



J I N D E E

Privacy Policy

Definitions

"Group" refers to all entities that are managed and administered together primarily by Estates Development Company 1948 Pty Ltd and includes companies, trusts and partnerships.

"Personal Information" is defined in the Privacy Act 1988 (Cth) as 'information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether true or not and whether recorded in a material form or not'. The types of Personal Information that the Group collects and holds will depend on the circumstances and relationship between the individual and the Group. Personal Information that is commonly collected by the Group includes:

- Name;
- Address (residential, postal and email);
- Phone number;
- Date of birth;
- Gender;
- Passport number;
- Tax file number;
- Emergency contact details;
- Databases of comparable sales of properties and/or businesses to appraise the value of other properties and businesses and to assist in the marketing of those properties and businesses;
- Information used with respect to the marketing, sale and/or leasing of real estate properties and/or businesses;
- Information from sellers, buyers, lessors and/or tenants and potential sellers, buyers, lessors and/or tenants of properties and/or businesses;
- Details of properties, owners and tenants used for the purpose of managing the leasing of both commercial and residential properties and references associated with tenancy applications;
- Data obtained from third parties regarding lease applicants' rental histories; and
- Data obtained from third parties for use when marketing, selling and leasing real estate properties and businesses.

Data collected by the Group can in appropriate circumstances include:

- Banking and credit card details;
- Photographs and video recordings (including CCTV footage);
- Criminal history;
- Academic record;
- IT access logs;
- Records of donations and transactions;
- Occupation details and other personal information provided by individuals to the Group or our service providers in acquiring, using or subscribing to our services;
- Financial information such as assets and liabilities, income and expenses, credit reference information and credit card/banking details; and
- Property valuations and details of properties obtained to make, analyse and/or assess those valuations.

"Privacy Statement" means a notification to an individual that address the following (as are reasonably in the circumstances):

- The full name of the Group and the contact details of the area of the Group responsible for the collection of the individual's Personal Information;
- The purposes for which the individual's Personal Information is collected;
- Any law that requires the individual's Personal Information to be collected;
- Any third parties to which the Group may disclose the individual's Personal Information and whether any such party is located overseas;
- Any consequences for the individual if all or part of the Personal Information is not provided; and
- That the Group's Privacy Policy is available on the Group's website.

Collecting Personal Information

The Group collects personal information in a number of ways depending on the type of dealings that a person may have with the Group:

- Purchasers,
- Business relations; and
- Marketing.

The information is collected in a number of forms including over the phone, contractually, via settlement agents, through applications and in all digital formats, including but not limited to cookies referred to in clause 5.

The Group will not collect Sensitive Information (as defined in the Privacy Act 1988 (Cth)) unless:

- with the individual's consent;
- if required or authorised by Australian law or court/tribunal order; or
- an exemption exists under the Privacy Act 1988 (Cth).

The Group will take reasonable steps to provide a Privacy Statement to an individual at or before the time (or, if that is not practicable, as soon as practicable after) the Group collects Personal Information about the individual.

Purpose for the Collection of Personal Information

The Group collects personal information for a number of purposes:

- In the process of buying, selling or marketing a property from/to a buyer;
- In the process of leasing or marketing a lease to a lessor;
- In the process of entering into contractual obligations with a contractor;
- In undertaking market research; and
- In the process of employment related activities including applications for employment.

The Group will not collect Personal Information unless the information is reasonably necessary, or directly related to, one or more of the Group's functions or activities.

If the Group receives unsolicited Personal Information, and the Group has no lawful basis on which to retain the information, the Group will destroy that information or ensure that it is de-identified.

If requested to do so, the Group will provide individuals with the option of not identifying themselves, or of using a pseudonym, when dealing with the Group, except where:

The Group is required or authorised by Australian law or a court/tribunal order, to deal with individuals who have identified themselves; or

It is impracticable for the Group to deal with individuals who have not identified themselves or who have used a pseudonym.

Disclosure

The Group will not sell, rent or trade supply to third parties any personal information obtained unless consent is given.

The Group may disclose personal information in some circumstances relating to the operation of the Groups' businesses including:

- For settlement and for the administration of covenants;
- For leasing purposes;
- For legal purposes;
- To organisations that provide services to the Group such as lawyers, accountants, real estate agents, marketing and advertising agents and research agencies;
- Government and statutory authorities; or
- As required by Law.

