

Privacy Policy

OVERVIEW

This privacy policy ("Privacy Policy") sets out how Azinna Pty Ltd ABN 83 941 375 496 ("Azinna") and our related bodies corporate ("we", "our", "us") collect, store, use, protect, share and disclose your personal information having regard to the Australian Privacy Principles ("APPs") contained in the *Privacy Act 1988* (Cth) ("Privacy Act"). It applies to this website and all related websites, web and mobile applications, services and tools (together the "Website"). By visiting or using the Website you agree to the collection, storage, usage and disclosure of your personal information by us in the manner described in this Privacy Policy.

This Privacy Policy does not constitute a contractual representation, promise, guarantee or warranty by Azinna to you as to the manner in which we will or may collect, store, use, disclose, protect or otherwise handle your personal information. This Privacy Policy applies to Azinna and its related entities, such as its subsidiaries, and their employees. These related entities comply with the same obligations that Azinna has to protect your personal information under this Privacy Policy.

From time to time we will review our Privacy Policy. We will notify you about any changes to our Privacy Policy at any time by posting an updated version of the Privacy Policy on the Website.

PERSONAL INFORMATION

'Personal information' is information or an opinion relating to an individual which can be used to identify that individual. This may include your name, address, telephone number, email address and profession or occupation.

WHY WE COLLECT PERSONAL INFORMATION

We collect personal information in connection with providing, administering, improving and personalising our services ("Services") and for marketing and communication purposes for leasing opportunities.

HOW WE COLLECT PERSONAL INFORMATION

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

- (a) when you provide information directly to us through the Website, in person, by phone or in writing (whether by email, during face to face meetings);
- (b) when you visit and/or use the Website, in which case we record information sent to us by your computer, mobile device or other device you are using to access the Website;
- (c) by dealing or contracting with us; and
- (d) from third parties such as related entities and representatives (including during conversations between you or your agents and our representatives or agents), service providers to us, operators of linked websites, applications and advertising on the Website.

In some circumstances, personal information is provided to us by third parties or other organisations conducting activities on your behalf. With your express or implied consent, your personal information may be used and disclosed to us this way.

WHAT PERSONAL INFORMATION WE COLLECT AND HOLD

We may collect the following types of personal information in order to provide you with our Services:

- (a) contact details including your name, address, email and telephone numbers;

- (b) details of your agents and service providers such as your lawyer or finance provider;
- (c) dates of birth, gender and information to verify your identity;
- (d) bank account details, credit card details and other financial details;
- (e) details of properties and rental services that we have previously provided to you or which you have enquired about, together with any other information we require to rent a property or properties to you;
- (f) personal information from your interaction with the Website and its content, our Services and our advertising, including without limitation device identifiers, device type, geo-location information, connection information, statistics on page views, traffic to and from the Website, mobile network information, time, date, referring URL, the type of operating system and browser, ad data, IP address and standard web log data; and
- (g) any other information we consider may assist us in providing or marketing our Services.

We understand the importance of protecting children's privacy. The Website including related sites such as our Facebook, Twitter, Snapchat, LinkedIn or other social media pages are not intentionally designed for or directed at children.

Generally we do not collect sensitive information as defined under the Privacy Act. Sensitive information is defined in the Privacy Act as information or an opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information.

If we do collect this information, we will only do so with your consent or where required or authorised by law.

AUTOMATIC COLLECTION OF YOUR PERSONAL INFORMATION

When you visit or use our Website or social media pages, our Internet Service Provider automatically records the following information about you:

- (a) your server address;
- (b) the website you visited immediately prior to ours;
- (c) your domain name;
- (d) date and time of your visit to our Website;
- (e) pages you accessed and the information or documents you downloaded;
- (f) type of browser you used; and
- (g) any other information we request our Internet Service Provider to record from time to time.

Sometimes we hire third-party analytics providers to help us understand how people are using our services. Third parties may include search engines, providers of measurement and analytics services, social media networks, and advertising companies.

HOW PERSONAL INFORMATION IS USED

Our principal purpose in collecting, using and storing your personal information is to provide the Services in a personalised, safe and efficient manner. You consent to us collecting, using, storing, sharing and disclosing your personal information to:

- (a) provide you with appropriate information and rental services;
- (b) send marketing communication to you regarding new estates, developments and investment opportunities that we manage which may be of interest to you;
- (c) conduct our business, generate content and provide customer support;
- (d) to provide your updated personal information to our related bodies corporate, contractors, franchisees, franchisees' real estate agents and employees or service providers;
- (e) provide, administer, market and manage the Services;
- (f) research, develop and improve the Services;
- (g) communicate with you;
- (h) conduct surveys to determine use and satisfaction with the Services;
- (i) detect, investigate and prevent potentially unlawful acts or omissions or acts or omissions with the potential to breach our Terms of Use, this Privacy Policy or any other policy;
- (j) enforce our Terms of Use, this Privacy Policy or any other policy;
- (k) verify information for accuracy or completeness (including by way of verification with third parties);
- (l) comply with our legal obligations, a request by a governmental agency or regulatory authority or legally binding court order;
- (m) combine or aggregate your personal information with information we collect from third parties and use it for the purposes set out this Privacy Policy;
- (n) resolve disputes and to identify, test and resolve problems;
- (o) notify you about the Website and updates to the Website from time to time;
- (p) supply you with generalised, targeted or personalised marketing, advertising and promotional notices, offers and communications, and measure and improve our marketing, advertising and promotions based on your preferences; or
- (q) protect a person's rights, property or safety.

