

GURNER™ PRIVACY POLICY

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I. BACKGROUND

I.1 GURNER™'S COMMITMENT TO PRIVACY

GURNER RE MANAGEMENT PTY LTD ABN 15 677 189 490 (**GURNER™**) IS COMMITTED TO PROTECTING YOUR PRIVACY, IN ACCORDANCE WITH APPLICABLE AUSTRALIAN PRIVACY LAWS.

WE UNDERSTAND THE IMPORTANCE OF BEING OPEN AND TRANSPARENT WITH YOU IN THE WAY IN WHICH WE COLLECT, HOLD, STORE, USE AND SHARE YOUR PERSONAL INFORMATION. WE TAKE PROTECTING YOUR PRIVACY VERY SERIOUSLY.

WE STRONGLY ENCOURAGE YOU TO READ THIS DOCUMENT, SO THAT YOU UNDERSTAND AND ARE COMFORTABLE WITH HOW WE HANDLE YOUR PERSONAL INFORMATION. IF YOU HAVE ANY QUESTIONS ABOUT THIS DOCUMENT, OR ABOUT GURNER™'S HANDLING OF YOUR PERSONAL INFORMATION, PLEASE CONTACT US USING THE RELEVANT CONTACT DETAILS SET OUT IN SECTION 15.

I.2 ABOUT GURNER™

GURNER™ IS A COLLECTIVE GROUP OF DESIGN, DELIVERY AND OPERATION SERVICES BASED IN MELBOURNE, AUSTRALIA. THE GURNER™ GROUP HAS DEVELOPMENTS NATIONALLY AND IT INCLUDES MAJOR, MIXED-USE, BOUTIQUE AND LUXURY HOMES PROJECTS AS WELL AS HOSPITALITY PROJECTS. WE AIM TO BE THE WORLD'S LEADING ASPIRATIONAL LIFESTYLE AND DESIGN BRAND,

THE GURNER™ GROUP INCLUDES A NUMBER OF AUSTRALIAN SUBSIDIARIES AND AFFILIATES, INCLUDING:

BTS I INVESTMENT MANAGER CO PTY LTD ABN 15 677 192 719

GURNER DESIGN STUDIO PTY LTD ABN 28 677 191 525

GURNER RE SALES HOLDINGS PTY LTD ABN 679 717 143 (AND SUBSIDIARIES)

HAWKSURN PLACE HOSPITALITY CO PTY LTD ABN 79 677 192 111

LIFE BY SAINT MORITZ PTY LTD ABN 84 648 589 995

LIFE R.E.P.M. PTY LTD ABN 75 647 929 799

GURNER GROUP WELLNESS OPERATIONS PTY LTD ABN 38 670 532 975
AND GURNER GROUP WELLNESS (SAINT) OPERATIONS PTY LTD ABN 93
675 336 517 (GURNER™ WELLNESS GROUP)

(TOGETHER, THE GURNER™ GROUP).

1.3 OUR OBLIGATIONS

WE ARE REQUIRED TO COMPLY WITH THE *PRIVACY ACT 1988* (CTH) (**PRIVACY ACT**) AND THE AUSTRALIAN PRIVACY PRINCIPLES (**APPS**). THE APPS REGULATE THE MANNER IN WHICH PERSONAL INFORMATION IS HANDLED THROUGHOUT ITS LIFE CYCLE, FROM COLLECTION TO USE AND DISCLOSURE, SECURITY, ACCESSIBILITY AND DISPOSAL.

WE ARE ALSO REQUIRED TO COMPLY WITH MORE SPECIFIC PRIVACY LEGISLATION IN SOME CIRCUMSTANCES, SUCH AS:

- APPLICABLE STATE AND TERRITORY HEALTH PRIVACY LEGISLATION (INCLUDING THE *HEALTH RECORDS ACT 2001* (VIC) (**HR ACT**)) WHEN WE COLLECT AND HANDLE HEALTH INFORMATION IN THE RELEVANT JURISDICTION; AND
- THE *SPAM ACT 2003* (CTH) AND THE *DO NOT CALL REGISTER ACT 2006* (CTH).

1.4 WHEN DOES THIS PRIVACY POLICY APPLY AND WHAT IS IT?

THIS POLICY IS DESIGNED TO GIVE YOU A GREATER UNDERSTANDING OF HOW WE COLLECT, USE, DISCLOSE AND OTHERWISE HANDLE PERSONAL INFORMATION.

