# HWL **Privacy Policy**

LAWYERS

3L Bridgefields Ptv Ltd ("we", "us", "our") are bound by the Australian Privacy Principles in the Privacy Act 1988 (Cth).

We understand the importance of, and are committed to, protecting your personal information. This Privacy Policy explains how we manage your personal information, including our obligations and your rights in respect of our dealings with your personal information.

You also agree to the privacy policy of our agent, Oliver Hume Real Estate Group Pty Ltd, which you can view here: Oliver Hume Privacy Policy. Oliver Hume Real Estate Group Pty Ltd, in providing services for us, also uses some of your personal information.

#### 1. **Personal information**

"Personal information" is information or opinion about an identified individual, or an individual who is reasonably identifiable.

We collect and hold personal information that is reasonably necessary for, or directly related to, one or more of our functions or activities as the supplier of goods and services. This information may include (as well as other information):

- your name and date of birth;
- your contact details including residential address, email address and telephone number;

"Sensitive information" is information or opinion about an individual which is:

- personal information which is also information or an opinion about the individual's racial or ethnic origins, political opinions, political association membership, religious beliefs or affiliations, philosophical beliefs, professional or trade association membership, trade union membership, sexual orientation or practices, or criminal record; or
- health, genetic or biometric information about the individual.

We will only collect sensitive information (including health information) about you with your consent, except where we are required or permitted by law to collect your sensitive information without your consent.

#### 2. Collection and use

#### Purpose

We collect and use personal information about you so that we can provide you with the goods and services you have requested or inquired about. We also use your personal information to inform you of other products or services available from us. We may also contact you via surveys to conduct research about your opinion of us and our goods and services.

We do not sell, rent or lease your personal information to third parties.

You have the right to refuse to provide us with personal information. However, if you decide to do so, we may be unable to provide you with the goods and services you have requested or inquired about.

#### Method of collection

We only collect personal information by lawful and fair means. We generally collect personal information directly from you. This information will generally come from what has been provided in your credit application forms.

We or may collect personal information, including your credit history, about you from third parties, such as credit reporting agencies.

# Unsolicited information

If we receive personal information about you that we have not requested, and if we determine that we could not have lawfully collected that information under privacy law if we had requested it, we will destroy or de-identify the information, if it is lawful and reasonable to do so.

# 3. Disclosure

In general, we do not use or disclose your personal information for a purpose other than:

- a purpose set out in this Privacy Policy;
- a purpose you would reasonably expect;
- a purpose required or permitted by law; or
- a purpose otherwise disclosed to you to which you have consented.

We may also disclose your personal information to other organisations, for example, to:

- our related companies (if any);
- government or regulatory authorities, where required or permitted by law.

We take all reasonable steps to ensure that these organisations are bound by confidentiality and privacy obligations with respect to the protection of your personal information.

We are unlikely to disclose your personal information to any overseas recipients.

## 4. Access

You may request access to the personal information that we hold about you by contacting us.

We will deal with your request for such access within a reasonable time. If we refuse access, we will provide you with a written notice which sets out the reasons for the refusal and the relevant provisions of the *Privacy Act* that we rely on to refuse access.

We may recover reasonable costs in relation to a request for access to personal information.

# 5. Accuracy

We take reasonable steps to make sure that the personal information we collect is accurate, up-todate and complete. We take reasonable steps to make sure that the personal information we use or disclose is accurate, up-to-date, complete and relevant. Where we believe that the personal information we hold is inaccurate, out-of-date, incomplete, irrelevant or misleading, we will taken reasonable steps to correct that information.

You may also request that we correct your personal information that we hold by contacting us by using the contact details provided above. We will take reasonable steps to correct the information to ensure that it is accurate, up-to-date, complete, relevant and not misleading.

We will deal with your request to correct your personal information within a reasonable time. If we do not agree with the corrections you have requested, we are not obliged to alter you personal information accordingly. However, where we refuse to correct any personal information as requested by you, we will give you a written notice which sets out the reasons for our refusal.

# 6. Security

We hold your personal information in paper-based and/or electronic files. We take all reasonable steps to ensure that your personal information which is kept in our files is protected from:

- misuse, interference and loss; and
- unauthorised access, modification or disclosure.

This means that, in respect of our paper-based files, we maintain various security systems on our premises, and in respect of electronic files, we maintain secure electronic network systems.

When we no longer require your personal information (including when we are no longer required by law to keep records relating to you), we ensure that it is destroyed or de-identified.

### 7. Website

This section explains how we handle personal information collected from our website. If you have any questions or concerns about transmitting your personal information via the internet, you may contact us, as there are other ways for you to provide us with your personal information.

#### Visiting our website

Anytime you access an unsecured part of our website, that is, a public page that does not require you to log on, we will collect information about your visit, such as:

- the time and date of the visit;
- any information or documentation that you download;
- your browser type; and
- your server address.

#### Cookies

A "cookie" is a small text file which is placed on your internet browser and which we access each time you visit our website. When you visit the secured pages of our website (ie pages that you have to provide login details to access) we use cookies for security and personalisation purposes. When you visit the unsecured pages of our website (ie public pages that you can access without providing login details) we use cookies to obtain information about how our website is being used.

You may change the settings on your browser to reject cookies, however doing so will prevent you from access the secured pages of our website.

#### Email

When we receive emails, we will retain the content of the email and our response to you where we consider it necessary to do so.

Your email address will only be used or disclosed for the purpose for which is was provided. It will not be added to any mailing lists or used for any other purpose without your consent.

#### Security

We make reasonable efforts to ensure that the most up-to-date security measures are used on our website to protect your personal information. Any data containing personal information which we transmit via the internet is encrypted. However, we cannot guarantee that any information transmitted via the internet by us, or yourself, is entirely secure. You use our website at your own risk.

#### Links on our website

Our website may contain links to third party websites. We advise that the terms of this Privacy Policy do not apply to external websites. If you wish to find out how any third parties handle your personal information, you will need to obtain a copy of their privacy policy.

# 8. Marketing

We may use your personal information, including your contact details, to provide you with information about products and services which we consider may be of interest to you. We may do this even if you are on the Do Not Call Register.

We may also provide your details to other organisations for specific marketing purposes.

**You may opt out at any time** if you no longer wish to receive marketing information. In order to do so, you will need to request that we no longer send marketing materials to you or disclose your information to other organisations for marketing purposes. You can make this request by using the contact details provided above, or by "unsubscribing" from email marketing messages.

# 9. Questions and complaints

If you have any questions, concerns or complaints about this Privacy Policy, or our use of your personal information, please contact us. You can also contact us if you believe that the privacy of your personal information has been compromised or is not adequately protected.

Once a complaint has been lodged, we will respond to you as soon as possible.

You may also lodge a complaint with the Office of the Australian Information Commissioner by telephone: 1300 363 992 or email: <u>enquiries@oaic.gov.au</u>.

# 10. Changes to the Privacy Policy

We may make changes to this Privacy Policy from time to time, without notice to you. An up-to-date copy of our Privacy Policy is available on our website.