

Privacy Policy

1. Your rights in relation to privacy

We understand the importance of protecting the privacy of an individual's personal information. This policy statement sets out how Dennis Family Corporation Pty Ltd ABN 15 089 081 667 and its related entities set out below (we/our/us/Group) aim to protect the privacy of your personal information, your rights in relation to your personal information managed by us and the way we collect, hold, use and disclose your personal information.

For the purposes of this policy, reference to the Group includes the following entities:

- (a) Dennis Family Corporation Pty Ltd;
- (b) Dennis Personnel Pty Ltd;
- (c) Dennis Family Homes Pty Limited;
- (d) Ranfurlie Asset Management Pty Limited; and
- (e) any other related bodies corporate (as defined under the *Corporations Act 2001*) of the above entities.

In handling your personal information (including credit-related personal information), we are committed to preserving your privacy in accordance with the *Privacy Act 1988* (Cth) (**Privacy Act**) and its 13 Australian Privacy Principles. This policy may be updated from time to time.

To the extent that we handle your credit-related personal information, we will also comply with the Credit Reporting Code.

This policy statement addresses the following:

- 1. What kinds of personal information do we collect?
- 2. How do we collect your personal information?
- 3. Why do we need your personal information?
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1.1 What kinds of personal information do we collect?

Personal information is information or an opinion about an identified, or reasonably identifiable, individual. During the provision of our products and services, we may collect your personal information.

Generally, the kinds of personal information we collect include:

- your contact and identification information such as your name, previous names and change of name documentation, address, previous addresses, telephone number, email address and date of birth;
- banking, financial, loan and trading information including information about your assets, tax assessments, rental contracts, occupation, employers and previous employers, income, account balances and activities, and transactions with us or third parties;
- property and title information including information about land values;
- credit information, being credit-related personal information lawfully created and accessible within the Australian credit reporting system including:
 - o identification information including viewing, or obtaining copies of, your driver's licence, Medicare card, passport, birth certificate or extract, citizenship certificate or evidence of permanent residence, marriage certificate or other evidence of your relationship status and ATM cards;
 - o consumer credit liability information including:
 - information about existing and previous credit providers and credit accounts;
 - the types of consumer credit provided;
 - the day on which the accounts were entered into, terminated or otherwise ceased to be in force;
 - the terms and conditions of the consumer credit relating to the repayment of the credit or otherwise prescribed by law; and
 - the maximum amount of credit available under the consumer credit;

- o repayment history information, being information about whether you have met your monthly payment obligations with respect to consumer credit;
- o information about defaults;
- o information regarding whether another entity has sought credit-related personal information about you from a credit reporting body;
- o information about the types of credit, and the amounts of credit, you have sought from a credit provider;
- o information about court proceedings related to credit provided to you or for which you have applied;
- o personal insolvency information and other publicly available information relating to your credit worthiness;
- o a credit provider's reasonable belief that you have committed a serious credit infringement; and
- o any other information lawfully obtainable within the Australian credit reporting system;
- personal information for actual or prospective tenant of premises or kiosks licensee, or assignee)
 - o Retailers and licensees: names, addresses, dates of birth, contacts and insurance details, job descriptions, business details, trading history, financial capacity and private and business assets and liabilities. For retailer or licensee personnel / staff, it includes name, job position, contact details and any other information required for registering retailer personnel for centre services, such as retailer carparking, entry passes and keys, for which we collect number plate details.
 - o Guarantors: name, job position, contact details and all other information on your business experience, trading history, financial capacity, as well as personal and business assets and liabilities.
- your vehicle's license plate number when attending our retail locations
- credit eligibility information which is information about you, including the Information set out above, that we obtain from a credit reporting body together with information we derive from such information based on our own analysis. This may include an internally generated assessment, which reflects your suitability for a loan arrangement;
- insurance information;
- information including your photographic or video image collected via various methods, including by our CCTV surveillance systems;
- if you are a prospective employee, your employment history, academic results, personal interests and other information you may provide as part of the recruitment process;

- sensitive information including health information and criminal record information where you are applying for a position with us and it is relevant to the recruitment process through which you must progress or where you have consented to such collection;
- your opinion or preferences regarding our products or services;
- information concerning your online presence and the websites you access as provided to us through your use of our websites and your use of our Wi-Fi services;
- information concerning your location and movement as provided to us through your use of Bluetooth surveillance; and
- other personal information required for our functions and activities and to enable you to deal with us.