THIS PRIVACY POLICY APPLIES TO ALL AUSTRALIAN GURNER™ GROUP WEBSITES, SUBSIDIARIES, AFFILIATES AND BUSINESSES, UNLESS THAT WEBSITE SUBSIDIARY, AFFILIATE OR BUSINESS HAS ADOPTED A SEPARATE PRIVACY POLICY.

IN THIS PRIVACY POLICY, "**WE**", "**US**" AND "**OUR**" REFERS TO THE GURNER™ GROUP AND "**YOU**" AND "**YOUR**" REFERS TO ANY INDIVIDUAL ABOUT WHOM WE COLLECT PERSONAL INFORMATION.

OUR PRIVACY POLICY EXPLAINS HOW WE COLLECT, STORE, PROCESS, USE AND DISCLOSE PERSONAL INFORMATION (INCLUDING PERSONAL INFORMATION WE COLLECT, AND PERSONAL AND HEALTH INFORMATION SUBMITTED TO US, WHETHER OFFLINE OR ONLINE). FOR EXAMPLE, THIS CAN INCLUDE INFORMATION WE MAY COLLECT:

- WHEN A PURCHASER BUYS A PROPERTY FROM US;

- WHEN A SUPPLIER CREATES A TRADING ACCOUNT OR ONLINE ACCOUNT WITH US;
- WHEN A CUSTOMER JOINS MEMBERSHIP OR LOYALTY PROGRAM;
- WHEN AN INDIVIDUAL SUBSCRIBES TO RECEIVE SPECIAL OFFERS AND PROMOTIONS OR ENTERS A COMPETITION;
- TO ENSURE THAT GURNER™ WELLNESS GROUP SERVICES AND FACILITIES WE PROVIDE ARE APPROPRIATE AND SAFE FOR YOU;
- TO ADMINISTER YOUR GURNER™ WELLNESS GROUP MEMBERSHIP AND COLLECT YOUR MEMBERSHIP FEES;
- TO PROVIDE HEALTH AND WELLNESS RECOMMENDATIONS VIA OUR APP BASED ON YOUR OURA RING READINESS SCORE OR WHOOP BAND INFORMATION. THIS DATA IS ONLY STORED FOR 24 HOURS ON A SECURE SERVER;
- WHEN A SUPPLIER INTERACTS WITH US ON A COMMERCIAL BASIS;
- WHEN A JOB APPLICANT APPLIES FOR A POSITION WITH US; AND
- WHEN YOU INTERACT WITH US (INCLUDING WHEN YOU VISIT ONE OF OUR PREMISES IN PERSON, WHEN YOU VISIT OUR WEBSITES (SUCH AS WWW.GURNER.COM.AU, WWW.LIFEREALESTATEGROUP.COM.AU, WWW.BARBBIANCO.COM.AU, WWW.BAJAMODERNMEXICAN.COM), WWW.SAINTHAVEN.COM.AU, WWW.SAINTPRIVATECLUB.COM.AU OR CONTACT AND COMMUNICATE WITH US VIA OUR SOCIAL MEDIA CHANNELS (SUCH AS VIA FACEBOOK, INSTAGRAM, YOUTUBE OR LINKEDIN), PHONE OR ONLINE).

YOUR PERSONAL INFORMATION THAT IS COLLECTED BY ONE GURNER™ GROUP ENTITY WILL BE SHARED WITH ALL ENTITIES WITHIN THE GURNER™ GROUP AND BY PROVIDING US WITH YOUR PERSONAL INFORMATION YOU CONSENT TO YOUR PERSONAL INFORMATION BEING USED IN THIS WAY.

OTHER TERMS AND CONDITIONS MAY ALSO APPLY TO YOU, SUCH AS:

- THE TERMS AND CONDITIONS CONTAINED IN OUR TERMS AND CONDITIONS (AS APPLICABLE TO YOU); AND
- COLLECTION NOTICES AND PRIVACY STATEMENTS WHICH MAY BE PROVIDED TO YOU AT THE TIME YOUR PERSONAL INFORMATION IS COLLECTED.

A COPY OF THIS PRIVACY POLICY IS AVAILABLE ON OUR WEBSITE AT WWW.GURNER.COM.AU OR YOU CAN REQUEST A COPY BY CONTACTING OUR PRIVACY OFFICER (DETAILS UNDER HEADING 15 BELOW).

