

Premium Advisory Real Estate's Privacy Policy

Premium Advisory Real Estate Properties Pty Ltd (ABN 96 631 789 305) and their subsidiaries and related companies, including subsidiaries and related companies that may be formed in the future and which provide you a copy of, link to or direct you to this Privacy Policy (collectively in this Privacy Policy referred to as “**we**”, “**us**”, “**our**” or “**our companies**”) respect the privacy of your personal information. We are bound by and adhere to the Privacy Act 1988 (Cth) and the Australian Privacy Principles under that Act (“**Privacy Act**”), as amended from time to time.

This Privacy Policy sets out the manner in which we handle and manage all personal information we collect about you as a customer, supplier, visitor to, or the websites of our related entities (“**our websites**”) or person making an enquiry directed to us, whether such information is provided to us by you or a third party and whether via the internet, in person, over the phone or otherwise.

By providing your personal information to us, making enquiries of us or using any of our services, you consent to the collection, use and disclosure of your personal information, as that term is defined in the Privacy Act including any sensitive information we collect about you and your name, address, email address, copy of your identification documents and any other personal information you give us or which we otherwise collect about you (“**personal information**”), in accordance with and for the purposes set out in this Privacy Policy.

The types of personal information we collect

Except as expressly noted in this Privacy Policy, we will not collect, use or disclose your sensitive information (such as information relating to race or ethnicity, criminal record, religious beliefs, sexuality and health information) unless such is necessary for us to perform our services or unless we are permitted or required by law or a court or tribunal order to do so.

How we collect your personal information

We may collect your personal information in several ways: from you directly when you deal with us including via our websites, over the phone (e.g. where you speak to one of our agents), face-to-face (e.g. at one of our display apartments), by email and/or by you completing a form (e.g. on paper, on one of our websites or on an electronic device at one of our display apartments).

There may be instances where we collect personal information about you other than directly from you. Examples include:

- publicly available information and databases;
- information from your landlord or tenant;
- information from your employer and/or referees nominated by you;
- credit information from credit reporting agencies;

- information from property agents and property valuers who may be involved in the services we provide or with whom you have discussed your interest in our developments; and
- information from market research companies contracted by us to assist in improving and/or marketing our services.

We may also collect certain personal information about individuals other than you (e.g. a friend or family member who you tell us may be interested in one of our developments). In such instances you must not provide us this personal information unless you have informed them that their personal information will be provided to us and will be handled by us in accordance with this Privacy Policy, direct them to where they can find a copy of this Privacy Policy and have obtained their consent to provide their personal information to us.

When you visit our websites we may also obtain de-identified/anonymous information from your computer, without your knowledge, through the use of cookies. A cookie is a piece of information that is put out by our web server and stored on your computer. It does not identify you or give us access to your computer but it does enable our computer to recognise your computer each time you visit any of our websites and provide certain statistical information. You can set your computer not to accept or store cookies if you wish.

Regardless of how we collect your personal information, we will handle it in accordance with this Privacy Policy and the Privacy Act.

What we use your information for

We will generally collect, hold, use and disclose your personal information only for the purposes set out in this Privacy Policy or, otherwise, which we notify you of at the time of collection, permitted secondary purposes and as permitted or required by law or court or tribunal order. These purposes are:

- responding to your enquires and communicating with you, from time to time, to maintain contact and keep you updated on the developments and/or services you have expressed interest in or requested information about and providing you with market research and promotional materials such as reports, newsletters, event invitations and/or property information relating to our developments or rental opportunities, which we believe may be of interest to you (“**direct marketing communications**”);
- where you decide to purchase a property, undertaking the process of selling that property to you;
- where you decide to lease a property, undertaking the process of leasing that property to you:
- acting as an agent for the landlord in relation to the management, valuation or leasing of a property;
- understanding your individual profile as a user of our services, including your ability to meet your financial obligations;

- acting as an agent for a tenant in relation to the leasing or valuation of a property;
- acting as an agent for vendors or purchasers in relation to the sale of property;
- forecasting future needs for our services, improving our services and general quality assurance;
- engaging in legal proceedings and/or enforcing judgments and/or orders; and
- any other purposes identified at the time of collecting your personal information.