In some circumstances, we may also hold other personal information provided by you or a credit reporting body.

1.2 How do we collect your personal information?

Generally, we collect your personal information (including credit-related personal information) directly from you, through the completion of a manual or online form, an interaction or exchange in person or by way of telephone, facsimile, email, post or through the use of our website, including but not limited to when you:

- make enquiries about our products or services;
- ask to be placed on our mailing lists;
- complete a form;
- use any of our various websites;
- utilise our Wi-Fi services or by Bluetooth surveillance;
- meet with any of our staff;
- become a client, debtor, lessee or licensee; or
- apply for a job with us.

There may be occasions when we collect your personal information from other sources including but not limited to:

- an information services provider;
- a publicly maintained record or other publicly available sources of information including social media and similar websites;
- the Land Titles Office and other property registers;
- relevant State and Territory Valuers General;
- real estate agents;

- ASIC;
- Australian Federal Police;
- Department of health services;
- local road regulator;
- Medical/allied health providers;
- the Insolvency and Trustee Services of Australia;
- credit reporting bodies including Equifax Australia Pty Ltd (**Equifax**), Level 15, 100 Arthur Street, North Sydney NSW 2060, or other credit reporting bodies to assist us in determining whether we will provide a credit account to you or to an entity you represent or for which you are a director or guarantor;
- if for recruitment purposes, an external recruitment or background screening services provider; or
- third party providers which collate information which may otherwise be available through a generally available publication. In particular, we collect information from a third party provider, which collates information from real estate agents, property registers and relevant Valuers General, for the purpose of identifying comparable land values.

We may also collect personal information about you when conducting market research.

Generally, we only collect your personal information from sources other than you if it is unreasonable or impracticable to collect your personal information from you.

1.3 Why do we need your personal information?

We collect, hold, use and disclose your personal information where it is reasonably necessary for the purposes of:

- providing our products and services to you including:
 - o building and construction of residential homes;
 - o completing land and property sales;
 - o ascertaining comparable land values;
 - o leasing and property management
 - o operation of retail centres
- enabling our contractors to provide products and services to you including:
 - o building and construction of residential homes;
 - o completing land and property sales;
 - o ascertaining comparable land values;

- enabling our contractors' subcontractors to assist our contractors to provide products and services to you;
- enabling our contractors to engage in direct marketing with you;
- complying with our legal obligations:
 - o as a corporate credit representative of an Australian Credit Licence holder;
 - o under the Anti-Money Laundering and Counter Terrorism Finance Act 2006; and
 - o under the *National Consumer Credit Protection Act 2009* including the responsible lending guidelines; and
- carrying out our business functions including:
 - o recruitment processes for potential employment;
 - o personalizing and customizing your customer experience;
 - o engaging you as a contractor or consultant;
 - o tracking when you visit our offices, retail centres and display villages;
 - o tracking your customer sales experience;
 - o distributing promotional materials;
 - o market research;
 - o conducting customer profiling, device tracking and traffic management
 - o offer mobility equipment for hire within our shopping centres
 - o monitor car park usage and help you locate your vehicle
 - o accounting, billing and other internal administrative purposes;
 - o identifying and informing you of products and services that may be of interest to you;
 - o managing and enhancing our services, including managing security and safety requirements at all our sites;
 - o providing, as part of our business, data to third parties;
 - o protecting the security of our property, buildings, and assets, including building perimeters, entrances, exits, reception and corridors;
 - o verifying alarm and access control system conditions;
 - o investigating any complaints about or made by you, or if there is any reason to suspect that you are in breach of any of our terms and conditions or that you have engaged in any unlawful activity;
 - o to assist law enforcement agencies, for example, in connection with the detection, investigation or prosecution of an offence; and

- o any other legal requirements.
- If you lease, license, or apply to lease or license from us, to:
 - o Determine whether to grant a lease, license or other rights to use our facilities or services.
 - o Manage and operate our relationship, agreements, payment systems and processes and communications with you (this includes notices issued under leases and licenses).
 - o Manage and operate the centres and its facilities in which you lease or license space from us.
 - o Manage and monitor the performance of our centres.
 - o Observe all emergency procedures and contact you in the event of an emergency.
 - o Understand your interests, preferences and activities as a retailer or licensee at our centres.
 - o Conduct market research surveys and interviews how to improve the retailer experiences at our shopping centres, display homes and sales centers.

