

PRIVACY POLICY

This policy sets out how Connections collects, uses, discloses and manages your personal information and how Connections complies with the Privacy Act 1988 (Cth) ("Privacy Act").

Connections has appointed a Privacy Officer. If you have any queries or complaints regarding your personal information, please contact our Privacy Officer using the contact details listed below.

WHAT IS YOUR PERSONAL INFORMATION?

When used in this privacy policy, the term 'personal information' has the meaning given to it in the Act. In general terms, it is any information that can be used to personally identify you. This may include your name, address, telephone number, email address and profession or occupation. If the information Connections collects personally identifies you, or you are reasonably identifiable from it, the information will be considered to be personal information.

WHAT PERSONAL INFORMATION DO WE COLLECT?

The information we collect about you depends on the products, services or information that you ask us to provide to you. We may collect information such as:

- your name, date of birth, gender and contact details including your physical address, email address and telephone number;
- your employment history, if you apply for a job with us;
- details of products and services that we have supplied to, or you have enquired about, together with any additional information necessary to deliver those products and services and to respond to your enquiries;
- your preferences for particular products, services, facilities or lifestyle activities when you tell us what they are;
- information about you and your family and any characteristics, preferences or requirements that are relevant to the products and services that we may provide to you;
- any additional information relating to you that you provide to us directly through our websites, home visit surveys, or indirectly through use of our websites or online presence or otherwise. That information may include information regarding what web pages you access;
- information you provide to us through our community facilitators or customer surveys from time to time;
- if you are involved in an incident, details about the involvement of you and other people in the incident, witness and incident statements, CCTV footage, medical information and information from medical consultants and other consultants and third parties.

HOW IS YOUR PERSONAL INFORMATION COLLECTED?

Connections will collect your personal information directly from you unless it is unreasonable or impracticable to do so. When collecting personal information from you, we may collect it in ways including:

- through your access and use of our websites;
- through your enrolment and participation in surveys, questionnaires,, competitions and promotions run by or on behalf of Connections;

- during conversations between you and our community facilitators;
- when you make an enquiry, complete an application or purchase order; or
- in the case of incidents in which you are involved, evidence from you, witnesses, CCTV footage, medical consultants and other consultants and third parties.

We may also collect personal information from third parties including from our related companies, third party companies including but not limited to, marketing agencies, data collection agencies, credit reporting agencies, law enforcement agencies and other government entities.

WHAT HAPPENS IF CONNECTIONS CANNOT COLLECT YOUR PERSONAL INFORMATION?

If you decide not to provide Connections with the personal information described above, some or all of the following may happen:

- Connections may not be able to provide the requested products or services to you, either to the same standard or at all;
- Connections may not be able to provide you with information about the products and services that you may want; or
- Connections may be unable to tailor the content of its websites to your preferences and your experience of the websites may not be as enjoyable or useful.

FOR WHAT PURPOSES DOES CONNECTIONS COLLECT, HOLD, USE AND DISCLOSE YOUR PERSONAL INFORMATION?

Connections provides the following services:

- provide welcome and community involvement services to Developers for residents who purchase homes in new communities
- build and maintain community websites on behalf of Developers
- organise and host one-off events on behalf of Developers, stakeholders and community members
- assist residents in setting up and maintaining community associations

Connections collects personal information in order to carry on the above businesses, to provide community-related products and services, to improve our products and services and to communicate with our customers and stakeholders. Personal Information may also be disclosed between Connections' businesses, related companies and trusts.

Connections also collects, holds, uses and discloses your personal information for the following purposes:

- to provide products and services to you and to send information and communications requested by you;
- to inform you of updates concerning Connections and its products and services;
- to assess the performance of the website and to improve its operation;
- to conduct business processing functions including providing personal information to our related bodies corporate, contractors, service providers or other third parties;
- for the administrative, marketing (including direct marketing), planning, product or service development,

- quality control or research purposes of Connections and its contractors and service providers;
- to provide your updated personal information to our contractors or service providers in order for us to provide our products and services to you;
- to update our records and keep your contact details up to date;
- to apply, tender or bid for new contracts with developers
- to process and respond to any enquiry or complaint made by you;
- for risk management purposes including incident investigation, claims management and litigation; and
- to comply with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or in co-operation with any governmental authority

Your personal information will not be shared, sold, rented or disclosed other than as described in this policy. Connections takes all care to protect the anonymity of the residents whose personal information we collect, and whilst we provide reports on demographic information to Developers or when bidding for new contracts the information is not contact information, nor is it able to be specifically linked to individual persons or families. The information is used only to give an indication of the overall demographics of an area, community or estate.