1.5 WHAT IS PERSONAL INFORMATION?

WHEN USED IN THIS PRIVACY POLICY, THE TERM 'PERSONAL INFORMATION' HAS THE MEANING GIVEN TO IT IN THE PRIVACY ACT. IN GENERAL TERMS, THE LEGISLATION DEFINES 'PERSONAL INFORMATION' AS INFORMATION OR AN

OPINION ABOUT AN IDENTIFIED INDIVIDUAL OR AN INDIVIDUAL WHO IS REASONABLY IDENTIFIABLE, WHETHER THE INFORMATION IS TRUE OR NOT AND WHETHER THE INFORMATION OR OPINION IS RECORDED IN A MATERIAL FORM OR NOT. THIS MAY INCLUDE YOUR NAME, ADDRESS, TELEPHONE NUMBER, EMAIL ADDRESS AND PROFESSION OR OCCUPATION. IF THE INFORMATION WE COLLECT PERSONALLY IDENTIFIES YOU, OR YOU ARE REASONABLY IDENTIFIABLE FROM IT, THE INFORMATION WILL BE CONSIDERED 'PERSONAL INFORMATION'.

1.6 EMPLOYEE RECORDS

WE ARE GENERALLY EXEMPT FROM THE PRIVACY ACT WHEN WE COLLECT AND HANDLE EMPLOYEE RECORDS AND THIS PRIVACY POLICY DOES NOT APPLY TO THAT INFORMATION. HOWEVER, WHERE STATE OR TERRITORY HEALTH PRIVACY LEGISLATION APPLIES, WE ARE STILL REQUIRED TO PROTECT THE PRIVACY OF EMPLOYEE HEALTH INFORMATION. THIS PRIVACY POLICY WILL APPLY IN THOSE CIRCUMSTANCES.

2. WHAT WE COLLECT

2.1 GENERAL

THE TYPE OF PERSONAL INFORMATION THAT WE COLLECT ABOUT YOU DEPENDS ON THE TYPE OF DEALINGS YOU HAVE WITH US.

IN SOME CIRCUMSTANCES WE MAY ISSUE PARTICULAR PERSONAL INFORMATION COLLECTION STATEMENTS SUCH AS THAT FOR THE GURNER™ WELLNESS GROUP SET OUT AT ATTACHMENT A. THE GENERAL INFORMATION IN THIS POLICY SHOULD BE READ SUBJECT TO ANY MORE PARTICULAR INFORMATION SET OUT IN A RELEVANT PERSONAL INFORMATION COLLECTION STATEMENT.

IN SUMMARY, WE MAY COLLECT YOUR PERSONAL INFORMATION WHEN YOU:

- MAKE A PURCHASE OR COMPLETE PURCHASE ORDERS FOR OUR PRODUCTS (IN PERSON OR ELECTRONICALLY);
- CREATE AN ONLINE ACCOUNT WITH US;
- CREATE A PROFILE IN OUR APP;
- APPLY TO BE A GURNER™ WELLNESS GROUP MEMBER;
- COMMUNICATE WITH US DURING COMPETITIONS, MARKETING, SPECIAL EVENTS AND PROMOTIONAL ACTIVITIES;
- INTERACT WITH US IN PERSON (SUCH AS WHEN YOU VISIT ONE OF OUR RESTAURANTS), VIA OUR ONLINE CONTACT FORM, BY POST OR VIA SOCIAL MEDIA, SUCH AS WHEN YOU CONTACT US TO MAKE AN ENQUIRY OR GIVE US FEEDBACK;
- BECOME A PARTNER OR SUPPLIER OF OURS; OR
- APPLY FOR A POSITION WITH US (INCLUDING FOR WORK EXPERIENCE).

YOUR PERSONAL INFORMATION THAT IS COLLECTED BY ONE GURNER™ GROUP ENTITY WILL BE SHARED WITH ALL ENTITIES WITHIN THE GURNER™ GROUP AND BY PROVIDING US WITH YOUR PERSONAL INFORMATION YOU CONSENT TO YOUR PERSONAL INFORMATION BEING USED IN THIS WAY.

WE MAY ALSO COLLECT PERSONAL INFORMATION FROM GOVERNMENT BODIES, AND ENFORCEMENT AND REGULATORY AUTHORITIES.

