

Privacy Policy

This policy sets out how Oz Property Group Pty Ltd and its related entities (“**Oz Property Group**”) collects, uses, discloses and manages your personal information and how Oz Property Group complies with the Privacy Act 1988 (Cth) (the ‘Privacy Act’) and the Australian Privacy Principles (‘APPs’), upon which this policy is based.

When used in this privacy policy, the term ‘personal information’ has the same meaning as defined in the Privacy Act. In general terms it is information about you, which identifies you or is information from which you are identifiable. This may include your name, address, telephone number, email address and any information about our dealings with you.

1. Personal information we collect and how we collect your personal information

Oz Property Group collects personal information about you in your interactions with us, for example when you request or use our services, work with us (at our offices or on project sites), communicate with us (by phone, facsimile or email communications) or visit our website.

When you use our website we may collect information about your location or activity including IP address, telephone number and whether you have accessed third party sites. Some of this website information we collect using cookies (for more information, please see Section 3).

In particular, Oz Property Group collects personal information from the following individuals:

- customers, actual or prospective;
- suppliers;
- sub-contractors;
- persons involved with or authorised to deal with or on behalf of corporate customers or suppliers or sub-contractors;
- employees;
- applicants for employment with the Oz Property Group; and
- other individuals who we engage with the Oz Property Group in the ordinary course of business.

The types of personal information, including historical information, we collect include (but is not limited to) information about your identity and contact details.

Oz Property Group may collect your personal information using a variety of methods, including:

- through your access and use of our website;
- through your participation in surveys, online forms, questionnaires, competitions or promotions run by or on behalf of Oz Property Group;
- when you make an enquiry;
- during conversations between yourself and our representatives;
- when you make an offer to acquire a property from one of our developments.

The information collected will generally be used to complete either a written or online form.

2. Use of Personal Information

Uses of Personal Information

We collect, use and exchange your information so that we can:

- verify your identity;
- send marketing communications to you, including by way of email, newsletter, phone call or short message service to inform you of new estates and developments that might be of interest to you;
- deal with your enquiries and concerns;
- administer our products and services to you;
- understand and manage our relationship with you and/or your organisation;
- manage our risks and help identify, detect, investigate and deal with unlawful or illegal activity or misconduct (whether actual or suspected), such as fraud or misrepresentation;
- conduct and improve our businesses and improve the customer experience, including

help manage and enhance our products and services to your needs;

- comply with our legal obligations and assist government and law enforcement agencies or regulators;
- maintain and update our records and carry out other administrative tasks; and
- for such other reasons where permitted by law, for example acquisitions or potential acquisitions of our business or entering into joint ventures with other industry parties.

3. Cookies

Oz Property Group uses cookies on its website and may serve ads when you visit our website or third party websites on which we advertise. In addition to Cookies, Oz Property Group uses web beacons to enable our ad server to recognise a browser's cookie when a user visits our website and to ascertain which banner ads brought the user to our website.

A cookie is a simple text file that is stored on your computer or mobile device by a website's server. Each cookie is unique to your web browser and contains anonymous information such as a unique identifier, the site name, and other personal information. It allows a website to remember things like your preferences, but can also be used to enable companies to target their advertising or marketing messages based on your web browsing history or habits.

Cookies do not by themselves contain information that personally identifies you such as your name and address, however cookies can be used to identify that you have provided such information via an online form.

Cookies are stored on a computer's hard drive, but a cookie cannot access other information stored on a user's hard drive or to obtain contact information.

4. Disclosures and Exchanges of Personal Information

Internal Exchange of Information

We may exchange personal information with other members of the Oz Property Group, so that we may adopt an integrated approach to deal with our customers, suppliers and sub-contractors. Any member of the Oz Property Group may have access and use of this information for any purpose mentioned in Section 2 above.

Paper and electronic records of personal information is centralised for administration and management in Victoria, however some personal information may be transferred or stored interstate.

External Exchange of Information

We may exchange your personal information with third parties, for such purposes mentioned in Section 2 above or where otherwise permitted by law.

Third parties may include from time to time:

- service providers and specialist advisers who have been contracted to provide administrative, financial, research, auditing, accounting, customer and marketing, business and management consulting, banking, payment, delivery, data processing, data analysis, information broking, investigation, website, technology, database or other services, including those to whom we outsource certain functions;
- auditors, insurers and insurance investigators, including insurance brokers to obtain credit insurances for the business;
- lawyers, courts, tribunals and government and law enforcement agencies or regulators, including the Australian Tax Office as require or authorised by law or in accordance with their reasonable information requests;
- employees;
- persons involved in arrangements with the Oz Property Group or any of their individual businesses, including joint venture partners and partnerships;
- persons involved in arrangements that provide funding to the Oz Property Group or any of their individual businesses, including persons who may acquire rights to our assets (including accounts receivables), investors, advisers, trustees and rating agencies; and
- your representatives, agents or advisers and anyone else authorised by you or as specified by you from time to time or in accordance with your relevant contract.

