely on to refuse access.

We may recover reasonable costs in relation to a request for access to personal information.

5. ACCURACY

We take reasonable steps to make sure that the personal information we collect is accurate, up-to-date and complete. We take reasonable steps to make sure that the personal information we use or disclose is accurate, up-to-date, complete and relevant. Where we believe that the personal information we hold is inaccurate, out-of-date, incomplete, irrelevant or misleading, we will take reasonable steps to correct that information.

You may also request that we correct your personal information that we hold by contacting us by using the contact details provided above. We will take reasonable steps to correct the information to ensure that it is accurate, up-to-date, complete, relevant and not misleading.

We will deal with your request to correct your personal information within a reasonable time. If we do not agree with the corrections you have requested, we are not obliged to alter your personal information accordingly. However, where we refuse to correct any personal information as requested by you, we will give you a written notice which sets out the reasons for our refusal.

6. SECURITY

We hold your personal information in paper-based and/or electronic files. We take all reasonable steps to ensure that your personal information which is kept in our files is protected from:

- misuse, interference and loss; and
- unauthorised access, modification or disclosure.

This means that, in respect of our paper-based files, we maintain various security systems on our premises, and in respect of electronic files, we maintain secure electronic network systems. When we no longer require your personal information (including when we are no longer required by law to keep records relating to you), we ensure that it is destroyed or de-identified.

7. WEBSITE

This section explains how we handle personal information collected from our website. If you have any questions or concerns about transmitting your personal information via the internet, you may contact us, as there are other ways for you to provide us with your personal information.

Visiting our website

Anytime you access an unsecured part of our website, that is, a public page that does not require you to log on, we will collect information about your visit, such as:

- the time and date of the visit;
- any information or documentation that you download;
- your browser type; and
- your server address.

Cookies

“cookie” is a small text file which is placed on your internet browser and which we access each time you visit our website. When you visit the secured pages of our website (ie pages that you have to provide login details to access) we use cookies for security and personalisation purposes. When you visit the unsecured pages of our website (ie public pages that you can access without providing login details) we use cookies to obtain information about how our website is being used.

You may change the settings on your browser to reject cookies, however doing so will prevent you from access the secured pages of our website.

Email

When we receive emails, we will retain the content of the email and our response to you where we consider it necessary to do so.

Your email address will only be used or disclosed for the purpose for which it was provided. It will not be added to any mailing lists or used for any other purpose without your consent.

Security

We make reasonable efforts to ensure that the most up-to-date security measures are used on our website to protect your personal information. Any data containing personal information which we transmit via the internet is encrypted. However, we cannot guarantee that any information transmitted via the internet by us, or yourself, is entirely secure. You use our website at your own risk.

Links on our website

Our website may contain links to third party websites. We advise that the terms of this Privacy Policy do not apply to external websites. If you wish to find out how any third parties handle your personal information, you will need to obtain a copy of their privacy policy.

8. MARKETING

We may use your personal information, including your contact details, to provide you with information about products and services which we consider may be of interest to you. We may do this even if you are on the Do Not Call Register.

We may also provide your details to other organisations for specific marketing purposes.

You may opt out at any time if you no longer wish to receive marketing information. In order to do so, you will need to request that we no longer send marketing materials to you or disclose your information to other organisations for marketing purposes. You can make this request by using the contact details provided above, or by “unsubscribing” from email marketing messages.

9. EMPLOYEE RECORDS

We are generally exempt from the Privacy Act when we collect and handle employee records and this Privacy Policy does not apply to that information. However, where State or Territory health privacy legislation applies, we are still required to protect the privacy of employee health information. This Privacy Policy will apply in those circumstances.

10. CHANGE IN CONTROL

If we sell or otherwise transfer with all or part of SAMUEL PROPERTY GROUP PTY LTD or our business to another organisation (such as in the course of a sale, merger, acquisition, liquidation or receivership), you agree that your personal information that we have collected may be disclosed to a third party, prospective purchaser, insolvency practitioner or transferee and that this is reasonable for the purposes of that party to continue or manage the business.

11. QUESTIONS AND COMPLAINTS

If you have any questions, concerns or complaints about this Privacy Policy, or our use of your personal information, please contact us. You can also contact us if you believe that the privacy of your personal information has been compromised or is not adequately protected.

Once a complaint has been lodged, we will respond to you as soon as possible.

You may also lodge a complaint with the Office of the Australian Information Commissioner by telephone: 1300 363 992 or email: enquiries@oaic.gov.au.

12.CHANGES TO THE PRIVACY POLICY

We may make changes to this Privacy Policy from time to time, without notice to you. An up-to- date copy of our Privacy Policy is available on our website.