If you access the Website from a shared device or a device of a third party (such as in an internet café), your personal information may also be available to other persons who access that device.

DISCLOSURE OF PERSONAL INFORMATION

We may disclose your personal information to third parties for the purposes contained in this Privacy Policy, including without limitation to:

- (a) our representatives and your authorised representatives including agents;

- (b) related bodies corporate;
- (c) service providers for the purposes of operation of our website or our business, fulfilling requests by you, and to otherwise provide information and rental services to you including, without limitation, web hosting and web service providers, IT systems administrators, mailing houses, couriers, payment processors, network service providers, text messaging providers, satellite communication providers, data entry service providers, electronic network administrators, debt collectors, utilities providers, and professional advisors such as accountants, solicitors, business advisors and consultants and other third party providers deemed necessary for the Services to operate;
- (d) other companies or individuals who may assist us in providing you with appropriate information and rental services such as real estate agents;
- (e) individuals and companies that engage our services in relation to the relevant estate;
- (f) our related bodies corporate;
- (g) our professional advisors, auditors and insurers;
- (h) third parties to whom you expressly ask us to send, or consent to us sending, your personal information;
- (i) government and regulatory authorities and other similar organisations, as required or authorised by law; and
- (j) such entities that we propose to merge with or be acquired by.

We will take reasonable steps to ensure that anyone to whom we disclose your personal information respects the confidentiality of the information and abides by any applicable privacy laws. Where possible, Azinna will put in place confidentiality arrangements with third parties to ensure this information is only used to carry out functions on our behalf. In the event we use any of your data for commercial use, the use of your data will be anonymised.

We will not share, sell, rent or disclose your personal information in ways different from what is disclosed in this Privacy Policy.

IF WE CAN'T COLLECT YOUR PERSONAL INFORMATION

If you do not provide us with the personal information we have requested, we may not be able to provide you with appropriate information and rental services or fulfil one of our primary functions and activities.

OVERSEAS DISCLOSURE

Some of our service providers are located overseas. As a result, some of the personal information we collect and hold may be disclosed to overseas recipients including those operating in a foreign jurisdiction for the purposes identified above. Others to whom we disclose personal information are required to maintain confidentiality over the personal information we hold.

We take reasonable steps to ensure that the overseas recipients of your personal information do not breach the privacy obligations relating to your personal information.

We may disclose your personal information to entities within Australia who may store or process your data overseas. In the event that a disclosure is made in an overseas country (which we consider unlikely), the information will not be protected by the APPs. In any event, by providing your details, you consent to your information being disclosed in this manner.

USE OF COOKIES

We (or a third party providing services to us) may use cookies, pixel tags, "flash cookies", or other local storage provided by your browser or associated applications (each a "Cookie" and together "Cookies"). A Cookie is a small file that may be placed on your computer when you visit the Website. Cookies are used on some parts of the Website. Most browsers now recognise when a cookie is offered and permit you to refuse or accept it. If you are not sure whether your browser has this capability, you should check with the software manufacturer, your company's technology help desk or your internet service provider. If Cookies are disabled, we may not be able to provide you with the full range of our Services.

Cookies may collect and store your personal information. This Privacy Policy applies to personal information collected via Cookies. You consent and acknowledge that we collect your personal information through Cookies.

Cookies may be used to provide you with the Services, including to identify you as a user of the Website, remember your preferences, customise and measure the effectiveness of the Website and our promotions, advertising and marketing, analyse your usage of the Website, and for security purposes.

You also may encounter Cookies used by third parties and placed on certain pages of the Website that we do not control and have not authorised (such as webpages created by another user). We are not responsible nor liable for the use of such Cookies.

The Website is hosted by an online service provider which may change from time to time. Our service providers' use of Cookies is not covered by our Privacy Policy.

STORAGE AND SECURITY

We store, protect and process your personal information by taking reasonable steps. The reasonable steps we take include protecting the information from misuse or loss and from unauthorised access, modification or disclosure.

We do so by ensuring that:

- (a) your personal information is stored by our leasing agent Colliers, within secure shared drive systems (including SharePoint and OneDrive) that are password protected; and
- (b) the Colliers team and authorised agents are obliged to respect the confidentiality of any personal information held in the shared drive systems.

