



Privacy Policy

Central Equity Limited (ABN 27 006 708 738) and its related bodies corporate (Central Equity Group, we, our, us) understand how highly people value the protection of their privacy.

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

- We will not sell your personal information.
- We will take steps that are reasonable in the circumstances to ensure that your personal information is stored in a secure environment.
- Unsubscribing from our direct marketing 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)*.
- When you visit our Sites (defined below), we use both first party and third party cookies to improve your browsing experience and to assist our marketing efforts.
- When you visit our Sites, we use web-tracking technologies including “cookies” and “pixel tags” to assist our marketing efforts. The web-tracking technologies collect some personal information and some information that is not personal information because it does not identify you.

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

If you require further information about our privacy practices, please feel free to contact our Privacy Officer using the contact information below.

1. Online Access

Access to the Central Equity Group websites (**Sites**) is conditional on your acceptance of the terms of this privacy policy. 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 policy and as otherwise permitted under the Privacy Act.

We may at any time vary the terms of this privacy policy, and you should check this privacy policy 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. This privacy policy was last updated on the date stated at the end.

2. What is your personal information?

When used in this privacy policy, the term “personal information” has the meaning given to it in the Privacy Act. In general terms, it is any information that can be used to personally identify you. This may include your name, address, telephone number, email address and profession or occupation. If the information we collect personally identifies you, or you are reasonably identifiable from it, the information will be considered personal information.

3. What personal information we collect and hold

The kinds of personal 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 Sites 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. Please also refer to section 9 below.

The kinds of personal 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 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).

4. How we collect and hold personal information

We aim to collect personal information directly from you, unless it is unreasonable or impractical for us to do so. For example, we collect personal 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 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 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. However, if certain personal information is not provided to us, or you do not agree to its collection, use or disclosure as set out in this privacy policy, then we may not be able to provide you with all of the functions and services that we offer, we may not be able to provide you with information about our services, and your experience of our Sites may not be as enjoyable to use. For example, if you do not provide us with your personal information, we may be unable to sell our property to you, sell your property for you or provide our services to you.

5. Why we collect, hold, use and disclose personal information

We collect, hold, use and disclose personal 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 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 our internal business purposes, 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, other marketing activities, conducting feedback requests, the operation of our Sites, 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 information to these third parties where it is reasonably necessary for them to assist us in carrying out our business or 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.

Central Equity Group utilises the services of third parties for marketing purposes, including online platforms and social media platforms, and we will disclose personal information about you to the third party service provider for our marketing purposes. While these third parties generally only use the personal information for our marketing purposes, some may retain certain personal information about you for their own purposes.

We will also disclose your personal 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 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.

6. Direct marketing materials

We may carry out direct marketing communications and information about our products and services that we consider may be of interest to you. These communications may be sent in various forms, including mail, SMS, fax, email and digital advertisement in accordance with applicable marketing laws, such as the *Spam Act 2003* (Cth). You consent to us sending you those direct marketing communications by any of those methods. If you indicate a preference for a method of communication, we will endeavour to use that method whenever practical to do so. In addition, at any time you may opt-out of receiving marketing communications from us by contacting us (see the unsubscribe details below) or by using opt-out facilities provided in the marketing communications and we will then ensure that your name is removed from our mailing list.

7. Security of your information

We ensure that our staff involved in the collection, use and storage of your personal information are fully aware of and are trained to comply with the requirements of this privacy policy and the Privacy Act. We have physical, electronic and procedural safeguards in place that are reasonable in the circumstances to ensure that your personal information is stored in a secure environment. We have established security procedures aimed at ensuring that the personal 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 information, please contact our Privacy Officer using the contact information below.

We will retain your personal 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.

Some of our administrative, marketing and IT computer systems and platforms are hosted by service providers located overseas, and as a result your personal information will be disclosed to recipients 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.

As our Sites are linked to the internet, and the internet is inherently insecure, we cannot provide any assurance regarding the security of transmission of information you communicate to us online. We also cannot guarantee that the information you supply will not be intercepted

while being transmitted over the internet. Accordingly, any personal information or other information which you transmit to us online is transmitted at your own risk.

8. Unsubscribe Process

You can easily let us know that you want to unsubscribe from some or all of our communications by clicking a link included at the bottom of our emails. This is an automatic process and whilst we aim for your request to take effect immediately, it may take several days for our records to be updated. If an advertising campaign is already in production when we receive your request, you may still receive that communication from us. Please note that the Central Equity Group also carries out digital advertising campaigns from time to time that do not rely on your personal information. Your opt-out will not have effect on such advertising campaigns.

Alternatively, you may always contact our Privacy Officer using the contact information below to let us know about your updated communications preferences.

9. Cookies and other tracking technologies

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.

We and our advertising partners also use other web-tracking technologies, such as pixel tags to analyse trends, administer our Sites, track users web movements, gather broad demographic information and other marketing purposes.

10. 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. Where we hold information that you are entitled to access, we will try to provide you with suitable means of accessing it (for example, by mailing or emailing it to you). We may charge you a fee to cover our administrative and other reasonable costs in providing the information to you. We will not charge for simply making the request.

There may be instances where we cannot grant you access to the personal information we hold. For example, we may need to refuse access if granting access would interfere with the privacy of others or if it would result in a breach of confidentiality. If that happens, we will give you written reasons for any refusal.

If you wish to amend the information provided to us, you can send an e-mail to privacy@centralequity.com.au and we will take all reasonable steps to fulfil such a request. If we do not agree to amend 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. We will not charge for making any corrections to your personal information.

11. What is the process for complaining about a breach of privacy?

If you believe that your privacy has been breached, please contact our Privacy Officer using the contact information below and provide details of the incident so that we can investigate it.

We request that complaints about breaches of privacy be made in writing, so we can be sure about the details of the complaint. Our Privacy Officer deals with privacy complaints and any complaints should be directed to our Privacy Officer using the contact details below.

We will attempt to confirm as appropriate and necessary with you your understanding of the conduct relevant to the complaint and what you expect as an outcome. We will inform you whether we will conduct an investigation, the name, title, and contact details of the investigating officer and the estimated completion date for the investigation process.

After we have completed our enquiries, we will contact you, usually in writing, to advise the outcome and invite a response to our conclusions about the complaint. If we receive a response from you, we will assess it and advise if we have changed our view.

If you are not satisfied with the way your privacy-related complaint is handled by us, you may refer your complaint to the Office of the Australian Information Commissioner (OAIC). Details of how to lodge a complaint with the OAIC may be found at www.oaic.gov.au or by calling 1300 363 992.

12. 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 our Privacy Officer.

We will treat your requests, comments or complaints confidentially. We will respond to any comments, questions or complaints in a reasonable time after receipt of your complaint to discuss your concerns and outline options regarding how they may be resolved. We will aim to ensure that your complaint is resolved in timely and appropriate manner.

Please contact Central Equity Group's Privacy Officer at:

Privacy Officer
Central Equity Limited
Post: 32 Power Street, Southbank, VIC 3006 Australia
Tel: +61 3 9278 8888
Email: privacy@centralequity.com.au

This privacy policy was last updated on 14 September 2018.