We may also use your personal information (including credit-related personal information) for purposes related to the above purposes and for which you would reasonably expect us to do so in the circumstances, or where you have consented or the use is otherwise in accordance with law.

Where personal information (including credit-related personal information) is used or disclosed, we take reasonable steps to ensure it is relevant to the purpose for which it is to be used or disclosed.

You are under no obligation to provide your personal information to us. However, without certain information from you, we may not be able to provide our products and services to you. This includes assessing any application you make for employment or engagement as a contractor with us.

1.4 To whom do we disclose your personal information?

We disclose your personal information (including credit-related personal information) for the purpose for which we collect it. That is, generally, we will only disclose your personal information for a purpose set out at paragraph 3 above.

This may include disclosing your personal information to third parties engaged by us to perform administrative or other services, lenders or other credit providers, mortgage insurers, our contractors including, without limitation, building contractors, related bodies corporate, stationery printing houses, mailing houses, professional advisors or people or entities considering acquiring an interest in our business or assets.

We also disclose to the credit reporting body, Equifax (the contact details of which are set out in paragraph 2), information about you having applied for credit. This enables us to collect from Equifax credit related personal information about you for the purposes of:

- assessing your suitability for a loan; and
- facilitating financial advice and suitable loan arrangements.

Our disclosures of your personal information (including credit-related personal information) to third parties are on a confidential basis or otherwise in accordance with law. We may also disclose your personal information (including credit-related personal information) with your consent or if disclosure is required or authorised by law.

Social Media Channels

social media channels on which we have a presence such as Facebook, Twitter and Instagram, generally in these cases we limit disclosure of your personal information to your first name and surname;

1.5 Overseas disclosures

We do not disclose personal information (including credit-related personal information) to overseas recipients. However, in the event we need to do so:

- we will only do so in order to provide our services and products and manage our business functions; and
- before disclosing any personal information (including credit-related personal information) to an overseas recipient, we will take reasonable steps to ensure the overseas recipient complies with the Australian Privacy Principles or is bound by a substantially similar privacy scheme, unless you consent to the overseas disclosure or it is otherwise required or permitted by law.

1.6 Direct marketing

We may use and disclose your personal information in order to inform you of our products, services, offers (including offers of employment or engagement) and promotions that may be of interest to you and the products, services, offers and promotions of our contractors and third party service providers (for example, building contractors).

In order to inform you of such products, services, offers and promotions, such communications may be sent to you by email, SMS or other form of electronic communication.

In the event you do not wish to receive such communications from us or our third party service providers, you can opt-out by contacting us via the contact details set out in paragraph 18 or through any opt-out mechanism contained in a marketing communication to you.

1.7 Security of your personal information

We take reasonable steps to ensure that the personal information (including credit-related personal information) we hold is protected from misuse, interference and loss and from unauthorised access, modification or disclosure. We hold personal information in both hard copy and electronic forms in secure databases on secure premises, accessible only by those who have a legitimate business purpose and reason for accessing it. The secure databases are operated either by us or by our external service providers and we have implemented a range of security measures, including strict confidentiality agreements, passwords, firewalls and

encryption to restrict access.

Credit eligibility information, such as information we receive from Equifax or other credit reporting bodies for the purpose of assessing credit worthiness, is stored through equally secure methods.

We will destroy or de-identify personal information in circumstances where it is no longer required, unless we are otherwise required or authorised by law to retain the personal information.

You should be aware that the Internet is not a secure environment. Although we will use reasonable endeavours to protect your personal information, we cannot guarantee the security of personal information that is being transferred via the Internet. If you use the Internet to send us personal information, including your email address, it is sent at your own risk. Once we have received your personal information, we will use strict processes and security measures to prevent unauthorized access.

If we engage external service providers to assist us to fulfil our functions and activities, we will also require them to implement appropriate measures to protect any personal information that is provided to them.

