

## **Privacy Policy**

Aegis Property Group Pty Ltd ACN 627 171 357 (Aegis, **us, we, our**) takes your privacy seriously and is committed to responsible privacy practices.

We seek to comply with our obligations under the *Privacy Act 1988 (Cth)* (**Privacy Act**). This Privacy Policy describes how we collect, use, disclose, store, and handle your personal information.

### **What is personal information?**

In this Privacy Policy, 'personal information' has the meaning set out in the Privacy Act. In general terms, personal information is information (whether fact or opinion) about an individual who is identified or reasonably identifiable.

Some types of personal information are designated as 'sensitive information', which are subject to additional protection under the Privacy Act. For example, these can include information about your health.

### **What types of personal information do we collect?**

The types of personal information we collect about you will depend on the purpose for which the personal information is collected. This can include:

- if you have requested to receive newsletters containing market updates and/ or related material or events – your name, mailing or street address, email address, and telephone number(s);
- if you have contacted our team to make a complaint, provide feedback, submit an enquiry or request a call-back – your name, mailing or street address, email address, and telephone number(s);
- in the case of prospective employees or contractors – information contained in your application or résumé, recorded during any interview, or obtained through any pre-employment checks, and government-issued identifiers such as tax file numbers; and
- in the case of our clients and prospective clients – your name, organisation name, mailing or street address, email address, telephone number(s) tenancy information, number of employees and any other related lease or property information.

Generally, we will not collect sensitive information about you. However, in certain circumstances, we may need to collect limited sensitive information. For example, if you disclose details of disabilities, medical condition, or other specific dietary or allergy requirements to us.

We also collect technical information and general analytics, such as web browser type and browsing preferences, Internet service provider, referring/exit pages, and date/time stamps, IP address, time zone, and geolocation data (if applicable) arising from your use of our website.

### **How do we collect personal information?**

We collect your personal information directly from you, including when you:

- access or use our websites;
- sign up to receive newsletters and market updates or related material or events;
- enter surveys, or request information or material from us;

- make inquiries about us or our services or otherwise communicate with us by email, by telephone, in person, via a websites or otherwise; and
- apply to work with us or are engaged by us as a contractor.

Where it is reasonable and practicable to do so, we will only collect personal information about you from you directly and not from third parties. In limited circumstances, we may collect personal information about you from publicly available sources (such as the Internet) and from third parties (such as mutual contacts, or if someone makes a purchase on your behalf, or your referees provided during the recruitment process if you apply for a job with us). We may also collect personal information through third parties such as our service providers, through promotional and marketing activities, and from publicly available sources of information.

We also use the following technologies to collect technical information and general analytics:

- cookies, which are data files that are placed on your device and often include an anonymous unique identifier;
- log files, which track actions occurring on our websites; and
- web beacons, tags, and pixels, which are electronic files used to record information about how you browse our websites.

By using our websites, you are consenting to the use of these technologies in accordance with this Privacy Policy.

### **Can you choose not to disclose your personal information?**

If you contact us to make a general enquiry about us or our business, you do not have to identify yourself or provide any personal information. Alternatively, you can also notify us that you wish to deal with us using a pseudonym.

However, if we are not able to collect personal information about you, we may not be able to provide you with the information or assistance you require. For example, we will not be able to send you information you have requested if you have not provided us with a valid email address or telephone number.

### **How do we use your personal information?**

In general, we use your personal information for purposes connected with our business.

Some of the specific purposes for which we use your personal information are as follows:

- to provide our services to our clients or to receive goods or services from third parties;
- to enable the proper operation and functionality of our services;
- to verify your identity (for example, if you request access to the personal information we hold about you);
- to consider you for a job at Aegis (whether as an employee or contractor) or other relationships with us;
- to communicate with you and to address any issues or complaints that we or you may have regarding our relationship;
- for direct marketing purposes (see the "Direct marketing" section below); and

- to contact you regarding the above, including via electronic messaging such as SMS and email, by mail, by phone or in any other lawful manner.

We may also use or disclose your personal information for our administrative, marketing (including direct marketing), planning, product or service development, quality control, survey and research purposes and for other purposes to which you have consented, or as otherwise permitted or required by law.

Technical information and general analytics is used for the purpose of gauging visitor traffic, trends and delivering personalised content to you while you are on our websites, and to improve our websites and our services.