SUMMARY OF PERSONAL INFORMATION WE COLLECT AND HOW WE COLLECT THIS INFORMATION

Type of personal information	What this includes	How do we collect this information?
Personal information, contact and demographic details	<p>This may include your:</p> <ul style="list-style-type: none"> • full name; • date of birth; • address; • email address; • phone number; • gender; and • place of residence (nationality code). <p>If you are a job applicant, this may also include contact details for your emergency contact.</p>	<p>We may collect this information:</p> <ul style="list-style-type: none"> • when you make purchases (in person or electronically); • when you create an account with us, in person or online; • directly from you during your conversations with our staff members (in person, via phone or online including when making reservations with us); • when you communicate with us during events and promotional activities; • when you fill in a contact form at one of our display suites. • when you contact us via our online contact form, by post, or via our social media channels; • if you apply for a position at GURNER™ Group; • when you apply to be a GURNER™ Wellness Group member; • when you create a profile on and use our App (including to book classes at our GURNER™ Wellness Group clubs); • when you otherwise interact with us on a commercial basis; or • from publicly available information.
Payment information	<p>This includes your full credit card details.</p>	<p>We will collect your full credit card details when you make a payment. Payments are processed by a secure third party provider. We only store the last four digits of your credit card number, together with the expiry date and cardholder name.</p>
Information about your purchases	<p>GURNER™ Group developments</p> <p>- we may collect information about:</p> <ul style="list-style-type: none"> • the property that you are interested in or have agreed 	<p>We will collect information if you have expressed an interest in or have agreed to purchase a property at one of our developments or when you complete a purchase for our products, or when you</p>

	<p>to purchase (such price ranges, as the location and size of the property and the design and specifications of the apartment);</p> <ul style="list-style-type: none"> • what prompted you to inspect the project; • how you heard about us; • details of price points and apartment types you are interested in (e.g. one bedroom or two bedroom); • whether you are an owner-occupier or investor; • your passport or driver's licence (to verify your identity); • whether you are an Australian resident; • the terms of your contract (including price), payment details, information relating to your financing arrangements (such as your tax file number, bank details and how much money you are borrowing) and contact details for your authorised representatives (such as your lawyer). 	<p>provide your account information to make an in-store purchase.</p>
Information about your goods and services	<p>This may include your:</p> <ul style="list-style-type: none"> • full name; • address; • email address; • phone number; • details about the goods or services you supply; and • payment details. 	<p>We may collect this information when you supply goods and services to us.</p>
Workplace information	<p>This may include:</p> <ul style="list-style-type: none"> • information relating to your work history; • information about your education and qualifications; • your working eligibility rights; • your suitability for the role you are applying for; and • details about your referees. 	<p>We may collect this information if you apply for a position at GURNER™ Group (including if you are applying for work experience with us).</p>
Information collected during our interactions	<p>This includes details of your interactions with us. We may collect:</p>	<p>We may collect this information:</p> <ul style="list-style-type: none"> • when you interact with us generally; • when you visit one of our hospitality venues;

	<ul style="list-style-type: none"> • your name and contact details; • details of your enquiry or feedback; • how you heard about us; • information about our response and details of your responses to the research questions you answer; and • information you provide when submitting your entry. 	<ul style="list-style-type: none"> • when you visit one of our GURNER™ Wellness Group clubs; • when we communicate with you; • when you use our online services (such as our websites or our social media channels); • when you make an enquiry, provide feedback, or make a complaint (via the online contact form, in person or by post); • when you participate in market research conducted by us or on our behalf; • in your responses to customer satisfaction, service development, quality control, research surveys and similar activities; • when you enter into any promotions, competitions or special offers.
Online and digital services information (including behavioural information)	We may collect information from you electronically, which includes information such as your IP address, and details about your device.	We may collect this information when you use our website, via use of online behavioural technologies such as cookies. Please see section 2.3 for further information on the digital information we collect.
Camera surveillance information	We may collect camera surveillance information which includes photographs or video recordings of you.	We may collect this information in circumstances where we use camera surveillance (e.g. CCTV) at our stores or GURNER™ Wellness Group clubs for the safety of our staff and customers.
Information required to be collected by law	We may collect information as required by law which may include your name, your usual residential address, residency status and passport details.	We may collect information that is required to be collected by law. We may collect other information as required.
Publicly available online information	We may collect information that is publicly available online, such as on online forums, websites, and social media channels (for example, information that relates to a complaint).	We may collect this directly from the publicly available source (e.g. on the online forum, website, or social media channel). We may also collect anonymous answers to surveys or aggregated information about how users use our website.

WE ALSO COLLECT ANY ADDITIONAL PERSONAL INFORMATION YOU PROVIDE TO US, OR AUTHORISE US TO COLLECT, AS PART OF YOUR INTERACTION WITH THE GURNER™ GROUP. OTHER INFORMATION MAY BE COLLECTED FROM OTHER SOURCES BUT THOSE SOURCES SHOULD PROVIDE YOU WITH DETAILS OF WHAT PERSONAL INFORMATION IS BEING COLLECTED AND WHY.

