

# Privacy Policy

## **Pace Development Group Pty Ltd Privacy Policy**

**The Privacy Act 1988 (Cth) (Privacy Act) requires us to have a privacy policy and be bound by the Australian Privacy Principles (APPs) which set the standard for how we deal with your personal information.**

**This Privacy Policy is meant to help you understand what information we collect about you, why we collect it, and how you can update, manage, export, and delete your information. By providing personal information to us, you are taken to have read, and consent to the collection, use disclosure and handling of your personal information in accordance with this Privacy Policy.**

**For the purpose of this Privacy Policy, the Pace Development Group of associated companies is comprised of Pace Development Group Pty Ltd ACN 108 448 817 and any of its Related Bodies Corporate as that term is defined in the Corporations Act 2001 (Cth) (Pace Development Group, we us, our).**

**This Privacy Policy applies across the Pace Development Group business and applies in relation to its portfolio of properties (Property or Properties).**

### **What personal information we collect about you**

**Personal information has the meaning given to that term in the Privacy Act and includes information or an opinion (whether true or not) about an identified individual, or an individual who is reasonably identifiable.**

**We aim to collect personal information only if it is reasonably necessary to providing the product, service or information you have requested from us. The type of personal information that we collect about you depends on the type of dealings with us.**

**In general, you can assume that we may collect the following personal information about you:**

- **name;**
- **address;**
- **email address;**
- **telephone number and other contact details; and**
- **details about you to assist in managing our relationship with you, including details about interactions between you and Pace Development Group employees.**

### **Who we collect personal information about**

**During the course of our business, we ordinarily collect personal information about the following people:**

- **purchasers or prospective purchasers of a Property;**
- **subcontractors, suppliers or consultants to Pace Development Group;**
- **employees of finance companies, Local Council, conveyancers or solicitors and service suppliers which interact with us in the course of our business; and**
- **people who:**
  - o **send us an enquiry, complete and an enquiry form or provide us feedback;**
  - o **fill in a contact form at one of our display suites;**
  - o **participate in market research conducted by us or on our behalf;**
  - o **ask us to send them information about our products and services;**
  - o **apply for a job with us; and**
  - o **visit our website, [www.pacedg.com.au](http://www.pacedg.com.au) (Website).**

### **Purchasers or prospective purchasers of a Property**

**If you are a purchaser or prospective purchaser of a Property, we will collect the following personal information about you:**

- name, age and address;
- details of the Property that you are interested in or have agreed to purchase (such as the location and size of the Property and the design and specifications);
- what prompted you to be interested in the Property;
- how you heard about us;
- price points and apartment types you are interested in; and
- whether you are an owner-occupier or investor.

**In addition to the above, if you have purchased a Property, we may also collect:**

- a copy of your passport or driver's licence to verify your identity;
- information about whether you are an Australian resident;
- the terms of your contract;
- payment details;
- information relating to your financing arrangements such as your bank details and how much money you are borrowing; and
- contract details of your authorised representatives.

### **Subcontractors, Suppliers or Consultants**

**If you are a subcontractor, supplier or consultant to us, we will collect your name, age and address, details about the goods and services your supply and your payment details.**

### **Employee records**

**We are generally exempt from the Privacy Act when we collect and handle employee records and this Privacy Policy does not apply to that information. However, where State or Territory health privacy legislation applies, we are still required to protect the privacy of employee health information. This Privacy Policy will apply in those circumstances.**

**That being said, if you apply for a job with us, we will collect the information included in your job application, including your cover letter, resume, contact details and referee reports.**

**How we collect personal information from you**

**We may collect personal information in a variety of ways. Unless it is unreasonable or impracticable to do so, we collect your personal information from you directly, including:**

- in person;
- through our Website, either through our 'Enquiries' form or by using cookies;
- through our social media pages;
- over the telephone;
- through written correspondence;
- on hard copy forms such as enquiry forms and surveys;
- from third parties, including your lawyer, conveyancer, accountant or financial advisor, Local Council, real estate agents, Land Titles Office, the Australian Securities and Investment Commission.

