



Privacy Policy

The Central Equity Group understands how highly people value the protection of their privacy.

For that reason, the Central Equity Group takes particular care in dealing with any personal and sensitive information provided to or collected by it from you.

- We will not sell your personal or sensitive information.
- We will ensure that your personal and sensitive information is stored in a secure environment.
- Unsubscribing from our marketing emails is an easy, automated process.
- We comply with the *Australian Privacy Principles (APPs)* as contained in the *Privacy Act 1988 (Cth)* (**Privacy Act**).
- We comply with the *Spam Act 2003 (Cth)* and *CAN-SPAM Act 2003 (USA)*.
- When you visit us online, we use both first party and third party cookies to improve your browsing experience and to assist our marketing efforts.

This privacy policy has been developed in accordance with the Australian Privacy Act and explains the Central Equity Group's practices for the collection, use, disclosure, storage and destruction of your personal and sensitive information.

If you require further information about our privacy practices, please feel free to contact us by e-mail to privacy@centralequity.com.au or by phoning the Privacy Officer on +61 3 9278 8888.

1. Online Access

Access to the Central Equity Group websites (**Sites**) is conditional on your acceptance of the terms of this privacy statement. By your use of the Sites and the provision of your information to us, you consent to the collection, storage, use and dissemination of your personal information in accordance with this privacy statement and as otherwise permitted under the Privacy Act.

We may at any time vary the terms of this privacy statement, and you should check this privacy statement regularly so that you are aware of any variations made. You will be deemed to have consented to such variations by your continued use of the Sites following such changes being made.

2. What information we collect and hold

The kinds of personal and sensitive information we collect and hold from you or about you depend on which Central Equity Group entity you are dealing with, the transaction you have entered into with us, and the services you have engaged us to provide or are interested in. The information that we collect is necessary for and related to the operation of our property development, property management, real estate and accommodation businesses.

When you browse our website or contact us electronically, we may record your IP address, browser type, domain names, access times, referring website addresses, geographical tagging, cookies and statistical data.

The kinds of personal and sensitive information that we may collect from you or about you (depending on which Central Equity entity you are dealing with) include: your name, address, phone, fax and mobile numbers, email address, date of birth, gender, identification details and documents, bank account and credit card details (where relevant). We may also collect details of your occupation, employment history, residential history, income details and insurance policies (where relevant). We may also collect other personal or sensitive information, depending on whether (for example) you are a vendor or purchaser of property, a landlord or a tenant, or a guest.

Even if you are not a client of ours, or even if we only have limited contact with you, we may still collect, hold, use and disclose some personal information about you (for example, if you are a guarantor to a property transaction, or if you are put forward as an emergency or next-of-kin contact).

We may collect sensitive information from you or about you where there is a legal requirement to do so, or where we are otherwise permitted by law. In all other situations, we will specifically request your consent.

3. How we collect and hold information

We aim to collect personal and sensitive information directly from you, unless it is unreasonable or impractical for us to do so. For example, we collect personal and sensitive information from you or about you from letters, emails, online and paper-based application forms, contracts and other documentation submitted to us on any of our Sites, and whether in person, by email, by fax, by mail or over the telephone.

However, in some instances we may receive personal and/or sensitive information about you from third parties, such as associated businesses, Government departments and agencies, local Councils, insurers, banks, solicitors, real estate agents, financial planners and accountants. We may also receive personal and sensitive information about you from your family members, authorised third parties and publicly available sources.

You can be anonymous or use a pseudonym when dealing with us, unless the use of your true identity is a legal requirement, or it is impracticable for us to deal with you on such a basis.

4. Why we collect, hold, use and disclose information

We collect, hold, use and disclose personal and sensitive information from you or about you where it is reasonably necessary for us to carry out our range of business functions and activities. For example, we collect, hold, use and disclose your personal and sensitive information as necessary to complete the sale or purchase of your property, or to manage the tenancy of your property, or to provide requested accommodation services.

As well as for fulfilling any requests you may make to us, the information we collect may be used for related purposes that you would reasonably expect, such as our own internal administrative and accounting functions, our professional and legal obligations (including reporting obligations), to keep you informed about new projects, products, service offerings and initiatives, to invite you to functions and events, to keep you updated with relevant property information, ongoing newsletter communications, conducting feedback requests, the operation of our website portals, statistical collation, website traffic analysis and also to assist the Central Equity Group in its marketing research and improving the services that the Central Equity Group provides.

The entities within the Central Equity Group necessarily work very closely with other businesses, such as law firms, accountants, real estate agents, property valuers, financial planners, insurers, property managers, building contractors, maintenance contractors, booking agencies, banks and tenancy database operators. We may disclose your personal and sensitive information to these third parties where it is reasonably necessary for them to assist us to provide our services to you, or to enable them to provide related service offerings that you have requested.

To assist us in the conduct and maintenance of our business, we may share the information we collect with the other entities in the Central Equity Group, for purposes including the seamless provision of our services and to enable them to provide related service offerings.