If you decide that you no longer wish to receive direct marketing communications from us you may use the unsubscribe facility in the marketing communication or contact us using the details noted under “Our contact details” below. We will stop using your personal information for direct marketing within 30 days of receiving your request to unsubscribe.

Disclosure of personal information

We may also disclose your personal information to third parties for the purposes outlined above. Such third parties include:

- third party service providers, contractors consultants, agents, credit reporting agencies and/or representatives (e.g. tradespersons, law firms, banks, financial institutions, insurers, IT providers and/or mortgage referral services providers) who provide services to us or on our behalf including to conduct valuations, market research, assist in obtaining payments from creditors and providing advice;
- media/marketing organisations for the purposes of promoting us or our services;
- anyone authorised by you to deal with us on your behalf;
- any of our related companies; and
- any other third party or parties identified at the time of collecting your personal information.

Where your personal information is disclosed to a third party in Australia, it will be handled according to that third party’s privacy practices. You should familiarise yourself with those third parties’ privacy policies.

We do not disclose your personal information to overseas recipients except to our [technology support and cloud provider] in Germany and the USA who may access your personal information to resolve a technical issues but who cannot extract/download any personal information from our systems. In addition, we use a customer relationship management (CRM) service provider whose data centres are located in the United States and Japan but they do not access your personal information.

We will not disclose your personal information to a third party for any other purpose, unless required or permitted by law or a court or tribunal order to do so.

Access, update and correction of personal information

We take reasonable steps to ensure that any personal information held by us about you is accurate, complete and up-to-date. However, we require you to advise us of any changes to your personal information. Some individuals are able to access their personal information via their online account that they have with us. If you are able to do this, we request that you ensure this information is kept accurate, complete, relevant and up-to-date.

You may request access to your personal information at any time by contacting us using the details noted under “Our contact details” below, including for the purpose of correcting or updating that information. There is no charge for making such a request or providing you access to your personal information. We will respond and deal with your request within a reasonable period of time from the time it is made.

If we refuse to provide you access we will provide you with a written notice that outlines the reasons for the refusal.

Security of personal information

We take reasonable steps to protect your personal information from misuse, interference, loss and from unauthorised access, alteration and disclosure. However, our data protection measures are not a guarantee of the security of your personal information. You must also take care to protect your personal information. Please notify us as soon as possible if you become aware of any security breaches.

Third party websites

Our websites may contain links to the websites of other entities. If you click the links to other entities' websites you should read their privacy policy to find out how they handle your personal information when you visit their site. We do not accept any responsibility or liability for the privacy of your information, including your personal information, on any other website and we have no control over (or responsibilities for) the privacy practices of those entities.

Changes to this Privacy Policy

We may, from time to time, update this Privacy Policy so please ensure you review it periodically for changes. If any changes are significant or substantial we will either advise you in writing or post a message to that effect on our websites.

Your continued use of our services and/or our websites, requesting our services or the provision by you of further personal information to us (directly or through an authorised person) after this Privacy Policy has been revised will be deemed to be your acceptance of the revised Privacy Policy.

What if you have a complaint?

If you wish to make a complaint about an alleged breach of this Privacy Policy or the Privacy Act by us you can contact us by using the contact details below. You will need to provide us sufficient detail regarding your complaint and any supporting evidence. Our Privacy Officer will investigate the issue and determine the steps to be taken to resolve the complaint. We will notify you in writing if we require any additional information and also of the outcome of the investigation. If you are not happy with the outcome of our investigation you may complain to the Office of the Australian Information Commissioner ("**OAIC**") whose contact details can be obtained from the OAIC website noted below under "Further information".

Our contact details

To access your information or if you wish to make a complaint to us or if you have any queries about this Privacy Policy, please contact us by email at contact@premiumadvisory.realestate or 1300 383 820.

Further information

For further information about the Privacy Act or to make a complaint to the Privacy Commissioner, please see the website of the OAIC at www.oaic.gov.au.