



PRIVACY POLICY

This Privacy Policy applies to 360 Property Group A.C.N. 136 652 901 of 61, Danks Street West, Port Melbourne, its related entities (within the meaning of the Corporations Act 2001) and associates (**We/Us/Our**).

In the process of operating Our business, We handle, collect, process, record, store and disclose personal information relating to developers, purchasers, potential purchasers, landlords, tenants and potential tenants of properties within the development, as well as employees, contractors, sub-contractors and consultants. We take seriously our obligations under the Privacy Act 1988 (Cth) (as amended) ("Privacy Act") and the National Privacy Principles. This Privacy Policy explains how We comply with those obligations.

COLLECTION AND TYPE OF INFORMATION COLLECTED

During the course of your involvement with 360 Property Group, We may collect, use or disclose personal information about you for the following purposes (**Collection Purposes**):

- Assisting you to purchase your property;
- Assisting you to lease a property (if required);
- Assisting you with payment or refund of a bond;
- Assisting you with property disputes;
- Coordinating repairs or maintenance of a property owned or leased by you;
- Recording or accessing information at the Titles Registry Office or other government agency, including the Residential Tenancies Authority;
- Recording or accessing information on for sale or letting or other property information services or databases;
- Marketing of products and services to you and to potential buyers.

We may collect and hold your personal information in hard copy or electronic form and the personal information We may collect, use or disclose about you includes but is not limited to:

- Your full name, DOB and address including postal address and email address;
- Your various telephone numbers including your mobile number if required;
- Your occupation and business address;
- Financial information including, but not limited to, bank account details and credit card details;
- Details of properties owned by you;
- Your Power of Attorney details and registration number.

If you do not provide this information to Us, We may not be able to provide all or any of Our services to You.

We will try to collect your personal information directly from you, however sometimes it will be necessary for Us to collect information from a third party or a publicly available source. If We do collect your personal information other than directly from you, it will only be because it is reasonably necessary for or directly related to one of the Collection Purposes, and in any event We will notify you as soon as practicable after We do so.

USE AND DISCLOSURE OF PERSONAL INFORMATION

Generally, We use or disclose the personal information We collect only for the Collection Purposes and for any purpose ancillary or consequential to the Collection Purposes such as obtaining finance or professional advice and accurate file management. To this end We may use the services of agents, service providers or contractors.

We may also use the personal information We hold for the purposes of research and future product development. We may send marketing material to Our customers, either by post or electronically, unless a person has advised Us in writing that they do not wish to receive such information.

In order to provide products and services to you, We may disclose your personal information to the following people (**Usual Disclosees**):

- In the event that you are a seller or a lessor, We may disclose your personal information to prospective buyers of the property owned or leased by you;
- Your legal advisor(s) and the legal advisor(s) representing the other party(s) involved in your transaction;
- Your financial institution and/or financial advisor;
- Insurance providers and brokers;
- Utility providers and utility connection service providers;
- Persons or organisations involved in providing, managing or administering your properties, products or services including independent contractors engaged by us as real estate agents;
- Tradespeople engaged by Us to repair or maintain a property owned or leased by you;
- Organisations involved in maintaining, reviewing and developing Our business and computer systems;
- Persons or organisations involved in purchasing part or all of Our business;
- Our related entities;
- The Titles Registry Office or other government agencies;
- The Residential Tenancies Authority;
- Real estate websites and other property databases;
- Other real estate agents.

We may also provide the personal information to any third party:

- if required by law;
- who is a purchaser, potential purchaser, tenant or prospective tenant of all or part of the Development in respect of which We collected your personal information (**Development**);
- who is a purchaser or potential purchaser of Our business; or
- who is Our agent or consultant for the purposes of marketing the Development to potential purchasers and potential tenants.

In the course of providing services to you, it may be necessary for Us to enter your personal information into electronic software programs and other online or internet real estate websites. Depending on the terms of use of such software and websites, a third party may acquire rights to use or disclose information entered into the relevant forms or websites.