**At the time of collection, or as soon as practicable after we have collected it, we will take such steps as are reasonable in the circumstances to notify you of the collection and of matters relevant to the collection, unless it is obvious from the circumstances that you would know or would expect us to have the information. We will generally include this information in a collection notice.**

### **How We Use Cookies**

**We may use cookies on some areas of our Website.**

**A cookie is a small file saved on your computer's hard drive. When you return to our Website, the data saved in the cookie is sent back to the Website.**

**You can learn more about cookies from [www.allaboutcookies.org](http://www.allaboutcookies.org).**

**Our Website uses the following types of cookies:**

- **Strictly necessary cookies, which allow you to move around our Website and use its features;**
- **Performance cookies, which provide information about how visitors use our Website so that we can gauge visitor traffic, trends and to help us serve you more efficiently if you revisit the Website. These cookies do not collect personal information;**
- **Functionality cookies, which allow our Website to remember choices you make and provide enhanced and more personal features; and**
- **Social media cookies, which are used when you share information using a social media sharing button or engage with our content on or through a social media site. This information may be linked to targeting / advertising activities.**

**The cookies we use in no way give us access to your computer or any information about you, other than the information you choose to share with us. You can choose to accept or decline cookies.**

**Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of our Website.**

**If you are concerned with the use of cookies, you can contact us to assist you to change the settings in your web browser to decline and/or delete cookies.**

**Why we collect personal information**

**We collect personal information primarily to:**

- **outline our Properties to prospective and existing purchasers;**
- **complete sales transactions and assisting purchasers with the management of their Property;**
- **promote ourselves and our products and services, including through direct marketing, events and completions;**
- **contact you for business purposes and manage our relationship with you or your organisation;**
- **provide you with the products, services and information that you request from us;**
- **obtain finance for our Properties;**
- **perform research and statistical analysis, including for customer satisfaction and service improvement purposes;**
- **answer queries and resolving complaints; and**
- **recruit staff and contractors.**

**We may also use or disclose your personal information to:**

- **comply with our legal obligations (including to comply with any law or any lawful request of a law enforcement agency or government authority);**
- **resolve any disputes that we may have with any of our clients and enforce our agreements with third parties such as your employer; or**
- **any other purpose for which you have provided your consent.**

**Please note that we may also use information collected through our Website for the purpose of gauging visitor traffic, trends and delivering personalised content to you while you are at our Website.**

**Marketing our products and services**

**Where we have your express or implied consent, or where we are otherwise permitted by law to do so, we may use or disclose your personal information to promote ourselves and our products and services to you.**

**Where possible, we will provide you with a choice to opt-out of any of the above and any of our direct marketing communications. We will respect your request to decline to receive these marketing communications.**

**Sharing of your personal information**

**Where appropriate, we may share your personal information with third parties.**

**For example, if you are a purchaser or prospective purchaser of a Property, we may disclose your personal information to:**

- **the Land Titles Office;**
- **relevant State Valuers;**
- **real estate agents;**
- **the Australian Securities and Investment Commission;**
- **financiers and prospective financiers;**
- **Local Council;**
- **your authorised agents or representatives;**
- **financial institutions for payment processing;**
- **mortgage brokers and financial planners;**
- **owners corporation managers and managing / letting agents;**
- **other contracted service providers, such as:**
  - o **our external business advisers;**
  - o **our subcontractors and suppliers of fixtures and fittings;**
  - o **delivery and shipping providers;**
  - o **information technology and data storage providers;**
  - o **venues and event organisers;**
  - o **marketing and communications agents; and**
  - o **research and statistical analysis providers.**

**We may disclose your personal information to these third parties so that they can assist us with providing the best possible service to you.**

**We will not otherwise disclose information about you unless the disclosure:**

- **is required or authorised by law; or**
- **you have consented to our disclosing the information about you.**