### **To whom do we disclose personal information?**

We may disclose your personal information to third parties in connection with the purposes described above (see the "How do we use your personal information?" section).

This may include disclosing your personal information to the following types of third parties:

- our related companies;
- any potential third party acquirer of our business or assets, and advisors to that third party;
- our professional advisers (such as lawyers, accountants or auditors) and insurers;
- our employees, contractors and third party service providers who assist us in performing our functions and activities e.g. payment systems operators and financial institutions, cloud service providers, data storage providers, shipping companies, telecommunications providers and IT support services providers;
- organisations authorised by us to conduct promotional, research or marketing activities;
- third parties to whom you have authorised us to disclose your information (e.g. referees); and
- any other person as required or permitted by law.

For clarity, we use third party service providers to provide us with web analytics services, such as Google Analytics. You can read more about how Google Analytics uses your personal information [here](#).

If we disclose your personal information to third parties we will use reasonable commercial efforts to ensure that such third parties only use your personal information as reasonably required for the purpose of disclosure and in a manner consistent with applicable laws, for example (where commercially practical) by including suitable privacy and confidentiality clauses in our agreement with a third party service provider to which we disclose your personal information.

### **Direct marketing communications**

We will only send you direct marketing communications (either through mail, SMS or email), including offers any news and market updates or similar material, or events, where you have consented to do so.

You may opt-out of receiving direct marketing communications at any time by contacting us or by using opt-out facilities provided in the direct marketing communications.

### **Does personal information leave Australia?**

We store personal information in servers located in Australia. We may disclose your personal information to overseas recipients, such as to our subsidiaries, subscribers and resellers, in order to provide its products and services and to obtain services.

Except where an exception applies under the Privacy Act or other relevant legislation, we will take commercially reasonable steps to ensure that overseas recipients to whom we disclose personal information do not breach the Australian Privacy Principles stated in the Privacy Act in relation to such information.

### **How do we protect your personal information?**

We will take reasonable precautions to protect your personal information from misuse, loss, or unauthorised access, modification or disclosure. However, as the Internet is inherently insecure, we cannot guarantee the security of transmission of personal information you disclose to us online. Accordingly, you transmit your personal information to us online at your own risk.

Please notify us immediately if you become aware of any breach of security.

### **How long do we keep your personal information?**

Generally, we will retain your personal information for the period necessary for the purposes for which your personal information was collected (as outlined in this Privacy Policy) unless a longer retention period is required by law or if it is reasonably necessary for us to comply with our legal obligations, resolve a dispute or maintain security.

When personal information is no longer required, we will take reasonable steps to delete the personal information from our systems or de-identify the personal information.

### **How can you access and correct your personal information?**

You may request access to any personal information we hold about you at any time by contacting us. We will provide access to that information in accordance with the Privacy Act, subject to any exemptions that may apply. We may charge an administration fee in limited circumstances, for example if we are required to.

If you believe that personal information we hold about you is incorrect, incomplete or inaccurate, then you may request us to amend it by contacting us.

### **What is the process for complaining about a breach of privacy?**

If you have any questions, concerns or complaints about our collection, use, disclosure or management of your personal information, please contact us in writing using the contact details below.

We will make inquiries and your complaint will be assessed by an appropriate person with the aim of resolving any issue in a timely and efficient manner.

If you are unsatisfied with the outcome, we will advise you about further options including, if appropriate, review by the Privacy Commissioner within the Office of the Australian Information Commissioner.

### **Local exemptions and inconsistency with law**

Where local laws allow for an exemption to compliance with certain legal obligations (for example, the employee records exemption in Australia), we may rely on such an exemption.

This Privacy Policy will not apply to the extent that it is inconsistent with any applicable law.

### **Changes to this Privacy Policy**

We may change this Privacy Policy from time to time at our discretion. Amendments to this Privacy Policy will be posted on our website. Your continued dealings with us, for example use of our website or services, will signify your agreement to this Privacy Policy as amended.

### **How to contact us**

If you have a query, concern or complaint about the manner in which your personal information has been collected or handled by us or would like to request access to or correction of the personal information we hold about you, please contact using the details provided below:

Aegis Property Group Pty Ltd  
Attention: Privacy Officer  
527 Gregory Terrace  
Fortitude Valley QLD 4006  
info@aegispg.com.au

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