

Privacy Policy

1. Policy

This Privacy Policy applies to the website at <http://www.everleysinbury.com.au> (the **Website**) which is operated by Sunbury Hills Pty Ltd ("Sunbury Hills"), the developer of the Everley Estate as well as for all the other business purposes including where personal information is collected in person, on forms, email, social media or by any other means. Sunbury Hills is bound by the Australia Privacy Principles ('**APPs**') in the *Privacy Act 1988* (Cth) and understands the importance of, and is committed to, protecting your personal information. This Privacy Policy explains how Sunbury Hills manages your personal information, including its obligations and your rights in respect of Sunbury Hills' dealings with your personal information.

Please take a moment to read Sunbury Hills' Privacy Policy as it describes what happens to your personal information (that is, information or an opinion about you, whether true or not, which identifies you or from which your identity is reasonably identifiable) that is collected on the Website and collected as part of other business operations that are undertaken by Sunbury Hills.

2. Collection of your personal information

- 2.1 Sunbury Hills will collect and hold your personal information in a fair and lawful manner, and not in an unreasonably intrusive way. Where it is reasonably practical to do so, Sunbury Hills will collect your personal information directly from you. However, in certain cases Sunbury Hills may collect personal information from third parties, including from publically available sources.
- 2.2 Sunbury Hills may collect the personal information you directly give to Sunbury Hills through some of the following means:
- (a) when you make an inquiry or order in relation products and services through the Website or during the course of other business operations including via collection in person, on forms, by e-mail, by social media or by other means;
 - (b) when you contact Sunbury Hills regarding the services you have requested;
 - (c) in administering the processing of a purchase from us;
 - (d) from other related correspondence (whether in writing or electronically);
 - (e) while conducting customer satisfaction and market research surveys;
 - (f) when administering any of Sunbury Hills' services; and
 - (g) as otherwise required to manage Sunbury Hills' business.

3. Types of personal information we collect

- 3.1 The type of personal information Sunbury Hills may collect can include (but is not limited to), your name, last name, email address, phone number, address and postcode.
- 3.2 Where you do not wish to provide Sunbury Hills with your personal information, Sunbury Hills may not be able to provide you with requested goods or services or property.

4. Purposes for handling your personal information

- 4.1 As a general rule, Sunbury Hills only processes personal information for purposes that would be considered relevant and reasonable in the circumstances. Sunbury Hills will only collect information that is necessary for the purposes as described in this Privacy Policy, or other purposes specifically communicated to you. Sunbury Hills uses fair and lawful methods to collect personal information.
- 4.2 Sunbury Hills collects, holds, uses and discloses personal information to:
- (a) provide you with Sunbury Hills' goods and services and real estate;
 - (b) manage and administer those goods and services and real estate;
 - (c) communicate with you regarding the acquisition of land or other goods and services;
 - (d) communicate with you regarding the land and services you have requested;
 - (e) comply with its legal and regulatory obligations; and
 - (f) otherwise to manage Sunbury Hills business.

5. Use and disclosure of your personal information

- 5.1 Some of the primary purposes for which Sunbury Hills uses and discloses personal information include:
- (a) maintaining customer records;
 - (b) delivery and supply of goods and services and sale of real estate;
 - (c) account keeping and invoicing;
 - (d) locating and/or retrieving Sunbury Hills' goods or other real estate; and
 - (e) administering Sunbury Hills' accounts with you.
- 5.2 Sunbury Hills may also use and disclose your personal information that it collects for a secondary purpose. A secondary purpose is one which is related to the primary purpose of collection. Some of the secondary purposes for which Sunbury Hills may collect your personal information include:
- (a) marketing Sunbury Hills' goods and services and real estate to you;
 - (b) goods and services development;
 - (c) customer and market research; and
 - (d) to keep you informed of any changes to Sunbury Hills' business, goods and services or other offerings that may be of interest to you.
- 5.3 Sunbury Hills generally does not disclose your personal information to third parties or organisations, unless they are contracted or employed to provide administrative, sales,

marketing, development management, project management or other services on Sunbury Hills' behalf and are bound by the APPs.