From time to time we may send your information overseas, including to overseas group members and to service providers or other third parties who operate outside of Australia. While such third parties will often be subject to privacy and confidentiality obligations, we shall do all things

reasonably possible to ensure that appropriate data handling and security arrangements are in place. Notwithstanding, where you agree to this Privacy Policy you acknowledge that: (a) they may not always comply with those obligations or those obligations may differ from Australian privacy laws, including the Privacy Act and the APPs; (b) we will not be accountable for the third party under the Privacy Act; (c) you may not be able to seek redress under the Privacy Act; and (d) the third party may be subject to foreign laws which might compel further disclosures of personal information.

5. Additional Information

Job applicants

If you apply for a position with us, we may also collect information about your qualifications, experience, character, screening checks (including health, trade or employment references, background, directorship, financial probity, identity, eligibility to work, vocational suitability, physiological results, drugs/alcohol and criminal record checks).

We collect, use and disclose your personal information to assess your application, conduct screening checks and consider and contact you regarding other positions.

We may exchange your personal information with academic institutions, recruiters, screening check providers, health service providers, professional and trade associations, law enforcement agencies, referees and your current and previous employers. Without your personal information we may not be able to progress considering you for positions with us.

Employees and Sub-Contractors

This section applies to our current and former employees and contractors, in addition to the 'Job applicants' section above.

We may collect information relating to your current or former employment or engagement including trade references or information about your training, disciplining, resignation, termination, terms and conditions, emergency contact details, performance, conduct, use of our IT resources, payroll matters, union or professional/trade association membership, recreation, leave and taxation, banking or superannuation affairs. We are required or authorised to collect your personal information under various laws including the *Fair Work Act*, *Superannuation Guarantee*

(Administration) Act and *Taxation Administration Act*.

We collect, use and disclose your personal information for purposes relating to your employment or engagement with us including engagement, licenses (current or prospective), training, disciplining, payroll, superannuation, health and safety, administration and information), insurance (including WorkCover), next-of-kin details and staff management purposes.

We may exchange your personal information with your representatives (including unions) and our service providers including providers of payroll, banking, staff benefits, surveillance and training services. Without your personal information we may not be able to effectively manage your employment or engagement.

Please note that companies within the Oz Property Group are not bound by the APPs in relation to handling of their own current or former employees' records where directly related to the employment relationship. We may rely on this exemption notwithstanding this Privacy Policy.

6. Management, Storage and Protection of Personal Information

We hold personal information electronically and in hard copy form, at our premises in Victoria, on computer systems and servers centralised in Victoria and/or at offsite facilities using trusted third parties. We implement a range of measures to protect the security of that personal information, including but not limited to confidentiality requirements and education, document storage security policies, system and network security measures such as firewalls and data encryption, and, building and surveillance security. Our staff, contractors and others to whom we choose to disclose personal information to are required to maintain confidentiality over personal information we hold.

We are also required to take reasonable steps to destroy or de-identify personal information when no longer needed for any permitted purpose.

7. Accessing, updating and correcting your Personal Information

Accessing your Personal Information

We ask that you contact us, in writing, to request access to your personal information.

We will work with you to deliver and/or make available the information to you in a timely and

efficient manner following your request. Before we give you the information, we will need to confirm your identity.

There is no fee for making the initial request, but in some cases there may be an access charge to cover the time we spend locating, compiling and explaining the information you ask for. If there is an access charge, we will give you an estimate up front and confirm that you would like us to proceed. Generally, the access charge is based on an hourly rate plus any photocopying costs or other out-of-pocket expenses. You will however need to make the payment before we initiate the process, unless you have otherwise authorised us to debit your account.

In certain circumstances we are allowed to deny your request, or limit the access we provide. For example we might not provide you access to commercially sensitive information. In such cases, we will write to you explaining our decision and give you an opportunity to discuss our position.

Updating and Correcting your Personal Information

We realise that your personal information may change frequently.

We ask that you help us to ensure that the personal information we hold about you is accurate and up-to-date. Please contact us promptly to inform us of any changes to your personal information.

8. Privacy Complaints

If you have a concern about your privacy, you have a right to make a complaint and we will do everything we can to deal appropriately with your complaint.

To lodge a complaint, please contact us, by phone or in writing, using your point of contact or alternatively using the contact details listed below.

We acknowledge every complaint we receive and provide our name and contact details of the person investigating the complaint. We will use all reasonable endeavours to keep you updated on the progress of your complaint and our resolution if any.

Usually, it takes only a few days to resolve a complaint. However, if we are unable to provide a final response within thirty (30) days, we will contact you to explain why and discuss a timeframe to resolve the complaint.

9. Contact Details

You can contact Oz Property Group about a privacy-related issue by phone, post or electronic communications:

Oz Property Group Melbourne Office

Address: 5/9 Church Street, Hawthorn Victoria
Australia

Telephone: +61 3 9853 1388

Email: info@ozpropertygroup.com.au

10. Updates to our Privacy Policy

Our Privacy Policy will be reviewed from time to time to take account of new laws and technology, changes to our operations and practices and the changing business environment.

Last updated: December 2016