

INTRODUCTION

Lowe Group Holdings ACN 625 052 431 and their related companies (hereinafter “we”, “us” or “our”) complies with the Australian Privacy Principles (APPs) as set out in the Privacy Act 1988 (Cth) (Privacy Act). The APPs regulate the manner in which we can collect, use, hold, disclose and destroy personal information.

We are committed to the protection of personal privacy and have adopted a policy to protect information about individuals.-

This policy describes the type of information we collect and hold, how we use that information, how that information may be disclosed, the security of that information, how you can access and correct any such information and other relevant details concerning your privacy.

1. COLLECTION METHODS OF PERSONAL INFORMATION

Real estate buyers – We may collect personal information from you if you buy a property from us, take steps to do so or choose to subscribe for property alerts, newsletters and similar content.

This may include your contact details and other personal information required for inclusion in a contract of sale. Before you may enter a property for a display suite inspection, you will be asked to provide your name and telephone number. Our staff record your personal information such as your name and telephone number. If you would prefer not to provide your personal information, then we may refuse you entry or permission to the property to inspect the display suite.

Website content subscribers – You may provide personal information to us in order to receive information about products or services offered through this website, to purchase such products and services, to receive newsletters or to become involved in our promotions or other initiatives.

This personal information may include details such as your name, age, gender, contact information, products and services which you are interested in or require more information about. If you purchase or request products and services from us, we may also request your preferences for receiving further marketing or promotional material.

The choice of how much information you provide to us is yours.

We seek information through this website either to process your request for information and provide that information to you, to improve the quality of our products and services or to assist you to determine which products and services best meet your needs.

We may also collect and store information about your visit to our website, including:

- The name of the domain from which you accessed the internet
- The date and time you accessed the website
- The internet address of the website from which you linked directly to the website
- The pages you accessed while visiting the website

This information does not in itself identify you and is used to measure the number of visitors to the website and how it was navigated. This information assists us to make the website more useful to you.

We also collect information from the website content subscribers (persons registering their details with us through the website) or website visitors for improving our quality and effectiveness and to provide you with the information. We welcome feedback from you about all aspects of our website. We store feedback that our users send to us. This feedback is used to administer and refine our services and to improve or promote our website. We will not publish your name in connection with any information you provide (without your prior permission).

2. PURPOSE FOR COLLECTING, HOLDING, USING AND DISCLOSING PERSONAL INFORMATION

If you enquire about a property that we have available or you attend a display suite for inspection we may hold and use your information:

- for your safety and security, the security of the occupants of the property and the safety and security of our staff
- to provide additional information in relation to the property to you, unless you advise us differently
- to provide such information to relevant authorities, including, but not limited to, ambulance and hospital staff, police, and insurers if an accident occurs or the property sustains damage,
- to provide such information to relevant authorities, including but not limited to ambulance and hospital staff, police, and insurers if a crime is committed or is suspected of having been committed at the property
- to enable us to promote to you other properties which we have for sale
- We may also be required to collect and use your personal information under Commonwealth and Victorian laws relating to the sale of real estate, taxation, foreign investment, money laundering and terrorism.

The personal information obtained from this website is used, where you have so requested:

- to provide products and services to you
- to provide you with information, newsletters or other communications
- to involve you in promotions and other initiatives undertaken by us

Some of the uses of the information described above may be provided by third parties, who are authorised to use this personal information for these purposes.

Information collected from this website may also be used to determine demographic and usage patterns. Personal identification information is not used for this purpose. This anonymous information is then used to better develop and tailor this website and our products and services for our customers and potential customers. This non-personal information may be passed on to third parties.

We may use your personal information for direct marketing or promotional activities. However, if we do undertake such activities, you will be provided with an opportunity when first contacted to decline to receive any further communications from us. We may also use your personal information for all reasonably foreseeable related purposes, including for example, for billing and account management.

Other than for the purposes described above, we will not use your personal information without your prior consent. The only exception to this rule is where disclosure is necessary to prevent injury to life or health, to investigate any suspected unlawful activity or where it may be required

by law such as in a response to a warrant, subpoena or other legal process.

3. SECURITY OF YOUR INFORMATION

We hold your information in electronic and hard copy form.

We take reasonable steps to ensure the security of all information we collect from risks such as loss or unauthorised access, destruction, misuse, modification or disclosure of data.

We do this by, for example:

- maintaining your personal information in a secure (either physical or online) environment which can be accessed only by authorised personnel;
- incorporating strict password access and virus protection procedures into all electronic databases;
- taking all reasonable steps to keep our business premises secure; and
- providing appropriate and regular training to staff regarding this policy and information handling practices.

However, no data transmission over the internet or information stored on servers accessible through the internet can be guaranteed to be fully secure. These activities are undertaken at your risk.

4. DISCLOSURE OF PERSONAL INFORMATION

We will not disclose or pass on your personal information to third parties unless it is in accordance with this privacy statement or with your prior consent. Information may be provided to third parties:

- where any functions or services are being outsourced or you would reasonably expect us to disclose it to a third party for a particular purpose
- where disclosure is necessary to prevent injury to life or health, to investigate any suspected unlawful activity or where it may be required by law such as in a response to a warrant, subpoena or other legal process.

We do not generally disclose personal information to overseas recipients and will not do so before taking reasonable steps to ensure that an overseas recipient is compliant with Australian Privacy Principles (“APP’s”), other than APP 1.

5. ACCESS AND CORRECTION OF PERSONAL INFORMATION

We will continue to hold personal information that we collect about you whilst it is reasonably necessary for our purposes outlined in this Policy, in accordance with our record keeping obligations. You may make a written request for us to de-identify your personal information at any time. If we refuse to de-identify your personal information, we will provide you with written reasons as to why your request has been refused.

You may request access at any time to the personal information that we hold about you:

- in the case of information you provide through this website, by emailing us at the contact address shown on this website
- in the case of information you provide directly to an agent, by contacting the agent directly.

If any information is incorrect, incomplete or out-of-date please advise us and we will update it.

6. LINKS TO OTHER WEBSITES

We are not responsible for the privacy practices or content of any other website that is linked to this website. It is your responsibility to investigate the privacy policies of those other sites.

7. CHANGES TO PRIVACY POLICY

This privacy policy may change from time to time particularly as new rules, regulations and industry codes are introduced. A current version of our policy will be available at all times on our website and otherwise on request.

This Policy was last updated in July 2018.

8. COMPLAINTS PROCEDURE

If you believe that your privacy has been breached, please contact us using the contact information below. We will treat your complaint confidentially, investigate it and aim to ensure that your complaint is resolved within a reasonable time.

9. HOW TO CONTACT US

If you have any concerns or questions or would like to opt-out of direct marketing promotions, please use contact details as found in this website or alternatively please send an email to info@lowegroup.com.au or by writing to the Privacy Officer, Lowe Group, 210 Bluff Road, Sandringham, Victoria 3191.

Thank you for taking the time to read our Privacy Policy.