

We, the RILOW Group (comprising of Elderton Homes Pty, Elderton Homes Pty Ltd, White Square Properties Pty Ltd and its related body corporates), is committed to protecting your privacy.

We provide this privacy policy under the *Privacy Act 1988* (Cth) to outline our practices in the collection, use, disclosure and handling of your personal information.

## **PRIVACY POLICY**

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### **1. Privacy Policy**

- 1.1 This Privacy Policy is governed by the Australian Privacy Principles under the *Privacy Act 1988* (Cth) and 'personal information' has the corresponding meaning under the Privacy Act.
- 1.2 Our Privacy Policy does not create any rights or obligations for either you or us in addition to those imposed by the *Privacy Act 1988* (Cth).

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### **2. Collection of Personal Information**

- 2.1 We collect your personal information directly from you unless it is unreasonable to do so or where you have consented that another person provide it. We collect your personal information when you:
  - (a) complete our client details form either in paper or online;
  - (b) interact with us by phone, in person or via email and you provide us your details;
  - (c) subscribe to our mailing list; or
  - (d) enter our competitions or promotions.
- 2.2 We collect personal information to:
  - (a) provide our product or service to you including our home design, real estate or any other services;
  - (b) improve our products and services;
  - (c) communicate with you and answer your queries;
  - (d) offer you promotional product or market our product that you are interested in;
  - (e) keep our customer database;
  - (f) comply with the law or to use your information as permitted under the law; and
  - (g) use your information for purposes that are related to the above.
- 2.3 We collect and hold the following types of personal information:
  - (a) your contact details that may include your name, business name, postal address, email address, fax number and phone number;
  - (b) land and house information including land location, lot number and your house requirements;

- (c) optional information about whether you are purchasing a first home or an investment property, and any other details that you consent to provide.

2.4 We will only collect your personal information using fair and lawful means.

2.5 If we receive unsolicited personal information, we may destroy it or ensure that it is de-identified if it is lawful and reasonable to do so.

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### **3. Security**

3.1 We will use a database management system to store your personal information and it will contain appropriate security features to ensure the protection and integrity of your personal information.

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### **4. Anonymity and Pseudonymity**

4.1 You may interact anonymously or by using a pseudonym, for example when you call us or email us to inquire about our services, and you may refuse to give your details.

4.2 You must provide your personal information when you engage with us for us to provide our goods or services to you. We are unable to provide our goods or services unless you provide us with appropriate personal information and other necessary information.

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### **5. Disclosure of Personal Information**

5.1 We only disclose your personal information for purposes that are reasonably related to our business.

5.2 We will not disclose your personal information to third parties for payment, profit or advantage.

5.3 We may disclose your personal information to third parties, from time to time, to assist us in conducting our business, including:

- (a) contractors, builders or other third parties to provide you with the goods or services requested or those that are associated with such;
- (b) technology service providers including internet service providers or cloud service providers;
- (c) couriers such as Australia Post;
- (d) data processors that analyse our website traffic or usage for us;
- (e) agents that perform functions on our behalf, such as mailouts, debt collection, marketing or advertising;
- (f) our related bodies corporate; and
- (g) to persons, entities or courts as required under the law.

5.4 We may disclose your personal information to third parties:

- (a) to provide the good or service you requested;
- (b) to improve our business, services and products;

- (c) to customise and promote our services which may be of interest to you;
- (d) to comply with or as permitted under the law; or
- (e) otherwise with your consent.

5.5 We may disclose your personal information to entities based in overseas for the purposes set out in this privacy policy and we will take reasonable steps to ensure that they do not breach the privacy obligations to your personal information.

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## **6. Direct Marketing to You**

6.1 We may use the non-sensitive information you gave us for the purpose of promoting and marketing our business to you if we:

- (a) use the information that you reasonably expected us to use for promoting and marketing our business to you; and
  - (b) provide you a simple method to opt-out.
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## **7. Accessing and Correcting Your Personal Information**

### **Accessing Your Personal Information**

7.1 You may request access to your personal information that we hold and we will:

- (a) verify your identity;
- (b) charge you to cover the cost of meeting your request, if any, but not for the request itself; and
- (c) within a reasonable period of time, comply with your request.

7.2 We may refuse to allow you to access your personal information if we are not required to do so under the Australian Privacy Principles.

### **Correcting Your Information**

7.3 You may request to correct your personal information that we hold and we will update your personal information so that it is up-to-date, accurate, complete and relevant.

### **How to Contact Us**

7.4 If you would like to access or correct your personal information, please contact us by:

- (a) email to: [sales@eldertonhomes.com.au](mailto:sales@eldertonhomes.com.au);
  - (b) writing to: PO Box 7390 Baulkham Hills BC NSW 2153; or
  - (c) phone: 02 8883 4012.
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## **8. Complaints**

- 8.1 If you wish to complain about our privacy policy or our privacy practices, you may lodge a complaint with us in writing to our address with detailed information about your complaint. Please allow us a reasonable time (about 30 days) to investigate and reply to your complaint.

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**9. Changes to the Privacy Policy**

- 9.1 We may change and update our privacy policy from time to time. We will inform you of the updates on our website.