WE MAY ALSO COLLECT PERSONAL INFORMATION FROM THIRD PARTIES (SUCH AS THROUGH ACQUISITION OF THIRD-PARTY MAILING LISTS AND FROM

ORGANISATIONS WITH WHOM WE HAVE AN AFFILIATION), TO IMPROVE THE PERSONALISATION OF OUR OFFERINGS FOR YOU.

THE PERSONAL INFORMATION COLLECTED MAY VARY DEPENDING ON YOUR PARTICULAR INTERACTION WITH US BUT WILL BE LIMITED TO THAT INFORMATION NECESSARY TO RECORD AND MANAGE OUR INTERACTION WITH YOU (AND THAT INFORMATION REQUIRED TO ENABLE YOU TO PARTICIPATE IN OUR SERVICES AND OTHER PRODUCTS BEING OFFERED BY GURNER™ GROUP.

IN SOME CASES YOU MAY PROVIDE US WITH PERSONAL INFORMATION WHICH RELATES TO ANOTHER PERSON (FOR EXAMPLE, AN EMERGENCY CONTACT, OR YOU MAKE A RESERVATION ON BEHALF OF ANOTHER PERSON) IF YOU DO SO, YOU AGREE THAT YOU HAVE RECEIVED PERMISSION FROM THESE INDIVIDUALS FOR US TO COLLECT, USE, AND SHARE, THEIR PERSONAL INFORMATION IN ACCORDANCE WITH THIS PRIVACY POLICY. YOU SHOULD ALSO LET THEM KNOW ABOUT OUR PRIVACY POLICY (INCLUDING THE INFORMATION IN THIS PRIVACY POLICY).

2.2 SENSITIVE INFORMATION

SENSITIVE INFORMATION IS A SUBSET OF PERSONAL INFORMATION THAT IS GENERALLY AFFORDED A HIGHER LEVEL OF PRIVACY PROTECTION. SENSITIVE INFORMATION IS INFORMATION OR AN OPINION ABOUT AN INDIVIDUAL'S RACIAL OR ETHNIC ORIGIN, POLITICAL OPINIONS, MEMBERSHIP OF A POLITICAL ASSOCIATION, RELIGIOUS BELIEFS OR AFFILIATIONS, PHILOSOPHICAL BELIEFS, MEMBERSHIP OF A PROFESSIONAL OR TRADE ASSOCIATION OR TRADE UNION, SEXUAL PREFERENCES OR PRACTICES OR CRIMINAL RECORD. WE ONLY COLLECT SENSITIVE INFORMATION WHERE IT IS REASONABLY NECESSARY FOR OUR FUNCTIONS OR ACTIVITIES AND EITHER:

- THE INDIVIDUAL HAS CONSENTED; OR
- WE ARE REQUIRED OR AUTHORISED BY OR UNDER LAW TO DO SO.

FOR EXAMPLE, IF YOU PURCHASE A PROPERTY FROM US, WE WILL COLLECT INFORMATION ABOUT YOUR RESIDENCY STATUS, WHICH MAY INDICATE YOUR RACIAL OR ETHNIC ORIGIN.

2.3 HEALTH INFORMATION

HEALTH INFORMATION IS PROTECTED BY THE HR ACT. THE TERM 'HEALTH INFORMATION' HAS THE MEANING GIVEN TO IT IN THE HR ACT. IN GENERAL TERMS, HEALTH INFORMATION IS INFORMATION OR AN OPINION ABOUT THE PHYSICAL, MENTAL OR PSYCHOLOGICAL HEALTH, OR A DISABILITY OF AN INDIVIDUAL; INFORMATION ABOUT THE PROVISION OF HEALTH SERVICES TO AN INDIVIDUAL; PERSONAL INFORMATION COLLECTED TO PROVIDE A HEALTH SERVICE AND GENETIC INFORMATION.

WE ONLY COLLECT HEALTH INFORMATION WHERE IT IS REASONABLY NECESSARY FOR OUR FUNCTIONS OR ACTIVITIES AND EITHER:

- THE INDIVIDUAL HAS CONSENTED; OR
- WE ARE REQUIRED OR AUTHORISED BY OR UNDER LAW TO DO SO.

FOR EXAMPLE, IF YOU LINK YOUR OURA RING OR WHOOP BAND TO OUR APP.

