

Privacy Policy

The Pines Shopping Centre (Qld) Pty Ltd (ABN 65 055 299 637) ('The Pines Elanora', 'us' or 'we') recognise and value the importance of protecting the privacy of our customers and end-users.

This policy is a simple summary of:

- how and why we collect, hold, use and disclose your personal information;
- our approach to advertising, marketing and security; and
- how you can contact us to access or correct your personal information or ask a question.

What is personal information?

The *Privacy Act 1988* (Cth) (the "**Act**") defines personal information as "*information or an opinion, whether true or not, and whether recorded in a material form or not, about an identified individual, or an individual who is reasonably identifiable.*"

The definition of 'personal information' is therefore extremely broad, but good examples would include your full name and your address.

What personal information do we collect?

We may collect the following types of personal information from you:

- your full name and prefix (e.g. Mr or Mrs)
- your mobile number
- your email address
- your date of birth
- your gender
- your social network contact and publicly available details
- your employer
- your country or state of residence

We will also collect the following information in respect of your use of the wireless internet service ("**WIFI Service**") that we offer:

- the time, date and location of registration
- the duration and frequency of your use of the Service and visits to our premises
- the approximate location of your device while at our premises
- your browsing history while using the Service
- demographic information such as age and gender
- general information from (and a unique identifier for) your browsing device, such as the Media Access Control (MAC) address

You don't have to provide your personal information, but in order to use the WIFI Service, we will require at least an email address.

What do we use your information for?

We collect your personal information for the purposes of providing you information and advertising about our products or services, managing our retail centre, direct marketing, and promotions.

By using our service, you permit us to collect your personal information and you agree to receive information, marketing and promotion material, and allow other uses as described in this policy.

Who do we share personal information with?

We keep your personal information strictly confidential. We will only disclose personal information in accordance with the law. We may disclose your personal information:

- to our insurers and insurance brokers;
- to our commercial and joint-venture partners;
- to third parties who perform services for us;
- to law enforcement or government agencies, including where necessary to meet our statutory obligations;
- where it is required or authorised by law;
- where we use it for the purposes for which it was collected; or
- where you have consented to the disclosure of your personal information.

How do we store personal information?

We protect personal information with appropriate safeguards and security measures and restrict access to those who have a legitimate business purpose and reason for accessing it. Personal information is only retained for as long as it is necessary for the identified purposes or as required by law.

Skyfii, our service provider for the WIFI Service, is part of a group of companies and they may (in certain circumstances) also transfer your personal information between the different Skyfii entities, however will only do so in accordance with all applicable laws including the Act and the *Australian Privacy Principles*. Skyfii security measures include access control procedures, network firewalls, encryption and physical security. Information on the different Skyfii entities comprising the group can be found on their website.

Either Skyfii or our other service providers may also disclose your personal information where it is reasonable to do so or are authorised or required to do so by law. For example, we might disclose your personal information confidentially to a third-party contractor that is contracted to provide services to us. In some circumstances, we also might transfer your personal information overseas (for example as part of our disaster recovery policies in respect of our data). If your information is sent overseas, we will ensure appropriate data handling and security arrangements are in place.

Accessing your personal information

You are entitled to access the personal information we hold about you, on request, subject to a limited number of exceptions. If for some reason we are unable to provide you with access to your personal information, we will provide you with our reasons in writing as well as your further options for complaint. If we did not collect your personal information directly from you, it will ordinarily be more practical for us to pass your access request on to the relevant third party (e.g. our service providers).

You may make an access request via the contact details below and we will respond to your request within a reasonable period. Ordinarily, we will require you to attend our office to access your personal information in secure circumstances, however we will give reasonable

consideration to any other access procedure you may suggest in writing, where it is practicable to do so (in whole or in part). We will not ordinarily charge you for gaining access to your personal information.

Opting out of communications

If you receive direct marketing communications from us, you may easily request not to receive such communications from us by following the instructions on the communication to either opt-out or unsubscribe from further communications.

How can you make a complaint about privacy?

If you ever have an issue or complaint in relation to privacy, please contact us. We take privacy related complaints very seriously and consider all complaints carefully. In most cases, we'll contact you within five working days of receiving your complaint to let you know what action we are taking.

How can you escalate an unresolved complaint?

If you feel your privacy complaint has not been satisfactorily addressed by us, you can contact the Office of the Australian Information Commissioner on 1300 363 992 or find them online at oaic.gov.au.

How to contact us

If you would like to contact us, we may be reached at the details below:

Privacy Compliance Officer
The Pines Elanora
PO Box 4100
Elanora
QLD 4221
AUSTRALIA
E: admin@thepineselanora.com.au
T: 07 5534 6722

This policy is effective as of 1 July 2017. This policy incorporates the relevant provisions of the *Privacy Act 1988 (Cth)* and the Australian Privacy Principles. This policy applies to The Pines Shopping Centre (Qld) Pty Ltd ACN 055 299 637. We may modify or amend the provisions this policy from time to time.