
Effective date	10 May 2019
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Approved by	FPA Board
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Privacy Policy

Policy

Privacy is important to us.

This policy tells you how Frasers Property manages the personal information it holds and how it complies with its privacy obligations.

This is the Privacy Policy for all divisions and organisations within Frasers Property, except Real Utilities. So, in this Privacy Policy, when we say **Frasers Property** (or **we**, or **us**), we mean all divisions and organisations within Frasers Property Australia, excluding Real Utilities. When we say **Website**, we mean the the website that is operated by Frasers Property Australia under the domain name www.frasersproperty.com.au (excluding the pages and website operated by Real Utilities). And when we say **Real Utilities** we mean Real Utilities Pty Limited and each of its subsidiaries that is listed [here](#). Real Utilities has its own, separate Privacy Policy which you can read [here](#).

Please read this entire Privacy Policy before using this Website or submitting personal information to us or our agents or contractors.

It is Frasers Property's policy to respect the confidentiality of information and the privacy of individuals. Frasers Property must comply with the Australian Privacy Principles (**Principles**) in the *Privacy Act 1988* (Cth) (**Privacy Act**). The Principles are designed to protect the privacy of individuals by regulating the way personal information is managed.

In summary, the Principles define 'personal information' as information or an opinion about an identified individual or an individual who is reasonably identifiable, whether the information or opinion is true or not and whether the information or opinion is recorded in a material form or not.

Your consent

By using this Website or giving Frasers Property your personal information in any other way (directly to us or through others), you agree with the terms of this Privacy Policy and consent to the collection, use and disclosure of that information in accordance with this Privacy Policy, the Privacy Act, including the Principles, and other applicable privacy laws.

What kind of personal information do we collect?

The type of personal information we collect, hold and use depends on the products, services or information that you ask us to provide and may include (but is not limited to):

- ◆ information that identifies an individual, for example, names, address, date of birth, age, gender, contact details (like phone numbers and email addresses) and tax file number;
- ◆ information needed to verify the identity of an individual (for example, a passport or driver's licence);
- ◆ information about an individual's financial capacity or credit-worthiness;

- ◆ an individual's employment history and other information collected as part of a recruitment process;
- ◆ information collected through security cameras or video surveillance;
- ◆ an individual's opinions and preferences about the products and services offered by Frasers Property;
- ◆ information that Frasers Property is required or authorised to collect by law; and
- ◆ electronic information from your use of our Website (see below).

The types of individuals we usually collect this information about include:

- ◆ Our customers, clients, tenants and suppliers and potential customers, clients, tenants and suppliers, including people who:
 - buy or express an interest in buying a property from or through us;
 - rent or express an interest in renting premises from us; and
 - enter Frasers Property owned or managed shopping centres, buildings or other sites;
- ◆ job applicants, employees, and contractors;
- ◆ people who use our Website, social media, mobile applications, wireless facilities (provided in a Frasers Property owned or managed shopping centre, building or other site) and other online services;
- ◆ people who register to receive electronic newsletters or other communications from us;
- ◆ people who participate in surveys, competitions or promotions we run;
- ◆ members of Frasers Property Australia's Prosperity Loyalty Program;
- ◆ people to whom we provide other products and services from time to time; and
- ◆ other people who may come into contact with one of the divisions or organisations within Frasers Property.

We may obtain personal information through telephone conversations with you, internet enquiries you make, forms you fill out (online or in person), face-to-face meetings or interviews, or from a third party (for example, from sales agents acting on our behalf or from a person who provides a reference).

There may be some instances where personal information about you will be collected indirectly because it is unreasonable or impractical to collect it directly from you. For example, we may obtain a reference from a third party. We will usually notify you about these instances in advance, or where that is not possible, as soon as reasonably practicable after the information has been collected.

We may ask for other information voluntarily from time to time (for example, through market research or surveys) to enable us to improve our service or consider the wider needs of our customers or potential customers.

If you use our Website

If you use our Website, we may also collect additional personal information about you in the form of your IP address or domain name. Our Website uses cookies. We use cookies to monitor usage of our Website and to create a personal record of when you visit our Website and what pages you view so that we can market to you and service you more efficiently. We may also use third party advertising programs that use cookies to display more relevant advertisements on third party websites. Cookies do not identify you personally but they may be linked with personal information

we hold, if you complete an online registration form on the Website or if you have otherwise consented to us handling that personal information. In that case, we will treat the cookie data in the same way that we treat the personal information that it is linked with.

Exception in relation to employee records

Frasers Property is not required to comply with the Principles in relation to Frasers Property's treatment of an employee record held by Frasers Property and relating to an employee, if the treatment is directly related to the current or former employment relationship between Frasers Property and that employee.

How do we use this information and to whom may we disclose it?

Our business is to understand and meet your needs and provide the services that you require. To do this effectively we need to collect a range of personal information about you.

Frasers Property uses personal information for the primary purpose for which it is collected, or for secondary purposes which are related to the primary purpose.

In general, Frasers Property uses personal information for the following purposes:

- ◆ to verify your identity;
- ◆ to provide products or services that have been requested;
- ◆ to help us manage and enhance our products and services, including by analysing customer feedback and future customer needs;
- ◆ to communicate with you;
- ◆ to assess the suitability of prospective tenants;
- ◆ to provide ongoing information and marketing about our products and services to people we believe may be interested;
- ◆ to manage safety and security at Frasers Property managed shopping centres, buildings and other sites;
- ◆ to comply with legal and regulatory obligations; and
- ◆ to recruit employees and contractors.