1.8 Third party links

In the event that our website contains links to websites that are operated by third parties, such links are provided as a convenience to you and should not in any way be interpreted as an endorsement of any company, content or product that may be linked. Any access to a third party website that is linked to our website is at your own risk and we have no control over and are not responsible for the accuracy, validity or ownership of any content of a linked site and the privacy practices of those linked websites.

1.9 Electronic contracts

We use electronic contracts (**e-contracts**) to facilitate transactions with you and to enable us to provide our products and services to you. This also includes any offer of employment or engagement with us. Under this policy, you consent to us using e-contracts in your dealings with us. We handle personal information (including credit-related personal information) collected by e-contracts in the same way we handle all other personal information as set out in this privacy policy.

1.10 Can you access and correct the personal information that we hold about you?

We take reasonable steps to ensure personal information (including credit-related personal information) we collect, hold, use and disclose is accurate, up-to-date, complete, relevant and not misleading.

Under the Privacy Act, you have a right to access and seek correction of your personal information that is collected and held by us.

If at any time you would like to access or seek correction of the personal information (including

credit-related personal information) that we hold about you, or you would like more information on our approach to privacy, please contact our Privacy Compliance Officer via the contact details set out in paragraph 18.

We will grant access to your personal information to the extent required or authorised by the Privacy Act or other law and take reasonable steps to correct personal information (including credit-related personal information) where necessary and appropriate.

Where necessary to resolve a request for correction of your credit-related personal information, we may also consult with other relevant entities, including but not limited to any relevant credit reporting body.

To obtain access to your personal information (including credit-related personal information):

- you will need to provide proof of identity. This is necessary to ensure that personal information is provided only to the correct individuals and that the privacy of others is protected;
- we request that you be reasonably specific about the information you require; and
- we may charge you a reasonable administration fee, which reflects the cost to us, for providing access in accordance with your request.

In the event we correct personal information that we have previously disclosed to another entity, you may request us to notify that other entity of the correction. In these circumstances, we will take reasonable steps to notify the other entity of the correction unless it would be impracticable or unlawful to do so.

We will endeavour to respond to your request to access or correct your personal information within 30 days from your request.

You may also seek to access and correct personal information we have obtained about you from Equifax by contacting them on the details set out in paragraph 2.

1.11 Right to refuse access or correction

We reserve our right to refuse your request to access or correct your personal information if we consider your request to be frivolous or vexatious or if we are otherwise legally entitled to do so.

If we refuse your request to access or correct your personal information, we will provide you with written reasons for the refusal and details of complaint mechanisms. We will nevertheless take reasonable steps to provide you with access in a manner that meets your and the needs of the Group.

If we refuse your request to correct your personal information that we hold and you provide us with a statement that the information is inaccurate, out-of-date, incomplete, irrelevant or misleading, we will take reasonable steps to associate the statement in such a way that will make the statement apparent to users of your personal information.

Google Analytics:

By accessing our websites, you consent to the collection and processing of your personal (non-

identifiable) information or data for the above purposes, including the association of such information or data with the visitation information Google Analytics collects from our websites.

1.12 Web site cookies

We make limited use of 'cookies' technology on our website. We use cookies which can record information about your visit to our website, to improve the functionality of our website and enable us to better understand your needs. The 'cookies' store a log file which is retained for technical and statistical purposes only.

We also make use of third party cookies, for example, those that are sent by advertisers on websites that you visit. Third party cookies are used on our website to enable remarketing and reporting of user demographics and user interests.

The information collected is not personal information and, to the extent any personal information is collected, it is de-identified prior to being analysed for technical and statistical purposes. Cookies are a feature of your Internet browser that you can disable at any time, but this may mean that you are not able to use the full functionality of our website.

1.13 Wi-Fi services

We offer Wi-Fi services to customers and prospective customers at certain sites, including our sales offices, buildings, shopping centres, and display home villages.

If you are in possession of a device that is enabled for Wi-Fi and you are within range of one of our networks, we will automatically collect your location information and other information about your device while you are within range of our Wi-Fi network, for example, the type of device you hold, MAC address, signal strength, information specific to the handset and operating system and its movement patterns. Such information is unlikely to personally identify you, unless you connect to our Wi-Fi network.

