

PRIVACY POLICY

We are subject to the operation of the *Privacy Act 1988* (Cth) (**Privacy Act**). This policy explains how we handle personal information relating to individuals to ensure we meet our obligations under the Privacy Act.

Terminology

In this policy the expressions "we", "us" and "our" are a reference to Capital Alliance Normanby Development Pty Ltd (ACN 622 191 020).

The expressions "you" and "your" refer to each and every individual whose personal information we may handle from time to time. The expression "personal information" is as defined in the Privacy Act.

Consent

By registering your details with us or otherwise providing us with information about yourself, you will be deemed to have consented to us using your personal information in a manner consistent with this privacy policy, including monitoring your use of our website.

Types of information collected

We only collect personal information to the extent that this is reasonably necessary for one or more of our functions or activities.

Generally, we collect information such as your name, title, company, and contact details. However, we may also collect further personal information (including "sensitive information" as defined in the Privacy Act) as is reasonably required for the delivery of our services and information to you.

Method of Collection

Our preference is to collect personal information about an individual direct from that individual unless it is unreasonable or impracticable for us to do so.

Information will generally be collected from the following sources:

- (a) when you register your contact details with us on our website or otherwise request information from us;
- (b) from you if you attend any of our exhibitions or other events;
- (c) from you if you subscribe to any of our mail-outs; and

Purposes of collection

Purposes for which we may collect personal information include, but are not limited to:

- (a) conducting our business activities, including marketing and providing services to you;
- (b) providing information to you in relation to residential developments (which may include the purchase of an interest in property related investments) or any of our other business activities;

- (c) providing goods or services to you (or, if you are a tenant, to landlords that we act on behalf of);
- (d) improving our services or developing new services; and

Use and disclosure

We will not use or disclose personal information for the purposes other than those connected with the primary purpose of collection, or a reasonably related secondary purpose which we believe you should reasonably expect (or if the information is "sensitive information", a directly related purpose).

We may disclose your personal information for related purposes to a range of third parties in the course of our business and you expressly consent to us doing so. These third parties may include:

- (a) third party real estate agents who are engaged by us to conduct marketing campaigns;
- (b) our contracted third party service providers including:
 - (i) our external advisors (including lawyers and accountants);
 - (ii) marketing and communications agencies; and
 - (iii) any other third parties who we engage to perform services, functions or responsibilities on our behalf;
- (c) any person to whom we sell (or propose to sell) all or any part of our business or assets; and
- (d) government bodies or authorities, the police or the courts (as required or permitted by law).

You expressly consent to any such third parties using your personal information for any purpose consistent with our lawful use of your information or for any other purpose consistent with the normal functions of the recipient.

Secondary purposes might also include disclosure to maintenance personnel or other third party contractors (including outsourced and cloud service providers) who may be unable to avoid accessing personal information in the course of providing technical or other support services to our company.

Direct marketing

We will not use or disclose personal information for the purposes of direct marketing to you unless:

- (a) you have consented to receive direct marketing materials; or
- (b) you would reasonably expect us to use your personal details for this purpose; or
- (c) we believe you may be interested in the material but it is impractical for us to obtain your consent.

In every instance, we will ensure that our direct marketing material incorporates an option for you to elect to receive no further such communications.

Please note also that even if you have requested not to receive further direct marketing communications, we may nevertheless continue to provide you with information about changes to our terms and conditions for the supply of goods or services, questionnaires and other factual information. This form of communication is not regarded as "direct marketing" under the Privacy Act.

Storage of data and overseas disclosure

It is possible that we, or our subcontractors, will utilise cloud technology in connection with the storage of personal information, and it is possible that this may result in off-shore storage.

It is not practicable for us to specify in advance the location of every service provider with whom we may deal. By providing your personal information to us, you consent to our disclosure of your personal information to these parties. If you have any concerns regarding the transfer of your personal information overseas please contact us using the details provided below.

Employee records

Please note that, in accordance with the Privacy Act, this policy did not apply to our acts and practices directly related to a current or former employment relationship between us and an employee, and an employee record held by us relating to the employee.

Data security

We will take reasonable steps to protect the personal information which we hold from misuse or loss and from unauthorised access, modification or disclosure. We will destroy or de-identify personal information once we no longer require it for our business purposes.

When using our website you should be aware that no data transmission over the Internet can be guaranteed as totally secure. Although we strive to protect such information, we do not warrant the security of any information that you transmit to us over the Internet and you do so at your own risk.

Openness

From time to time, we may change our policy on how we handle personal information or the types of personal information which we hold. Any changes to our policy will be published on our website. You may obtain a copy of our current policy from our website or by contacting us on the details below. It is your responsibility to check the website from time to time in order to determine whether there have been any changes.

Access, correction and further information

We will take such steps as are reasonable to ensure that the personal information which we collect remains accurate, up to date and complete.

We will provide you with access to your personal information held by us unless we are permitted under the Privacy Act to refuse to provide you with such access. Please contact us via the details below if you:

- (a) wish to have access to the personal information which we hold about you;

- (b) consider that the personal information which we hold about you is not accurate, complete or up to date; or
- (c) require further information on our personal information handling practices.

Contact Details: Capital Alliance Investment Group, Level 11 720 Bourke Street Docklands VIC 3008, 03 9279 6600, info@capitalalliance.com.au

There is no charge for requesting access to your personal information but we may require you to meet our reasonable costs in actually providing you with access.

If you consider that the information which we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading, we will take reasonable steps, consistent with our obligations under the Privacy Act, to correct that information if you so request. We will respond to all requests for access and/or correction within a reasonable time.

Complaints

If you have a complaint about the way in which we have handled any privacy issue, including your request for access or correction of your personal information, you should advise us via the above contact details. If you remain unsatisfied with the way in which we have handled a privacy issue, we suggest you approach an independent advisor or contact the Office of the Australian Information Commissioner for guidance on alternative courses of action which may be available. We will provide our full cooperation in the event that you elect to pursue this course of action.