#### **Overseas disclosure**

**If you are an investor that is subject to FATCA, we may share your personal information with the United States Internal Revenue Services (IRS). When you provide us with your personal information you give us your consent to disclose your personal information outside of Australia for the purposes described above and acknowledge that we are not required to ensure that overseas recipients handle that personal information in compliance with the Privacy Act.**

**We are not otherwise likely to disclose information to overseas recipients unless it is with your consent, or the disclosure is required or authorised by law.**

**The privacy and collection practices of entities to which we disclose personal information are governed by their own privacy policies and collection notices.**

#### **Quality of your personal information**

**We aim to ensure that your personal information is accurate, complete and up to date. To assist us in this, you need to provide true, accurate, current and complete information about yourself as requested and properly update the information to us to keep it true, accurate, current and complete.**

**If you believe that the information we hold is inaccurate or incomplete, please contact us and we will use all reasonable efforts to correct the information.**

**If we do not believe the information to be incorrect, we will take reasonable steps to add a statement to the information claiming that you believe the information is inaccurate, incomplete or out of date.**

#### **Securing your personal information**

**We may hold your personal information in electronic or hard copy form. We will take reasonable precautions to protect your personal information from misuse, interference and**

loss, as well as from unauthorised access, modification or disclosure. We use a number of physical, administrative, personnel and technical measures to protect your personal information.

We take reasonable steps to destroy or permanently de-identify personal information if it is no longer needed for any purpose permitted by the APPs.

The steps we take to secure your stored personal information includes website protection measures such as firewalls and anti-virus software, security restrictions on access to our computer systems, controlled access to our corporate premises, personnel security including restricting access to personal information on our systems to stage who need that access only.

### **Website security**

We do our best to protect the personal information and privacy of users of our Website. However, we cannot guarantee the security of any personal information that you disclose and you disclose that information at your own risk.

You can contact us by telephone or post if you are concerned about disclosing personal information to us via our Website.

### **Accessing and correcting your personal information**

You have a right to request access to, or the correction of, your personal information that we hold about you, subject to exceptions allowed by law. You may be required to put your request in writing for security reasons.

We will give you access to, or correct, your personal information unless there is a lawful reason for refusing your request for access or correction. If we refuse your request we will give you a written notice explaining our reasons for that refusal and how you may complain about that refusal.

In most cases, we will endeavor to respond to access and correction requests within 30 days.

### **Change in control of Pace Development Group**

If we sell or otherwise transfer part or the whole of Pace Development Group or our business to another organisation (including in the course of a transaction like a sale, merger or acquisition or as part of a dissolution, liquidation, administration, receivership or other form of insolvency), you agree that your personal information that is collected by Pace Development Group may be disclosed to a third party, prospective buyer, transferee or insolvency practitioner and that this is reasonable to enable that party to continue or manage the business.

### **Complaints**

If you have a complaint about our collection, use or disclosure of your personal information, or you wish to make a complaint about a breach of the APPs, please contact our Privacy Officer at the details set out below.

In your complaint, please set out the details of your complaint and your contact details. Our Privacy Officer will contact you to acknowledge your request and ask for any other applicable information. Our Privacy Officer will then investigate the issue and advise you in writing of the outcome.

You can also make a complaint to the Office of the Australian Information Commissioner. Further information is available at [www.oaic.gov.au](http://www.oaic.gov.au).

### **Contacting us**

If you have any questions about this Privacy Policy or our privacy practices, would like to make a complaint or request access to or correction of your personal information, please contact us by any of the following means.

**Our contact details in respect of any issues in relation to privacy are:**

**Telephone 1300 722 334**

**Email mark@pacedg.com.au**

**Post Level 2, 201 Fitzroy Street, St Kilda Vic 3182**

**Changes to this Privacy Policy**

**Pace Development reserves the right to make amendments to this Privacy Policy at any time for any reason. We will publish any updated Privacy Policy on our Website.**