

Urban DC. Privacy Policy

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Status: Current

1. Background

1.1 General

Urban DC Pty Ltd ACN 165 641 789 (**Urban DC/we/us**) is a property development company based in Melbourne, Australia. It is committed to protecting your privacy, in accordance with applicable Australian privacy laws.

This Policy is designed to give you a greater understanding of how we collect, use, disclose and otherwise handle personal information.

A copy of this Privacy Policy is available on our website at www.urban-DC.com.au or you can request a copy by contacting our Privacy Officer (details under heading 11 below).

1.2 What is personal information?

Personal information means information or an opinion, whether true or not and whether recorded in a material form or not, about an individual who is identified or reasonably identifiable.

1.3 Our obligations

We are required to comply with the Australian Privacy Principles (**APPs**) in the *Privacy Act 1988* (Cth) (**Privacy Act**). The APPs regulate the manner in which personal information is handled throughout its life cycle, from collection to use and disclosure, security, accessibility and disposal.

We are also required to comply with more specific privacy legislation in some circumstances, such as:

- applicable State and Territory health privacy legislation (including the Victorian *Health Records Act*) when we collect and handle health information in the relevant jurisdiction; and
- the *Spam Act* and the *Do Not Call Register Act*.

1.4 Employee records

We are generally exempt from the Privacy Act when we collect and handle employee records and this Privacy Policy does not apply to that information. However, where State or Territory health privacy legislation applies, we are still required to protect the privacy of employee health information. This Privacy Policy will apply in those circumstances.

2. What we collect

2.1 General

The type of personal information that we collect about you depends on the type of dealings you have with us. For example, if you:

- **are a purchaser or prospective purchaser of a property** – we will collect your name, age, address, contact details, details of the property that you are interested in or have agreed to purchase (such as the location and size of the property and the design and specifications of

the apartment), what prompted you to inspect the project, how you heard about us, details of price points and apartment types you are interested in (eg one bedroom or two bedroom) and whether you are an owner-occupier or investor. If you are purchasing from us, we will also collect a copy of your passport or driver's licence (to verify your identity), confirm whether you are an Australian resident and record the terms of your contract (including price), payment details, information relating to your financing arrangements (such as your bank details and how much money you are borrowing) and contact details for your authorised representatives (such as your lawyer)

- **are a supplier to us** - we will collect your name and contact details, details about the goods or services you supply and payment details
- **send us an enquiry, complete an enquiry form or provide us with feedback**, we may collect your name, contact details, details of your enquiry or feedback and information about our response
- **fill in a contact form at one of our display suites** – we will collect your name, age, address, contact details, details of the properties you are interested in (including price ranges), what prompted you to inspect the project, whether you are an owner occupier or investor and how you heard about us or the relevant property development
- **participate in market research conducted by us or on our behalf** – we will collect your name, address, contact details and details of your responses to the research questions you answer
- **ask us to send you information about our products and services** - we will collect your name, address, contact details, details of the properties you are interested in and how you heard about us or the relevant property development
- **apply for a job with us**, we will collect the information you include in your job application, including your cover letter, resume, contact details and referee reports

2.2 Sensitive information

Sensitive information is a subset of personal information that is generally afforded a higher level of privacy protection, such as health information. We only collect sensitive information where it is reasonably necessary for our functions or activities and either:

- the individual has consented; or
- we are required or authorised by or under law to do so.

For example, if you purchase a property from us, we will collect information about your residency status, which may indicate your racial or ethnic origin.

2.3 Collection of information other than personal information through our website

When you visit our website, some of the information that is collected about your visit is not personal information, as it does not reveal your identity.

Site visit information

For example, we record your server address, the date and time of your visit, the pages you visited, any documents you downloaded, the previous site you visited and the type of device, browser and operating system you used.

We use and disclose this information in anonymous, aggregated form only, for purposes including statistical analysis and to assist us to improve the functionality and usability of our website. You are not individually identified, however we reserve the right to use or disclose this information to try to

locate an individual where we reasonably believe that the individual may have engaged in any unlawful or inappropriate activity in connection with our website, or where we are otherwise required or authorised by law to do so.

Cookies

A cookie is a small string of information that a website transfers to your browser for identification purposes. The cookies we use do not identify individual users, although they do identify the user's internet browser.

We use cookies to hold anonymous session information. This information is used to personalise your current visit to the website, for example to allow the website to remember who you are by keeping server variables linked to your session.

We only use non-persistent cookies. That is, they are held on your browser's memory only for the duration of your session.

