



Privacy Policy

Protecting peoples' privacy is very important to Cedar Woods Properties Limited (**Cedar Woods, we, us or our**). We are committed to maintaining the security of all personal information provided to Cedar Woods via our website or other channels. We are also committed to observing our obligations and requirements under the *Privacy Act 1988* (Cth) (**Privacy Act**) and the Australian Privacy Principles.

Purpose of the policy

This policy sets out how we collect, use, disclose and handle the personal information of our customers and others who interact with us. It also outlines how individuals can access and correct their information and make enquiries or complaints about any suspected privacy breach.

We may update this policy from time to time. At any time, the latest version of our privacy policy is available from our website at www.cedarwoods.com.au/privacy-policy.

What is personal information?

Personal information under the Privacy Act means information or an opinion about an identified individual (or an individual who is reasonably identifiable), whether the information is true or not, and whether the information is recorded in a material form or not.

Sensitive information is a special category of personal information, which can include (but is not limited to) race or ethnic origin, criminal history and health information. Sensitive information can only be collected with a person's consent, unless otherwise permitted by law.

What types of personal information do we collect?

We may collect and hold personal information about individuals who:

- purchase, or express an interest to purchase, a Cedar Woods product;
- lease, or express an interest to lease, premises in one of our commercial (incl retail) projects;
- register or subscribe to our newsletters or announcements;
- seek employment with us or are an employee;
- are directors of companies seeking, or involved in, a business or investment relationship with Cedar Woods;
- act as guarantors for an undertaking made by a third party to Cedar Woods;
- use our website; or
- are investors of Cedar Woods.

We only collect personal information that is necessary for us to carry on our business functions. What information we collect depends upon the nature of our dealings with those persons, and may include:

- information that identifies an individual (for example, name, address, email address, phone numbers, date of birth and photographic or video images);
- information needed to verify an individual's identity (for example, driver licence number);
- information about an individual's financial position and credit-worthiness;
- an individual's employment history, and other information an individual provides as part of the recruitment process;
- an individual's tax file number;
- an individual's opinion or preferences about our products, services or staff; or

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- information about an individual that is required or authorised by law.

Where possible, we collect personal information directly from the individual. In some circumstances, we may obtain personal information from a third party.

How do we collect personal information?

Cedar Woods collects personal information in a number of ways. The most common sources from which we may collect personal information are:

- directly from individuals when it is provided to us by: our website; social media channels; contact by email address, phone or through written correspondence (such as letters and faxes); hard copy forms (such as registration and application forms); contracts; or in person (for example, at a job interview);
- from publically available sources, including Cedar Woods' social media channels; or
- from third parties (for example, from referees if individuals apply for a position as an employee with us).

We do not generally collect sensitive information about individuals, unless required or authorised by law.

What if people do not wish to provide us personal information?

Where practical, we will give people the option of not identifying themselves, or using a pseudonym, when dealing with us.

For what purposes do we collect, hold and use personal information?

We collect, hold and use personal information for a number of purposes, which can include (but is not limited to):

- providing products or services that have been requested;
- communicating with an individual;
- providing ongoing information and marketing about products and services to individuals that we believe may be interested and where the individual has signed up;
- helping us manage and enhance our products and services, including analysing customer feedback and future customer needs;
- assessing the suitability of prospective tenants;
- recruiting employees and contractors;
- fulfilling our obligations to employees; or
- complying with regulatory and legal obligations.

Cedar Woods will only use personal information for the purposes for which it was collected. We will identify the purposes of collection and the parties or types of parties to whom we might disclose personal information at or before the time we collect personal information, or as soon as practicable after collection.

We may send to our customers information about other products and services which we expect may be of interest to them but respect their right to ask us not to do this. If subscribers no longer wish to receive those sorts of communications from us, they can contact our marketing personnel or send an email seeking removal from our email database as directed in the unsubscribe instructions or to email@cedarwoods.com.au, and we will ensure this is corrected.

Any other use or disclosure we make of personal information will only be as required or authorised by law.

How do we store and secure personal information?

Personal information is stored securely at Cedar Woods' offices in paper and /or electronic form and we may use third party data hosting service providers to store this information.

The security of personal information is important to us. We take all reasonable steps to protect it from misuse, loss, unauthorised access, modification or disclosure. This includes:

- requiring employees to maintain privacy and confidentiality of any personal information held;
- maintaining physical security measures over our physical premises;
- maintaining a range of computer and network security measures over our electronic systems (such as systems access, firewalls and data encryption);
- ensuring that the personal information we collect, use or disclose is accurate, complete and up to date; and
- safely archiving and ultimately destroy or permanently de-identifying personal information that is no longer needed for any purpose.

If third parties provide support services to Cedar Woods, we generally require them to agree to appropriately protect the privacy of the information provided to them. Providers of third party data hosting are contracted to ensure that they provide high levels of security to prevent unauthorised access to the information stored.

Is personal information disclosed overseas?

It is unlikely that Cedar Woods would provide personal information to an overseas recipient. If it does, it will only provide personal information to an overseas recipient in accordance with the requirements of the Privacy Act that relate to transborder data flows.

Links, cookies and use of our website

Cedar Woods' website contains links to other sites. This policy applies to all Cedar Woods websites and digital products but not to any linked sites. We encourage users to read the privacy policy of each website they access and assess whether the policy is satisfactory to before using the other websites.

Cedar Woods may use tracking technology such as "cookies" on the website and in the emails sent by us. The use of cookies is an industry standard and helps us monitor the effectiveness of our advertising and how visitors use the website. A "cookie" is a small data element stored by a web browser on a computer system. The website "cookies" do not store email address or other personal information. We use technology to generate statistics and measure site activity to improve the usefulness of visits to our website.

If users prefer not to receive cookies, they can adjust their internet browser to refuse cookies or to provide a warning when cookies are being used. However, our website may not function properly or optimally if cookies have been turned off.

How can people access or correct their personal information?

Generally, people have the right to know all the personal information we hold about them. They can request access to view and/or correct their personal information by contacting us, using the contact details set out at the end of this policy.

All requests for personal information will be responded to as soon as reasonably practicable after the request is made (usually within 30 days). Where possible, access will be given in the manner requested.

In some circumstances, we may refuse a person access to their personal information and, if this occurs, we will write to explain our reasons.

Some examples of when we might deny access to personal information are if:

- access will pose a threat to the life or health of someone;
- access would have an unreasonable impact on another person's privacy;
- information relates to anticipated or existing legal proceedings; or
- giving access would be unlawful.

For current or former employees, certain information is exempt from the Privacy Act if it is directly related to a person's current or former employment.

Persons not satisfied with the outcome of our assessment of a request or complaint may wish to contact the Office of the Australian Information Commissioner.

Persons wishing to change personal information that they believe may be inaccurate, out of date, incomplete, irrelevant or misleading, should contact us.

Contacting us with questions or complaints

For any concerns regarding Cedar Woods' use of personal information, to make a comment or query about privacy, or to seek access to correct or update personal information, please contact us as follows:

Cedar Woods Company Secretary

Telephone: (08) 9480 1500

Address: PO Box 788, West Perth WA 6872

Email: email@cedarwoods.com.au