DIRECT MARKETING COMMUNICATIONS

Connections may send you direct marketing communications and information about:

- events, new social groups, competitions and special promotions that we consider may be of interest to you;
- offers or promotions based on how you use our products and services;
- the Developer's products and services (including offers and discounts we've specially negotiated for our customers) we think may interest you, if you've chosen to receive this information.

These communications may be sent in various forms, including by telephone, post, fax, email, SMS or by other forms of electronic messages.

You consent to us sending you those direct marketing communications by any of those methods. If you indicate a preference for a method of communication, we will try to use that method whenever practical to do so.

In addition, at any time you may opt-out of receiving marketing communications from Connections by contacting us (see the details below) or by using any opt-out facilities provided in the marketing communications. If you opt-out using the opt-out details specified in a marketing communication, we will ensure that your name is removed from the mailing list that we used to send you that particular communication. If you wish to opt-out of other (or all) marketing communications or mailing lists, please see below.

TO WHOM DOES CONNECTIONS DISCLOSE PERSONAL INFORMATION?

Connections does not disclose your personal information, except as stated below. Connections takes reasonable steps to ensure that third party recipients do not use personal information for their own purposes and that those parties comply with Connections' privacy policy.

Parties to whom Connections may disclose relevant personal information include:

- consultants, agents or contractors acting on Connections' behalf,
- regulatory authorities where required by law;

- related parties, entities and trusts of Connections; and
- parties to whom Connections has outsourced various functions. Those parties may include the providers of share registry services, catering and restaurant services, contractors or service providers for the purposes of operation of our website or our business, custodians, IT systems administrators, mailing houses, couriers, payment processors, data entry service providers, electronic network administrators, debt collectors, insurers, insurance brokers, marketing agents, claims management services, injury management services and professional advisors such as accountants, lawyers and business advisors.

If any Connections business, company or trust is sold to another organisation, we may transfer any personal information we hold about you to that organisation.

SECURITY OF INFORMATION

No employee is able to access information they do not require for their duties. There are passwords and security access IDs in place to restrict access to confidential and personal information to those who need to perform their duties. Connections takes all reasonable security measures to protect personal information from loss, unauthorised access, destruction, misuse, modification or disclosure.

ACCESS AND CORRECTION OF PERSONAL INFORMATION

If you wish to seek access to the personal information we may hold about you, please contact our Privacy Officer. Where we hold information that you are entitled to access, we will try to provide you with a suitable means of accessing it (for example, by mailing or emailing it to you).

There may be instances where we cannot grant you access to the personal information we hold. For example, we may need to refuse access if granting access would interfere with the privacy of others or it would result in a breach of confidentiality. If that happens we will give you written reasons for the refusal.

If you believe that personal information we hold about you is incorrect, incomplete or inaccurate, then you may request us to amend it. In some unusual cases we may not agree that there are grounds for amending your personal information. If that happens, we will add a note to the personal information stating that you disagree with it.

We will not charge you for simply making the request and will not charge for making any corrections to your personal information. Depending on the nature of the request, we may ask you to verify your identity, put your request in writing and to complete an enquiry form, which will be sent to you.

You may contact our Privacy Officer by:

- Email: info@connections.com.au; or
- Post: Privacy Officer, Connections, PO Box 339, Kellyville, NSW, 2155

CHANGES TO CONNECTIONS' PRIVACY POLICY

Connections reserves the right to modify or amend this privacy policy at any time and will update the privacy policy on Connections' website if it has been changed. If you have any further questions about Connections' privacy policy, please contact Connections' Privacy Officer.