Most internet browsers are set to accept cookies. If you prefer not to receive them, you can adjust your internet browser to reject cookies, or to notify you when they are being used. There are also software products available that can manage cookies for you. Rejecting cookies can, however, limit the functionality of our website.

2.4 What if you don't provide us with your personal information?

We will provide individuals with the option of not identifying themselves, or of using a pseudonym, when dealing with us if it is lawful and practicable to do so. A pseudonym is a name or other descriptor that is different to an individual's actual name.

For example, you can access our website and make general phone queries without having to identify yourself.

In some cases however, if you don't provide us with your personal information when requested, we may not be able to provide you with the product or service that you are seeking. For example, you must identify yourself to a member of our accounts team in order to check on the status of a payment made to or by us.

3. How we collect personal information

3.1 Methods of collection

We may collect personal information in a number of ways, including:

- in person (for example, visits to our head office or properties we are developing, at events or at conferences)
- through our website (for example through our 'Enquiries' form)
- through our Facebook page
- over the telephone
- through written correspondence (such as letters, faxes and emails)
- on hard copy forms (for example, enquiry forms and surveys)
- through surveillance cameras at our corporate premises and on some of our display suites or development sites

- from third parties, including:
 - the Land Titles Office
 - relevant State and Territory Valuers General
 - real estate agents
 - Australian Securities and Investment Commission
 - mortgage brokers and/or financial service providers

3.2 Collection notices

Where we collect personal information about you, we will take reasonable steps to provide you with certain details about that collection (such as the purpose for which we are collecting the information and the type of third parties to which it is usually disclosed). We will generally include this information in a collection notice.

Collection notices provide more specific information than this Privacy Policy. The terms of this Privacy Policy are subject to any specific provisions contained in collection notices and in the terms and conditions of particular offers, products and services. We encourage you to read those provisions carefully.

3.3 Unsolicited information

Unsolicited personal information is personal information we receive that we have taken no active steps to collect (such as an employment application sent to us by an individual on their own initiative, rather than in response to a job advertisement).

We may keep records of unsolicited personal information if the Privacy Act permits it (for example, if the information is reasonably necessary for one or more of our functions or activities). If not, we will destroy or de-identify the information as soon as practicable, provided it is lawful and reasonable to do so.

4. Why we collect personal information

4.1 General

The main purposes for which we collect, hold, use and disclose personal information are set out below:

- outlining our development products and services to prospective and existing purchasers
- completing sales transactions and assisting purchasers with the management of their apartment upon completion of a development
- promoting ourselves and our products and services, including through direct marketing, events and competitions (see under heading 4.2 below)
- obtaining products and services for our business
- obtaining finance for our developments
- performing research and statistical analysis, including for customer satisfaction and service improvement purposes

- protecting the security of our offices, staff, customers and the property held on our premises
- answering queries and resolving complaints
- recruiting staff and contractors

We may also collect, hold, use and disclose personal information for other purposes explained at the time of collection or:

- which are required or authorised by law; or
- for which you have provided your consent.

4.2 Direct marketing

We may use or disclose your personal information to let you know about us and our products and services (including promotions, special offers and events), either where we have your express or implied consent, or where we are otherwise permitted by law to do so. We may contact you for these purposes in a variety of ways, including by mail, email, SMS, telephone and facsimile.

Opting out

Where you have consented to receiving marketing communications from us, your consent will remain current until you advise us otherwise. However, you can opt out at any time, by:

- contacting us (details under heading 11 below)
- advising us if you receive a marketing call that you no longer wish to receive these calls
- using the unsubscribe facility that we include in our electronic messages (such as emails, SMS and MMS),

Notification of source

If we have collected the personal information that we use to send you marketing communications from a third party (for example a direct mail database provider), you can ask us to notify you of our source of information, and we will do so, unless this would be unreasonable or impracticable.

5. Who we may share your personal information with

We may share personal information with third parties where appropriate for the purposes set out under heading 4, including:

- land vendors
- sub-contractors
- suppliers of fixtures and fittings
- the Land Titles Office
- relevant State and Territory Valuers General
- real estate agents
- Australian Securities and Investment Commission

- financiers and prospective financiers
- financial institutions for payment processing
- an individual's agent or authorised representative
- referees whose details are provided to us by job applicants
- mortgage broker, financial planner and banks if they make enquiries of us
- owners corporation managers and managing / letting agents
- our contracted service providers, including:
 - suppliers of building materials and fittings;
 - delivery and shipping providers
 - information technology and data storage providers
 - venues and event organisers
 - marketing and communications agencies
 - research and statistical analysis providers
 - call centres
 - mail houses
 - external business advisers (such as consultants, recruitment advisors, accountants, auditors and lawyers)

In each case, we may disclose personal information to the service provider and the service provider may in turn provide us with personal information collected from you in the course of providing the relevant products or services.