We may disclose your personal information to Usual Disclosees within Australia or overseas. Should your personal information be required to be sent overseas, We will take steps to protect the privacy of your information.

We will not sell personal information to other companies. If We wish to use or disclose the personal information in other circumstances, We will first obtain the consent of the person to whom it relates.

STORAGE OF INFORMATION

We endeavour to secure all personal information We hold, and to keep that information accurate and up-to-date. We require that all employees and consultants to whom We disclose personal information respect the confidentiality of that personal information at all times.

We will retain the personal information as long as necessary, subject to Our legal obligations to store certain information or unless otherwise stated in this policy. We will take all reasonable steps to comply with a person's request to delete or destroy their personal information We hold, unless We still need the information to fulfil Our functions, We are compelled by law to retain it, it is required to resolve certain disputes or for auditing purposes.

A person may request at any time that a copy of any personal information We hold about them is provided to them and may advise Us of any corrections necessary. A reasonable administration fee may apply for the cost of accessing this information.

WEBSITE

No data or transmission over the internet can be guaranteed to be secure. We cannot guarantee the protection of information that a person transmits when accessing this website.

We may measure and record information about the number of visitors and their use of the site for trends and statistics for marketing purposes or for the purpose of making the website more relevant and user-friendly.

This website may provide links to other websites and may be linked to from other websites. We are not responsible for the privacy practices of the operators of those websites and are not liable for their conduct. The terms and conditions of those websites should be checked carefully before any personal information is disclosed on any linked website.

ACCURACY OF PERSONAL INFORMATION

We take all reasonable steps to ensure that the information We collect is accurate, complete and up to date at the time of collection. A person should contact Us if their circumstances change or they have reason to believe Our records of that person's personal information are not accurate, complete or up to date. We will take all reasonable steps to amend the information in accordance with the above criteria.

ACCESS TO PERSONAL INFORMATION

Upon a person's request, We will provide that person with access to personal information We hold about the person if it is reasonably practicable to do so, within a reasonable period after a request is made. However, We retain the right to deny a person access to their personal information to the extent that:

- (a) We reasonably believe that giving access would pose a serious threat to the life, health or safety of any individual, or to public health or public safety; or
- (b) giving access would have an unreasonable impact on the privacy of other individuals; or
- (c) the request for access is frivolous or vexatious; or
- (d) the information relates to existing or anticipated legal proceedings between Us and the person, and would not be accessible by the process of discovery in those proceedings; or
- (e) giving access would reveal Our intentions in relation to negotiations with the person in such a way as to prejudice those negotiations; or
- (f) giving access would be unlawful; or
- (g) denying access is required or authorised by or under an Australian law or a court/ tribunal order; or
- (h) both of the following apply:
 - (i) We have reason to suspect that unlawful activity, or misconduct of a serious nature, that relates to Our functions or activities has been, is being or may be engaged in; and
 - (ii) giving access would be likely to prejudice the taking of appropriate action in relation to the matter; or
- (i) giving access would be likely to prejudice one or more enforcement related activities conducted by, or on behalf of, an enforcement body; or
- (j) giving access would reveal evaluative information We have generated in connection with a commercially sensitive decision-making process.

SECURITY OF PERSONAL INFORMATION

We take all reasonable steps to protect the personal information We collect from:

- misuses, interference and loss; and
- unauthorised access, modification or disclosure.

If We hold personal information which We no longer need for any purpose for which We may disclose your personal information as described in this policy, and:

- the information is not contained in a Commonwealth record; and
- We are not required by or under an Australian law, or a court/tribunal order, to retain the information;

We will take all such steps as are reasonable in the circumstances to destroy the information or to ensure that the information is de-identified.

FURTHER INFORMATION

For further information regarding privacy issues, visit the Australian Federal Privacy Commissioner's website at <http://www.privacy.org.au>.

CONTACTING US

If you have any queries concerning any aspect of this policy or Our practices, or a concern or complaint please contact Our Privacy Officer: Mr John Meagher t: (03) 9644 2600 email: administrator@360propertygroup.com.au