2.4 COLLECTION OF INFORMATION OTHER THAN PERSONAL INFORMATION THROUGH OUR WEBSITE

WHEN YOU VISIT OUR WEBSITE, SOME OF THE INFORMATION THAT IS COLLECTED ABOUT YOUR VISIT IS NOT PERSONAL INFORMATION, AS IT DOES NOT REVEAL YOUR IDENTITY.

SITE VISIT INFORMATION

FOR EXAMPLE, WE RECORD YOUR SERVER ADDRESS, THE DATE AND TIME OF YOUR VISIT, THE PAGES YOU VISITED, ANY DOCUMENTS YOU DOWNLOADED, THE PREVIOUS SITE YOU VISITED AND THE TYPE OF DEVICE, BROWSER AND OPERATING SYSTEM YOU USED.

WE USE AND DISCLOSE THIS INFORMATION IN ANONYMOUS, AGGREGATED FORM ONLY, FOR PURPOSES INCLUDING STATISTICAL ANALYSIS AND TO ASSIST US TO IMPROVE THE FUNCTIONALITY AND USABILITY OF OUR WEBSITE. YOU ARE NOT INDIVIDUALLY IDENTIFIED, HOWEVER WE RESERVE THE RIGHT TO USE OR DISCLOSE THIS INFORMATION TO TRY TO LOCATE AN INDIVIDUAL WHERE WE REASONABLY BELIEVE THAT THE INDIVIDUAL MAY HAVE ENGAGED IN ANY UNLAWFUL OR INAPPROPRIATE ACTIVITY IN CONNECTION WITH OUR WEBSITE, OR WHERE WE ARE OTHERWISE REQUIRED OR AUTHORISED BY LAW TO DO SO.

COOKIES

A COOKIE IS A SMALL STRING OF INFORMATION THAT A WEBSITE TRANSFERS TO YOUR BROWSER FOR IDENTIFICATION PURPOSES. THE COOKIES WE USE DO NOT IDENTIFY INDIVIDUAL USERS, ALTHOUGH THEY DO IDENTIFY THE USER'S INTERNET BROWSER.

WE USE COOKIES TO HOLD ANONYMOUS SESSION INFORMATION. THIS INFORMATION IS USED TO PERSONALISE YOUR CURRENT VISIT TO THE WEBSITE, FOR EXAMPLE TO ALLOW THE WEBSITE TO REMEMBER WHO YOU ARE BY KEEPING SERVER VARIABLES LINKED TO YOUR SESSION.

WE ONLY USE NON-PERSISTENT COOKIES. THAT IS, THEY ARE HELD ON YOUR BROWSER'S MEMORY ONLY FOR THE DURATION OF YOUR SESSION.

MOST INTERNET BROWSERS ARE SET TO ACCEPT COOKIES. IF YOU PREFER NOT TO RECEIVE THEM, YOU CAN ADJUST YOUR INTERNET BROWSER TO REJECT

COOKIES, OR TO NOTIFY YOU WHEN THEY ARE BEING USED. THERE ARE ALSO SOFTWARE PRODUCTS AVAILABLE THAT CAN MANAGE COOKIES FOR YOU. REJECTING COOKIES CAN, HOWEVER, LIMIT THE FUNCTIONALITY OF OUR WEBSITE.

ONLINE BEHAVIOURAL ADVERTISING

WE USE ADVERTISING PROGRAMS THAT PLACE COOKIES ON YOUR COMPUTER TO COLLECT INFORMATION ABOUT YOUR BROWSING HISTORY (INCLUDING ON EXTERNAL WEBSITES). THIS INFORMATION, WHICH DOES NOT IDENTIFY YOU PERSONALLY, IS COLLECTED IN ORDER TO IMPROVE YOUR ONLINE EXPERIENCE BY CUSTOMISING THE ADVERTISING YOU SEE TO YOUR INTERESTS (INCLUDING THE DISPLAY OF MORE RELEVANT ADS ON EXTERNAL WEBSITES). YOU CAN OPT OUT OF THESE PROGRAMS BY TURNING OFF THE COOKIE SETTING IN YOUR OWN INTERNET BROWSER.

2.5 WHAT IF YOU DON'T PROVIDE US WITH YOUR PERSONAL INFORMATION?

WE WILL PROVIDE INDIVIDUALS WITH THE OPTION OF NOT IDENTIFYING THEMSELVES, OR OF USING A PSEUDONYM, WHEN DEALING WITH US IF IT IS LAWFUL AND PRACTICABLE TO DO SO. A PSEUDONYM IS A NAME OR OTHER DESCRIPTOR THAT IS DIFFERENT TO AN INDIVIDUAL'S ACTUAL NAME.