It is not standard practice for the Group to disclose personal information to overseas recipients. However, there is a possibility that on occasion your personal information may be disclosed to an overseas recipient. The location of any potential recipients will vary depending on the project or purpose concerned. Should you have any queries about the potential disclosure of your personal information to an overseas recipient, please contact the Company Secretary (contact details in clause 13).

Cookies

- A cookie is a packet of information placed on a user's computer by a website for record keeping purposes. Cookies are generally used on the Groups' sites to:
- Access online services; If a person visits the Groups' websites and log onto particular areas on the Website, cookies may be used to enable and authorise access;
- Manage advertising – to deliver online advertising and to collect information about what pages are visited and some system information. This information is used to enhance the Groups' online content; or
- Traffic monitoring – information is gathered about how people are using the groups' websites, pages visited and some system information. This information is used to enhance the Groups' online content.
- Cookies may also be used for other purposes but the information collected is not used to personally identify users.
- Information collected through Cookies is not sold, traded or rented to third parties for their use. Information collected is used by the Group and is only made available to third party consultants or advisers, for the purposes of the Group.
- If you do not want information about you to be collected through the use of cookies, there is a simple procedure in most browsers that allows you to deny or accept the cookie feature. You should note that cookies may be necessary to provide you with features or functions on the Group websites and on other websites.

Security

The Group has security procedures in place and technology to protect against loss, misuse and/or alteration of the information under its control. Databases on the groups' servers (externally located) are security protected.

Responsibilities

All employees have access to Personal Information. Employees are responsible for maintaining the appropriate level of privacy in relation to Personal Information available to them.

To do this employees must:

- Understand their responsibility in relation to maintaining the privacy of Personal Information; and
- In the event that there is uncertainty in relation to the implementation of this Privacy Policy, the matter should be raised with senior management.

An employee who misuses Private Information for their own purposes and gain will be subject to disciplinary action. The sale of any Personal Information maintained on a Data Base may result in dismissal.

Access to Personal Information

Organisations and individuals may contact the Group to request access to their Private Information. Subject to the relevant exemptions contained in the APPs and subject to an individual providing sufficient proof of his or her identity the Group will provide access to information that it holds relating to an individual. The Group reserves the right to charge a fee for the provision of this information based on the administrative cost of supplying the information requested. Further details as to these costs and the ability to access information held by us can be obtained by contacting our Company Secretary (contact details in clause 13).

Management of Personal Information

The Group will take such steps as are reasonable in the circumstances to:

- Ensure that Personal Information it collects is accurate, up-to-date and complete;
- Ensure that Personal Information the Group uses or discloses is, having regard to the purpose of the use or disclosure, accurate, up-to-date, complete and relevant;
- Protect Personal Information in its possession from misuse, interference, loss, and unauthorised access, modification or disclosure; and
- Destroy or de-identify Personal Information if the Personal Information is no longer needed or required to be retained under any law, regulation, or code applicable to the Group.

If an organisation or an individual wishes to change personal information this is inaccurate or out of date, they may contact the Company Secretary (contact details in clause 13), providing details of the Private Information they want amended.

Retention of Private Information

Personal Information that is no longer used by the Group may be retained if required to meet the Group's legal obligation to keep records under tax, corporation or other legislation.

The Group will take reasonable steps to destroy Personal Information if:

- the Group hold Personal Information about an individual;
- the Group no longer requires that Personal Information for any purpose for which that Personal Information may be used or disclosed; and
- the Group is not required by law to retain the information.

Complaints

If an individual believes that their Personal Information has not been handled by the Group in accordance with this Policy, the individual may make a complaint in writing or by email to Company Secretary (contact details in clause 13).

Complaints will be processed in a reasonable time (usually 30 days from the date on which the complaint was received). Individuals will be advised in writing of the Group's decision and any action taken.

The Group will comply with any applicable mandatory data breach notification requirements.

The Group reserves the right to amend the Privacy Policy from time to time.

Contact details

Attention: Company Secretary
Address: 83 Pirie Street, Adelaide, SA, 5000
Email: adc@estates.com.au
Phone: 08 8223 1488



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