Where we no longer require your personal information, we will take reasonable steps to destroy it.

The transmission and exchange of information is carried out at your own risk. We cannot guarantee the security of any information that you transmit to us or receive from us. Although we take measures to safeguard against unauthorised disclosures of information, we cannot assure you that personal information that we collect will not be disclosed in a manner that is inconsistent with this Privacy Policy.

CHANGE OF CONTROL

If Azinna sells, assigns or otherwise transfers part or the whole of its business, your personal information, which was collected by Azinna through your use of our services or website, may be among the items transferred or sold to the extent that it is relevant to the business.

ACCESS TO INFORMATION

Subject to the Privacy Act, you may request to access the personal information we hold about you at any time by emailing us at the address listed under "Contact Us" below. You may also ask us to correct information about you that you believe is inaccurate, incomplete or out of date. All requests for access or correction will be processed within a reasonable time. We will need to verify your identity before giving you access to, or correcting, your personal information,

In certain instances we may not be required or able to provide you with access to your personal information. If this occurs we will give you reasons for our decision not to provide you with such access to your personal information in accordance with the Privacy Act.

There is no application fee for making a request to access your personal information. However, we may charge an administrative fee for the provision of information in certain circumstances such as if you make repeated requests for information or where the information is held by a third party provider.

We endeavour to ensure that the personal information it holds is accurate, complete and up-to-date. If you believe the personal information we hold is inaccurate, please let us know and generally we will amend it upon request. If we disagree with your request, we will only do so on reasonable grounds and we will let you know the reasons for the refusal.

NOTIFIABLE DATA BREACHES

In the event that there is a data breach and we are required to comply with the notification of eligible data breaches provisions in Part IIIC of the Privacy Act or any other subsequent sections or legislation which supersede this Part IIIC, we will take all reasonable steps to contain the suspected or known breach where possible and follow the following process set out in this clause.

We will take immediate steps to limit any further access or distribution where possible. If we have reasonable grounds to suspect that the data breach is likely to result in serious harm to any individuals involved, then we will take all reasonable steps to ensure an assessment is completed within 30 days of the breach or sooner if possible. We will follow the guide published by the Office of the Australian Information Commissioner (if any) in making this assessment.

If we reasonably determine that the data breach is not likely to result in serious harm to any individuals involved or any remedial action we take is successful in making serious harm no longer likely, then no notification or statement will be made.

Where, following an assessment and undertaking remedial action (if any), we still have reasonable grounds to believe serious harm is likely, as soon as practicable, we will provide a statement to each of the individuals whose data was breached or who are at risk. The statement will contain details of the breach and recommendations of the steps each individual should take. We will also provide a copy of the statement to the Office of the Australian Information Commissioner.

We will then review the incident and take action to prevent future breaches.

DIRECT MARKETING MATERIALS

We may send you direct marketing communications and information about rental services that we consider may be of interest to you. These communications may be sent in various forms, including mail, SMS, fax and email, in accordance with applicable marketing laws, such as the *Spam Act 2003* (Cth). 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 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.

COMPLAINTS

If you believe that your privacy has been breached, please contact us using the contact information below and provide details of the incident so that we can investigate it. We will deal with the complaint in accordance with our then current complaints handling procedure.

LINKS

The Website may also include links to third party websites (including links created by users or members) and applications and advertising delivered to the Website by third parties ("Linked Sites"). Organisations who operate Linked Sites may collect personal information including through the use of Cookies. We

are not responsible nor liable for Linked Sites and recommends that you read the privacy policies of such Linked Sites before disclosing your personal information. For the avoidance of doubt Linked Sites are not subject to this Privacy Policy.

CHANGES TO THIS PRIVACY POLICY

This Privacy Policy is subject to change at any time so we encourage you to review this Privacy Policy at regular intervals. If Azinna changes this Privacy Policy an updated version will be posted on Azinna's website to notify you of this change. By continuing to use Azzina's Services after that time you will be deemed to have accepted any changes to its Privacy Policy.

CONTACT US

If you have any questions about this privacy policy, any concerns or feedback regarding the treatment of your privacy, please use the contact link on our website or contact our Privacy Officer using the details set out below.

We will treat your requests or complaints confidentially. Our representative will contact you within 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 our Privacy Officer at:

Privacy Officer

Post: Level 3 468 St Kilda Road, Melbourne, VIC 3004 03 9804 5885

Email: sayhello@apdprojects.com.au

FURTHER INFORMATION

If we do not resolve your enquiry, concern or complaint to your satisfaction or you require further information in relation to any privacy matters, please contact the Office of the Australian Information Commission at:

Telephone: 1300 363 992

Email: enquiries@oaic.gov.au

Office Address: Level 3, 175 Pitt Street, Sydney NSW 2000

Postal Address: GPO Box 5218, Sydney NSW 2001

Website: www.oaic.gov.au