FOR EXAMPLE, YOU CAN ACCESS OUR WEBSITE AND MAKE GENERAL PHONE QUERIES WITHOUT HAVING TO IDENTIFY YOURSELF.

IN SOME CASES HOWEVER, IF YOU DON'T PROVIDE US WITH YOUR PERSONAL INFORMATION WHEN REQUESTED, WE MAY NOT BE ABLE TO PROVIDE YOU WITH THE PRODUCT OR SERVICE THAT YOU ARE SEEKING. FOR EXAMPLE, YOU MUST IDENTIFY YOURSELF TO A MEMBER OF OUR ACCOUNTS TEAM IN ORDER TO CHECK ON THE STATUS OF A PAYMENT MADE TO OR BY US.

3. HOW WE COLLECT PERSONAL INFORMATION

3.1 METHODS OF COLLECTION

WE MAY COLLECT PERSONAL INFORMATION IN A NUMBER OF WAYS, INCLUDING:

- DIRECTLY FROM YOU IN PERSON (FOR EXAMPLE, VISITS TO OUR HEAD OFFICE, GURNER™ WELLNESS GROUP CLUBS OR PROPERTIES WE ARE DEVELOPING, AT EVENTS OR AT CONFERENCES)
- THROUGH OUR WEBSITE (FOR EXAMPLE THROUGH OUR 'ENQUIRIES' FORM)
- VIA OUR APP
- THROUGH OUR META, FACEBOOK, LINKEDIN AND WECHAT PAGES

- OVER THE TELEPHONE
- THROUGH WRITTEN CORRESPONDENCE (SUCH AS LETTERS, FAXES AND EMAILS)
- DURING CONVERSATIONS BETWEEN YOU AND OUR REPRESENTATIVES
- BY CONTRACTING WITH US
- ON HARD COPY FORMS (FOR EXAMPLE, ENQUIRY FORMS AND SURVEYS)
- THROUGH SURVEILLANCE CAMERAS AT OUR CORPORATE PREMISES, GURNER™ WELLNESS GROUP CLUBS AND ON SOME OF OUR DISPLAY SUITES OR DEVELOPMENT SITES
- FROM THIRD PARTIES, INCLUDING:
 - YOUR REPRESENTATIVES, INCLUDING YOUR LAWYERS, ACCOUNTANTS, FINANCIERS AND OTHER AUTHORISED AGENTS AND ADVISERS
 - YOUR EMPLOYER
 - OURA HEALTH OR WHOOP TO PROVIDE HEALTH AND WELLNESS RECOMMENDATIONS VIA OUR APP BASED ON YOUR OURA RING READINESS SCORE OR WHOOP BAND INFORMATION. THIS DATA IS ONLY STORED FOR 24 HOURS ON A SECURE SERVER;
 - CREDIT REPORTING AGENCIES, LAW ENFORCEMENT AGENCIES AND GOVERNMENT ENTITIES
 - THE LAND TITLES OFFICE
 - RELEVANT STATE AND TERRITORY VALUERS GENERAL
 - REAL ESTATE AGENTS
 - AUSTRALIAN SECURITIES AND INVESTMENT COMMISSION
 - MORTGAGE BROKERS AND/OR FINANCIAL SERVICE PROVIDERS
 - PUBLICLY AVAILABLE SOURCES OF INFORMATION OR ANY OTHER ORGANISATIONS WHERE YOU HAVE GIVEN YOUR CONSENT.

3.2 COLLECTION NOTICES

WHERE WE COLLECT PERSONAL INFORMATION ABOUT YOU, WE WILL TAKE REASONABLE STEPS TO PROVIDE YOU WITH CERTAIN DETAILS ABOUT THAT COLLECTION (SUCH AS THE PURPOSE FOR WHICH WE ARE COLLECTING THE INFORMATION AND THE TYPE OF THIRD PARTIES TO WHICH IT IS USUALLY DISCLOSED). WE WILL GENERALLY INCLUDE THIS INFORMATION IN A COLLECTION NOTICE.

COLLECTION NOTICES PROVIDE MORE SPECIFIC INFORMATION THAN THIS PRIVACY POLICY. THE TERMS OF THIS PRIVACY POLICY ARE SUBJECT TO ANY SPECIFIC PROVISIONS CONTAINED IN COLLECTION NOTICES AND IN THE TERMS AND CONDITIONS OF PARTICULAR OFFERS, PRODUCTS AND SERVICES. WE ENCOURAGE YOU TO READ THOSE PROVISIONS CAREFULLY.