In addition to the information referred to above, if you connect to our Wi-Fi network, we may collect personal information from you, including your name, phone number, email address, and details of the websites you access while you are connected to our network. This is only in circumstances where you are inputting this information whilst using our Wi-Fi network. We may use your personal information in aggregate form to improve our services and make them more responsive to your needs.

If you prefer that the above information is not collected via our Wi-Fi services, simply opt out by turning off your phone's Wi-Fi when entering our buildings.

1.14 Bluetooth Surveillance

If you are within range of one of our networks and have Bluetooth capability on your smartphone switched on and are in possession of a device that is enabled for Wi-Fi, we will automatically collect your location information and other information about your device while you are within the range of our Wi-Fi network for example, the type of device you hold, MAC address, signal strength, information specific to the handset and operating system and its movement patterns. Through the use of this Bluetooth surveillance, we will also be provided with your mobile number.

One of the ways we will collect this information is through the use of Skyfii through Bluetooth capabilities available in our carparks, offices, buildings and retail centres for the purpose of tracking visitor flows, tracking customer sales experiences and marketing to customers. For further details, please refer to Skyfii's Privacy Policy:

<https://www.beonic.com/privacy-policy> and Terms and Conditions:

<https://www.beonic.com/terms-and-conditions>

For customers already on our database, we use the information gathered via Bluetooth surveillance for promotional marketing purposes. For those individuals not already on our database, we will not use the information gathered through Bluetooth surveillance for promotional marketing purposes.

One of the ways we will collect this information is through the use of Blix Traffic whereby we install Blix sensors in our carparks, sales offices, buildings, and display home villages for the purpose of tracking visitor flows, tracking customer sales experiences, and marketing to customers.

If you prefer that the above information is not collected via our Bluetooth surveillance, simply opt out by turning off your phone's Wi-Fi and Bluetooth capabilities when entering our display villages, buildings, and associated car parks.

1.15 CCTV surveillance

We use CCTV surveillance systems to record activity at our sites, including sales offices and car parks. We collect, hold, use and disclose your personal information, including your visual image, gathered via CCTV surveillance systems for one or more of our legitimate purposes related to our operations, including:

- ensuring the safety and security of staff and our premises and facilities;
- protecting the security of our property, buildings, and assets, including building perimeters, entrances, exits, reception, and corridors;
- verifying alarm and access control system conditions;
- training security staff under appropriate supervision; and

- to assist law enforcement agencies, for example, in connection with the detection, investigation, or prosecution of an offence.

1.16 Privacy complaints

Please direct all privacy complaints to our Privacy Compliance Officer.

At all times, privacy complaints:

- will be treated seriously;
- will be dealt with promptly;
- will be dealt with in a confidential manner; and

- will not affect your existing obligations to us or affect the commercial arrangements you have with us.

In the event you have a complaint with respect to privacy, the Privacy Compliance Officer will commence an investigation and inform you of the outcome of the investigation. If you are dissatisfied with the outcome of the investigation, you may refer the complaint to the Federal Office of the Australian Information Commissioner or, if you would like to participate in an external dispute resolution process, to Credit Ombudsman Services Ltd, Phone 1800 138 422 or PO Box A252, Sydney South NSW 1235.

Specifically, if your complaint relates to credit-related personal information and/or our failure to comply with our obligations regarding credit-related personal information under the Privacy Act and/or the Credit Reporting Code:

- we will acknowledge your complaint within 7 days of receipt, in writing, and endeavour to resolve it within 30 days, unless we inform you otherwise and seek your agreement in writing;
- we may consult with relevant third parties, such as a credit reporting body or other credit provider, in order to sufficiently and expeditiously resolve the complaint; and
- if your complaint relates to our refusal to provide access to, or correct, your credit related personal information, you may complain directly to the Office of the Australian Information Commissioner.

2. Further Information

Changes to this policy

If we decide to change this privacy policy, we will publish those changes on our website so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it.

How to contact us

For further information or enquiries regarding your personal information, please contact our Privacy Compliance Officer at:

Email: privacy@denniscorp.com.au

Address: The Privacy Officer, Dennis Family Corporation, 863 High Street, Armadale, Victoria 3143.

Ph: 03 9573 1208