6. Cross border disclosure of personal information

We do not currently disclose personal information to third parties located overseas. If this changes at some time in the future, we will comply with the requirements of the Privacy Act that apply to cross border disclosures of personal information and this Privacy Policy will be amended accordingly.

7. Use of government related identifiers

We will not:

- use a government related identifier of an individual (such as a Medicare number or driver's licence number) as our own identifier of individuals; or
- otherwise use or disclose such a government related identifier,

unless this is permitted by the Privacy Act (for example, use of an identifier to verify an individual's identity or uses or disclosures required or authorised by or under an Australian law).

8. Data quality and security

8.1 General

We hold personal information in a number of ways, including in electronic databases, email contact lists, and in paper documents held in drawers and cabinets. Paper files may also be archived in boxes and stored offsite in secure facilities. We take reasonable steps to:

- make sure that the personal information that we collect, use and disclose is accurate, up to date and complete and (in the case of use and disclosure) relevant;
- protect the personal information that we hold from misuse, interference and loss and from unauthorised access, modification or disclosure; and
- destroy or permanently de-identify personal information that is no longer needed for any purpose permitted by the APPs.

You can help us keep your information up to date, by letting us know about any changes to your details, such as your address, email address or phone number.

8.2 Security

The steps we take to secure the personal information we hold include website protection measures (such as firewalls and anti-virus software), security restrictions on access to our computer systems (such as login and password protection), controlled access to our corporate premises, policies on document storage and security, personnel security (including restricting access to personal information on our systems to staff who need that access to carry out their duties, staff training and workplace policies.

Online credit card payment security

We process payments using EFTPOS and online technologies. All transactions processed by us meet industry security standards to ensure payment details are protected.

Website security

While we endeavour to protect the personal information and privacy of users of our website, we cannot guarantee the security of any information that you disclose online and you disclose that information at your own risk. If you are concerned about sending your information over the internet, you can contact us by telephone or post (details under heading 11 below).

9. Access and Correction

9.1 General

Please contact our Privacy Officer (details under heading 11 below) if you would like to access or correct the personal information that we hold about you. We may require you to verify your identity before processing any access or correction requests, to make sure that the personal information we hold is properly protected.

9.2 Access

We will generally provide you with access to your personal information, subject to some exceptions permitted by law. We will also generally provide access in the manner that you have requested (eg by providing photocopies or allowing a file to be viewed), provided it is reasonable and practicable for us

to do so. We may however charge a fee to cover our reasonable costs of locating the information and providing it to you.

9.3 Correction

If you ask us to correct personal information that we hold about you, we will take reasonable steps to correct that information.

9.4 Timeframe for access and correction requests

Except in the case of more complicated requests, we will endeavour to respond to access and correction requests within 30 days.

9.5 What if we do not agree to your request for access or correction?

If we do not agree to your access or correction request, or if we do not agree to give you access in the manner you requested, we will provide you with a written notice setting out:

- the reasons for our decision (except to the extent that, having regard to the grounds for refusal, it would be unreasonable to do so); and
- available complaint mechanisms.

In addition, if we refuse to correct personal information in the manner you have requested, you may ask us to associate your request with the information and we will take reasonable steps to do so.

10. Complaints

If you have a complaint about how we have collected or handled your personal information, please contact our Privacy Officer (details under heading 11 below).

We will endeavour in the first instance to deal with your complaint and take any steps necessary to resolve the matter within a week. If we are not able to do so, we will ask you to submit your complaint in writing.

In most cases, we expect to investigate written complaints and provide a response within 30 days of receipt. If the matter is more complex and our investigation may take longer, we will contact you and tell you when we expect to provide our response.

If you are not satisfied with our response, you can refer your complaint to the Office of the Australian Information Commissioner (see <http://www.oaic.gov.au/privacy/privacy-complaints> for further information).

11. Our contact details

Please contact us if you have any queries about the personal information that we hold about you or the way we handle that personal information. Our contact details are set out below.

Email: info@urbandc.com.au

Further general information about privacy is available on the website of the Office of the Australian Information Commissioner at www.oaic.gov.au or by calling the OAIC's enquiry line at 1300 363 992.

12. Changes to this Policy

We may amend this Privacy Policy from time to time. The current version will be posted on our website and a copy may be obtained by contacting our Privacy Officer (details above).