

# **Privacy Policy**

## Introduction

Haddin Group Pty Ltd (ACN 628 061 825) as trustee for the Haddin Group Trust, which trades as Haddin Group, itself and through related entities such as 96A – 98 Plymouth Rd Pty Ltd (ACN 623 309 991) as trustee for 96A – 98 Plymouth Road Unit Trust, hereafter referred to as "we", operates a property development business.

Specifically, 96A – 98 Plymouth Rd Pty Ltd (ACN 623 309 991) as trustee for 96A – 98 Plymouth Road Unit Trust, is undertaking a property development known as Parc on Plymouth in the eastern suburbs of Melbourne.

We respect your privacy. Across our business, we often collect personal information about people that we do business with. This Privacy Policy relates to the way that we collect, use and protect information that can identify you as an individual ("personal information").

It is our intention that this Privacy Policy should protect your personal information from being dealt with in a way that is inconsistent with privacy law in Australia.

## Collection

We try to only collect your personal information from you with your consent. When you register for one of our websites, such as and including parconplymouth.com.au, part of the registration agreement is that you consent to us collecting personal information about you.

## What we collect

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

- register your interest on our website parconplymouth.com.au, we will collect your name, phone number, email and postcode;
- participate in questionnaires or surveys conducted by us or on or behalf, we will collect the details of your responses to the questions that you answer;
- enquire further, we may collect your name, contact details, age, details of your enquiry, details of the property or properties you are interested in (including price ranges), what prompted you to inspect the relevant property development(s), whether you are an owner occupier or investor and how you heard about us or the relevant property development(s);
- are a purchaser or prospective purchaser, we may collect (in addition to the above) the terms of your contract (including price), payment details, information relating to your financing arrangements (including the amount you are borrowing) and contact details for your authorised representatives (such as your lawyer).



## Use and disclosure

We use your information to provide you with the goods and services that you request from us. In particular, your information may be used and disclosed as follows:

## Information and updates about the property development(s)

We will use your information to provide you with updates about the property development(s) you have expressed interest in, such as Parc on Plymouth – for example, key dates, when lots are released, sales progress etc. – and to provide you with an opportunity to enquire further. If you no longer wish to receive these updates, you can ask that you name be removed from the list of people who receive these updates.

## Newsletters, offers, surveys

We may also use your information to make you aware of other goods or services that may be of interest to you, and to send you newsletters and surveys. This may include information about future property developments undertaken by us (including any related entity). If you do not wish to receive this information, you can ask that your name be removed from our marketing mailing list. If any other use is to be made of your personal information, we will tell you at the time of collecting the information.

## Third party service providers

We sometimes hire third party businesses to provide services on our behalf, including marketing, packaging, mailing and delivering items, sending postal mail, providing technical support, and processing registrations. We provide those businesses only the information they need to deliver the service, and they are prohibited from using that information for any other purpose.

#### Sale of our business

We may also use and disclose your personal information in the good faith belief that such action is necessary in connection with a sale, merger, transfer, exchange or other disposition (whether of assets, stock or otherwise) of all or a portion of our business.

#### We do not sell your information to others

We will not sell your personal information to marketing companies or unrelated companies without your consent.

#### Other permitted disclosure

The *Privacy Act 1988* (Cth) also contains a number of statutory circumstances in which we may collect, use and disclose your personal information.



# Data quality

We take steps to ensure that the personal information we collect is accurate, up-to-date and complete. These steps include maintaining and updating personal information when we are advised by individuals that their personal information has changed, and at other times as necessary.

You can play an important part in helping us to maintain data quality, by only advising us of correct personal information.

## **Data Security**

We take your privacy and data security seriously. We will take reasonable steps to ensure that your personal information is protected against unauthorised access.

However, it is hard to guarantee total security on the Internet. You should be aware that other companies that we deal with and other websites that you can link to from our websites may not have the same security measures that we have. They operate under their own privacy and security policies and procedures, and we are unable to make any guarantees of the security of your personal information if you make it available to them.

Our employees and service providers are obliged to respect the confidentiality of any personal information held by us.

## Cross border disclosure of personal information

We note that we, and some of our service providers, may from time to time back up information in the Cloud, which could be located overseas.

We otherwise 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.

## Access

You have the ability to contact us to access and / or correct your personal information as necessary from time to time.

We will correct your personal information when we become aware of an error or inaccuracy in our database.

Much of the personal information that we will collect about you will be automatically harvested as you interact with our website(s). Because of the manner in which such information is recorded and stored, you may not be able to access such information.



Please note that we will require appropriate photographic identification before discussing and / or providing you with access to disclosed personal information.

## **Cookies and Online Behavioral Advertising**

Cookies are data that a website transfers to an individual's hard drive for record-keeping purposes. Cookies, which are industry standard and are used by most websites, including those operated by us, can facilitate a user's ongoing access to and use of a website. They allow us to customise our website(s) and communications to your needs.

If you do not want information collected through the use of Cookies, there is often a simple procedure in most browsers that allows you to deny or accept the Cookie feature. But you should note that Cookies may be necessary to provide you with some features of our online services. Our website(s) might not work for you if you block Cookies.

We (and / or our contractors) use advertising programs that place cookies on your computer to collect information about your browsing history (including on external websites). This information, which does not identify you personally, is collected in order to improve your online experience by customising the advertising you see to your interests (including the display of more relevant ads on external websites).

## Links to other websites

Our website might provide you with links to other websites. These linked websites are not under our control and we cannot accept responsibility for the conduct of companies linked to our websites. Before disclosing your personal information on any other website, we advise you to examine the terms and conditions of that website and its privacy statement.

## Amendment

We may amend, modify or remove portions of this Privacy Policy from time to time. You will be able to find our current Privacy Policy on our website(s).

## Interaction with other terms

This Privacy Policy is in addition to any other terms and conditions applicable to our website(s).

## Problems or questions?

If we become aware of any ongoing concerns or problems with our websites, we will take these issues seriously and work to address these concerns. If you have any further queries relating to our privacy policy, or you have a problem or complaint, please contact us.

Haddin Group May 2019