- 5.4 Sunbury Hills will not use or disclose your personal information for any other purpose unless you have consented to that use or disclosure, it is required to do so by law or where Sunbury Hills intends to bring legal action against you.

6. Protection of personal information

- 6.1 At Sunbury Hills, your personal information is treated with the greatest of care. Sunbury Hills maintains appropriate physical, procedural and technical security for its offices and information storage facilities so as to prevent any loss, misuse, unauthorized access, disclosure, or modification of personal information. This also applies to disposal of personal information.
- 6.2 Sunbury Hills further protects personal information by restricting access to personal information to those who need access to do their job. Physical, electronic and managerial procedures have been employed to safeguard the security and integrity of your personal information.

7. Direct marketing

- 7.1 Like most business, marketing is important to Sunbury Hills' continued success. Sunbury Hills has a unique range of products and services and real estate that it provides to customers at a high standard. Sunbury Hills would therefore like to stay in touch with customers and let them know about new opportunities. Sunbury Hills may provide you with information about new products, services and promotions.
- 7.2 Sunbury Hills will not disclose your personal information to third parties for marketing purposes except where third parties are contracted or employed to provide sales, marketing services or property management services on Sunbury Hill's behalf.
- 7.3 You may opt out at any time if you no longer wish to receive commercial messages from Sunbury Hills. You can make this request by contacting Sunbury Hills' Privacy Officer.

8. Cookies

- 8.1 A cookie is a small text file stored in your computer's memory or on your hard disk for a pre-defined period of time. Sunbury Hills uses cookies to identify specific machines in order to collect aggregate information on how visitors are experiencing this website. This information will help to better adapt this website to suit personal requirements. While cookies allow a computer to be identified, they do not permit any reference to a specific individual. For information on cookie settings of your internet browser, please refer to your browser's manual.

9. Accessing and correcting your personal information

- 9.1 You may contact Sunbury Hills' Privacy Officer to request access to the personal information that Sunbury Hills holds about you and/or to make corrections to that information, at any time. On the rare occasions when Sunbury Hills refuses access, you will be provided with a written notice stating the reasons for refusing access. Sunbury Hills may seek to recover from you reasonable costs incurred for providing you with access to any of the personal information about you held by Sunbury Hills.

- 9.2 Sunbury Hills is not obliged to correct any of your personal information if it does not agree that it requires correction and may refuse to do so. If Sunbury Hills refuses a correction request, you will be provided with a written notice stating the reasons for the refusal.

10. Overseas transfers of personal information

- 10.1 As the internet is a global environment, using the internet to collect and process personal information necessarily involves the transmission of that information worldwide.
- 10.2 Sunbury Hills may disclose your personal information to companies that are associated with Sunbury Hills overseas.

11. Resolving personal information concerns

- 11.1 If you have any questions, concerns or complaints about this Privacy Policy, or how Sunbury Hills handles your personal information, please email [Insert details] Sunbury Hills' Privacy Officer at or write to:

Sunbury Hills Pty Ltd, Level 7 468 St Kilda Rd, Melbourne, VIC 3004
(03) 9868 7500
privacy@everleysunbury.com.au

- 11.2 Once a complaint has been lodged, the Privacy Officer will respond to you as soon as possible.
- 11.3 You may also lodge a complaint with the Office of the Australian Information Commissioner by telephone: 1300 363 992 or email: enquiries@oaic.gov.au.

12. Changes

- 12.1 Sunbury Hills reserves the right to change the terms of this Privacy Policy from time to time, without notice to you. An up-to-date copy of the Privacy Policy is available on the Everley Sunbury Hills website at.

The last update to this document was 9 April 2020.