Depending on the product or service concerned, we may disclose personal information to:

- ◆ other divisions or organisations within Frasers Property;
- ◆ joint venture and alliance partners;
- ◆ service providers and specialist advisers to Frasers Property who have been contracted to provide Frasers Property with agency, legal, administrative, financial, research or other services to assist Frasers Property with its business or to provide customer service;
- ◆ third party lenders, insurers and credit providers, and courts, tribunals and regulatory authorities as agreed or authorised by law and other third parties as required by law;
- ◆ credit reporting or reference agencies or insurance investigators; or
- ◆ anyone whom an individual has authorised such disclosure to, as specified by that individual or provided for in a contract (including where the contract states that consent has been obtained from the relevant individual).

We generally require that organisations outside Frasers Property who handle or obtain personal information as service providers to Frasers Property acknowledge their obligations with respect to personal information, undertake to respect any individual's right to privacy and comply with the Principles and this Privacy Policy. We also generally require that these organisations use this personal information only for our purposes and otherwise follow our reasonable directions with respect to this information.

In most cases, if you do not provide this personal information about yourself which Frasers Property has requested, Frasers Property may not be able to provide you with the relevant product or service.

Sensitive information is subject to greater restrictions

Some personal information which we collect is 'sensitive'. Sensitive information includes a person's racial or ethnic origin, religion, membership of political bodies or trade unions, sexual preferences or activities, criminal record, health information and medical history. The way we use tax file numbers and information received from a credit reporting agency about an individual is also restricted by law. Sensitive information, specifically health information, may be relevant to applications by prospective employees and while consent will be sought before this is obtained, we may not be able to adequately assess candidates' suitability for some positions without this information. The Principles require that sensitive information is used and disclosed only for the purposes for which it was provided, or a directly related secondary purpose, unless you agree otherwise or for other specific reasons such as if the use or disclosure of this information is required by law (for example, to prevent a crime or serious injury). Documents asking for sensitive information will explain this.

Management and security of personal information

We have appointed a National Privacy Compliance Officer to oversee our management of personal information in accordance with this Privacy Policy and the Privacy Act. Frasers Property trains its employees who handle your information to respect the confidentiality of customer information and your privacy. Frasers Property takes breaches of your privacy very seriously.

Data breach

A '**data breach**' is any unauthorised access to, unauthorised disclosure of, or loss of, personal information held by Frasers Property that is likely to result in serious harm to you. If Frasers Property suspects or becomes aware of a data breach, we will:

- ◆ investigate and handle the data breach; and
- ◆ tell you and the Australian Information Commissioner about the data breach as soon as practicable,

in accordance with our Cyber Security Data Breach Protocol and the Privacy Act.

How do we store personal information?

Safeguarding the privacy of your information is important to us, whether you interact with us personally, by telephone or mail, by email or over the internet or through other electronic media. We hold personal information in a combination of secure computer storage facilities and paper based files and take reasonable steps to protect the personal information we hold from misuse, loss, unauthorised access, modification or disclosure. The Principles also require us not to store personal information longer than necessary. Where we no longer require any personal information that we

hold, we will take such steps as are reasonable in the circumstances to destroy the information or to ensure that the information is de-identified.

Frasers Property will only send your personal information overseas if we are authorised to do so by law, for any of the purposes set out in this Privacy Policy (but only to parties that are subject to obligations in relation to personal information no less onerous than those in this Privacy Policy) or if you have consented to us doing so.

Frasers Property will store your personal information in Australia for the purposes set out above. In the course of our ordinary business operations we commonly disclose personal information to third parties located in New Zealand, UK, USA, Canada, Germany, the Netherlands, Hong Kong, China and Thailand.

Links to other websites

This Website may contain links or references to other websites to which this Privacy Policy may not apply. You should check the privacy policies of those website before providing your personal information.

How do we keep personal information accurate and up-to-date?

We will take all reasonable steps to ensure that the personal information we hold about you is accurate and up-to-date. We realise that this information changes frequently with changes of address and other personal circumstances. So, please contact us as soon as possible to update any personal information we hold about you – our contact details are set out below.

You have the right to check what personal information about you is held by us

Under the Principles, you have the right to obtain a copy of any personal information which we hold about you and to advise us of any perceived inaccuracy. The Principles set out some exceptions to this. To make a request to access information we hold about you, please contact us in writing. We will require you to verify your identity and to specify what information you require. We may charge a reasonable fee to cover the cost of locating, retrieving, reviewing and copying any material requested. If the information you seek is extensive, we will advise the likely cost in advance and can help to refine your request if required.

What if you have a complaint?

If you think that any action of Frasers Property breaches this Privacy Policy or the Principles, you can make a complaint by contacting our National Privacy Compliance Officer. We will try to act promptly in response to any complaint. If you are not satisfied with our response to your complaint, you can contact the Office of the Australian Information Commissioner by phone, email, fax or post:

Email: enquiries@oaic.gov.au

Phone: 1300 363 992

Postal address: Office of the Australian Information Commissioner
GPO Box 5218
Sydney NSW 2001

How to contact us

You can contact our National Privacy Compliance Officer about a privacy related issue by email, phone or post:

Email: companysecretariat@frasersproperty.com.au

Phone: (02) 9767 2042

Postal address: Frasers Property Australia
Attention: National Privacy Compliance Officer
PO Box 3307
Rhodes NSW 2138

Updates to this Policy

This Privacy Policy will be reviewed from time to time to take account of new laws and technology, changes to our operations and practices and the changing business environment. Before you give us personal information, please check the version of this Privacy Policy on our Website for any changes.

Review of this Policy

This Privacy Policy will be reviewed by the Company Secretariat and Frasers Property legal counsel as appropriate.

Version

This Privacy Policy was last updated on 10 May 2019.