

Privacy Policy

Cedar Woods Properties Limited is firmly committed to protecting your privacy. We are committed to handling your personal information in a transparent, secure and responsible way.

When we collect, hold, use or disclose personal information, we comply with the rules set out in the *Privacy Act 1988* (Cth) (**Privacy Act**). This policy explains what we do with your personal information, your privacy rights and how you can contact us regarding your privacy.

1. Personal Information

Personal information is defined under the Privacy Act and includes any information or opinion, regardless of its source, which identifies an individual, or from which an individual's identity can be ascertained, whether the information is:

- a. true or not; and
- b. recorded in material form or not

Personal information includes, but is not limited to:

- a. personal details such as name, address, telephone number or email address;
- b. bank account details; and
- c. employment details.

Sensitive information is a special category of personal information under the Privacy Act, and can include, but is not limited to, information about race, political or religious beliefs, sexual preferences, criminal convictions and health information.

2. Collection of Personal Information

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 commercial premises
- register or subscribe for newsletters or announcements
- seek employment with us or are an employee
- supply goods and services to us
- use our websites
- are investors in our company

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

- information that identifies the individual (for example, name, gender, address, contact details, date of birth, photographic, voice recordings or video images);
- information reasonably required to verify your identity or business information required by applicable laws;
- information about the individual's financial position and credit-worthiness;
- an individual's employment history, and other information an individual provides as part of the recruitment process;
- information including an individual's image collected via our CCTV systems;

- information about the individual that is required or authorised by law;
- the individual's tax file number;
- the individual's opinion/preferences about our products, services or staff.

Whenever it is reasonable and practicable to do so, we only collect information about individuals directly from those individuals. Occasionally, we may receive information about you from third parties, but if we retain and use such information for any purpose, we will notify you when we receive it. We do not generally collect sensitive information about individuals unless required by applicable laws or rules.

In some cases, we use third-party service providers to collect information on our behalf (for example, for identity verification or compliance checks), including via external platforms.

Where identity verification is conducted via a third-party provider, that provider may collect and temporarily hold information derived from identity documents or other trusted data sources. We do not routinely collect or retain copies of identity documents and instead rely on the verification outcome.

3. Use and Disclosure of Personal Information

We will only use your personal information for the purposes for which we collected it. These purposes include:

- providing products or services that have been requested;
- communicating with you;
- assessing the suitability of prospective tenants;
- helping us manage and enhance our products and services, including analysing customer feedback and future customer needs;
- providing ongoing information and marketing about products and services to individuals that we believe may be interested and where the individual has signed up;
- complying with applicable regulatory and legal obligations (including verifying your identity to comply with anti-money laundering and counter-terrorism financing requirements);
- recruiting employees and contractors;
- fulfilling our obligations to employees;
- providing services to our shareholders;
- on-boarding vendors; and
- any other purpose notified to you at or before the time of collection.

We may disclose your personal information in certain circumstances, such as where we are required or authorised by law or where you have consented to us doing so.

We also may disclose your personal information to:

- others in accordance with a request made by you;
- our related companies and business partners;
- persons engaged in providing us with professional, business, technology and corporate services (including service providers who assist with identity verification, fraud prevention or regulatory compliance functions), when reasonably required; and

When making such a disclosure we will take reasonable steps to ensure that recipients handle personal information in accordance with applicable privacy laws and our requirements. Unless you consent, we otherwise will not disclose your personal information

to third parties.

When we send personal information overseas or use service providers that handle or store data, we take reasonable steps to ensure they protect your personal information and use it appropriately.

Where you have provided your consent, or where otherwise permitted by law (including in accordance with the *Spam Act 2003* (Cth)), we may send you information about our products and services that may be of interest to you. You can opt out of receiving marketing communications at any time by using the unsubscribe facility included in each message or by contacting us at email@cedarwoods.com.au.

4. Security, Storage and Data Quality

We will take reasonable steps to protect personal information that we hold from unauthorised access, modification, misuse, interference and loss. Cedar Woods maintains technical and organisational security measures over its physical premises, and a range of computer and network security measures (such as systems access, firewalls, data encryption) over its electronic systems. Our employees are required to maintain the confidentiality of any personal information held.

If other parties provide support services, Cedar Woods requires them to agree to appropriately protect the privacy of the information provided to them.

We aim to keep personal information only for as long as we need for our business or to comply with the law. When we no longer need personal information and are lawfully able to do so, we will take all reasonable steps to destroy or de-identify personal information.

5. Data Breaches

We take reasonable steps to protect the personal information we hold from misuse, interference, loss, and unauthorised access, modification or disclosure.

In the event of a data breach involving personal information, we will take prompt steps to contain and investigate the incident, and notify affected individuals and the Office of the Australian Information Commissioner (OAIC), where required.

6. International and overseas individuals

We are based in Australia, but we may deal with people and organisations overseas (for example, customers, investors or suppliers). If a privacy law outside Australia also applies to how we handle your personal information (such as the EU or UK General Data Protection Regulation (GDPR)), we will take reasonable steps to comply with it as well as the Australian Privacy Act.

This may include, where required:

- giving you extra information;
- using an appropriate lawful basis for processing; and
- using suitable safeguards for international transfers or storage (for example, reputable service providers and contractual protections).

If you are overseas and want to ask about how we handle your personal information (including any additional rights you may have under overseas laws), please contact us using the details in section 10.0. We will respond within the timeframes required by applicable law.

7. Cookies

We use cookies and similar technologies on our websites to help them work properly and to improve your experience. Cookies may collect information such as your device information,

browser type and how you use our sites.

You can usually change your cookie settings in your browser. Please note that if you disable cookies, some parts of our websites may not work as intended.

8. Accessing and updating your information

We aim to keep the personal information we hold about you accurate and up to date. You can ask to access the personal information we hold about you and to correct it if needed. In some situations, the law allows us to refuse access or correction requests.

If we do not agree to make the change you have requested, we will explain why. You can also ask us to add a note to your record saying that you disagree with the information.

We generally do not charge a fee for access requests. However, in limited circumstances where the law permits, we may charge a reasonable fee to cover our costs. For example, a fee may apply if we need to retrieve information from archived storage, locate and copy a large volume of records, or mail hard copies to you. We will let you know in advance if a fee may apply.

9. Complaints

If you have any questions or concerns about our collection, use or disclosure of personal information, or if you believe we have not complied with this privacy policy or the Privacy Act, please contact us as set out below.

Cedar Woods will take any privacy complaint seriously and will aim to resolve any such complaint in a timely and efficient manner, and our target response time is within 30 days.

Cedar Woods expects that its procedures will deal fairly and promptly with your complaint.

However, if you remain dissatisfied, you can also make a formal complaint with the Officer of the Australian Information Commissioner (which is the privacy regulator in Australia).

Office of the Australian Information Commissioner (OAIC)
Complaints must be made in writing

Tel: 1300 363 992

Post: Director of Compliance
Office of the Australian Information Commissioner
GPO Box 5218
Sydney NSW 2001

Web: www.oaic.gov.au

10. Additional Information on our privacy policy

If you have any questions or concerns regarding this policy, or your rights under this policy, please contact the Cedar Woods Company Secretary on the contact details listed below.

Email: companysecretary@cedarwoods.com.au

Address: PO Box 788, West Perth WA 6872

11. Review and Publication of Policy

We will review this policy periodically to determine its currency and appropriateness to the needs of Cedar Woods. The policy may be amended at any time by Cedar Woods.