We will also share your personal and sensitive information with other third parties where required or permitted by law. If, at any time, we wish to share your personal information with other parties, in circumstances other than those described above, we will seek your consent before doing so.

Where you are a prospective employee or contractor of any entity within the Central Equity Group, we will collect, use, hold and disclose certain personal and sensitive information for purposes related to your prospective recruitment or engagement. In some cases, our recruitment activities may be managed by a third party recruitment agency.

If certain personal and sensitive information is not provided to us, or you do not agree to its collection, use or disclosure as set out in this privacy statement, then we may not be able to provide you with all of the functions and services that we offer.

5. Security of your information

We ensure that our staff involved in the collection, use and storage of your personal and sensitive information are fully aware of and are trained to comply with the requirements of this privacy statement and the Privacy Act. We have physical, electronic and procedural safeguards in place to ensure that your personal and sensitive information is stored in a secure environment. We have established security procedures aimed at ensuring that the personal and sensitive information provided to us is protected from misuse, interference or loss, and from unauthorised access, modification or disclosure. If you reasonably believe that there has been unauthorised use or disclosure of your personal or sensitive information, please contact us at privacy@centralequity.com.au.

We will retain your personal and sensitive information whilst it is required for any of our business functions, or for any other lawful purpose (including mandatory data retention periods). We use secure methods to destroy or permanently de-identify your personal information when it is no longer needed.

We take reasonable steps not to disclose your personal information to overseas recipients unless:

- it is necessary to complete the transaction you have entered into; and
- we have obtained your consent (which may be implied); or
- we believe that the overseas recipient is required to deal with your personal information by enforceable laws which are similar to the requirements under the APPs; or
- we form the opinion that the disclosure will lessen or prevent a serious threat to the life, health or safety of an individual or to public safety; or
- we are taking appropriate action in relation to suspected unlawful activity or serious misconduct; or
- it is otherwise permitted by law.

Some of our administrative, marketing and IT computer systems and platforms are hosted by service providers located overseas. Currently, these hosting service providers are located in USA, UK, Singapore and Thailand. However, from time to time, as our IT systems require, changes may be made and this may affect the location of hosting services.

6. Unsubscribe Process

Where applicable, our forms, whether online or otherwise, give you the opportunity to opt-in for more information about our properties, services and events.

Should you opt-in and later change your mind, you can easily unsubscribe by clicking a link included at the bottom of our emails. This is an automatic process and will take effect immediately.

Alternatively, you may always contact our Privacy Officer to be unsubscribed.

7. Cookies

If you are visiting one of our Sites, please note that our Sites use both first party and third party cookies, tags and tracking settings to store information that help give you a better browsing experience and assist us with our web design, marketing and advertising efforts. Subject to your web browser's settings, we collect information that is sent to us automatically by your web browser when you access our Sites by help of a cookie. A cookie is a small text file that is placed on your computer's hard disk by a web server.

Cookies support the functionality of our Sites and also help us to understand your use of our Sites, i.e. which pages you visit, which links you use, how long you stay on each page and storing information so that forms can be pre-filled or skipped.

Modern web browsers make it easy to clear individual cookies from your computer. Consult your web browser's help files for more info.

Please keep in mind that without cookies, we cannot give you an optimised website experience and some functionality may be disabled.

8. Access to and correction of information

If you wish to know what personal information we have collected about you, you can simply send us an e-mail to privacy@centralequity.com.au and we will, subject to any exemptions allowed under the Privacy Act, provide that information or an outline of that information (as appropriate) as soon as practicable. If you wish to amend or delete the information provided to us, you can send an e-mail to the same address and we will take all reasonable steps to fulfil such a request. If we do not agree to provide you access or to correct the information as requested, we will give you written reasons why.

To assist us to keep our records up-to-date, please notify us of any changes to your personal information.

9. Feedback

We monitor our practices for the collection and use of personal information to ensure that those practices continue to meet our obligations under the Privacy Act. We are grateful for any feedback you may have in relation to our privacy practices. Please e-mail any comments, questions or complaints you may have in relation to our privacy policy or practices to privacy@centralequity.com.au. We will respond to any comments, questions or complaints as soon as we can and in accordance with the relevant provisions of the APPs.

10. Definitions

In this Policy:

- **Personal information** means information or an opinion about an identified individual, or about an individual who is reasonably identifiable.
- **Central Equity Group** means:
 - Central Equity Limited and its subsidiaries;
 - Melbourne Inner City Management Pty Ltd and its subsidiaries;
 - Melbourne Short Stay Apartments Pty Ltd and its subsidiaries; and
 - any other related entity from time to time.

11. Contact

Privacy Officer
Central Equity Limited
32 Power Street,
Southbank Vic 3006, Australia

Telephone: +61 3 9278 8888

Free Call: 1800 638 888

Fax: +61 3 9278 8830

privacy@centralequity.com.au

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