3.3 UNSOLICITED INFORMATION

UNSOLICITED PERSONAL INFORMATION IS PERSONAL INFORMATION WE RECEIVE THAT WE HAVE TAKEN NO ACTIVE STEPS TO COLLECT (SUCH AS AN EMPLOYMENT APPLICATION SENT TO US BY AN INDIVIDUAL ON THEIR OWN INITIATIVE, RATHER THAN IN RESPONSE TO A JOB ADVERTISEMENT).

WE MAY KEEP RECORDS OF UNSOLICITED PERSONAL INFORMATION IF THE PRIVACY ACT PERMITS IT (FOR EXAMPLE, IF THE INFORMATION IS REASONABLY NECESSARY FOR ONE OR MORE OF OUR FUNCTIONS OR ACTIVITIES). IF NOT, WE WILL DESTROY OR DE-IDENTIFY THE INFORMATION AS SOON AS PRACTICABLE, PROVIDED IT IS LAWFUL AND REASONABLE TO DO SO.

4. WHAT HAPPENS IF WE CAN'T COLLECT YOUR PERSONAL INFORMATION FROM YOU?

IF YOU DO NOT PROVIDE US WITH THE PERSONAL INFORMATION DESCRIBED ABOVE, SOME OR ALL OF THE FOLLOWING MAY HAPPEN:

- WE MAY NOT BE ABLE TO PROVIDE THE REQUESTED PRODUCTS OR SERVICES TO YOU, EITHER TO THE SAME STANDARD OR AT ALL;
- WE MAY NOT BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT PRODUCTS AND SERVICES THAT YOU MAY WANT; OR
- WE MAY BE UNABLE TO TAILOR THE CONTENT OF OUR WEBSITES TO YOUR PREFERENCES AND YOUR EXPERIENCE OF OUR WEBSITES MAY NOT BE AS ENJOYABLE OR USEFUL.

5. WHY WE COLLECT PERSONAL INFORMATION

5.1 GENERAL

WE COLLECT PERSONAL INFORMATION ABOUT YOU SO THAT WE CAN PERFORM OUR BUSINESS ACTIVITIES AND FUNCTIONS AND TO PROVIDE BEST POSSIBLE QUALITY OF CUSTOMER SERVICE.

We may use your personal information for purposes which are incidental to the sale and promotion of our products, or for other purposes which are within your reasonable expectation or permitted by law.

The purpose for which we usually collect, store, and use your personal information depends on how you interact with us (for example, whether you are a potential purchaser of one of our developments or a customer at our restaurants), but may include the following purposes:

Purpose	Explanation
To provide you with our products when you are a prospective or existing	We may collect, store and use your personal information to: <ul style="list-style-type: none">• describe our development products and services to prospective and existing purchasers;

<p>purchaser (GURNER™ Group developments only)</p>	<ul style="list-style-type: none"> • designing, engineering, constructing and delivering our developments; • to update our records and keep your contact details up to date and to assist you with enquiries, resolving complaints or to improve our customer service; • to verify your identity and conduct credit checks; • to carry out our obligations arising from any contracts entered into between you and us and to provide you with the products, services and information that you request from us; • completing sales transactions and assisting purchasers with the management of their apartment upon completion of a development; • obtaining products and services for our business; • obtaining finance for our developments; and • to process transactions for the sale or lease of land and/or houses/apartments and any applicable payments and for our billing and account purposes.
<p>To provide you with our products when you are a customer of our restaurants</p>	<p>We may collect, store and use your personal information to:</p> <ul style="list-style-type: none"> • verify your identity when you make a reservation; • send you SMS reminders about your reservation; • process your payment and any refund (credit card details are encrypted and transferred securely to our third party payment provider); • process any required refund; • administer, manage and communicate with you about existing products we are providing to you ; • manage our relationship with you, including any enquiries you may make; • improve our products and your experience with us; and • to process transactions and any applicable payments and for our billing and account purposes.
<p>To provide you with our services when you are a prospective or existing GURNER™ Wellness Group club member or guest</p>	<p>We may collect, store and use your personal information to:</p> <ul style="list-style-type: none"> • process and manage your membership; • provide you access to our facilities, services and App; • outline our products and services to prospective and existing members; • to update our records and keep your contact details up to data and to assist you with enquiries, resolving complaints or to improve customer service; • to verify your identity; and • provide you with the products, services and information you request from us.
<p>To promote our products and services to you</p>	<p>Where you have opted in to receive promotional offers, we may collect, store and use your personal information to promote products and services to you that we think you may be interested in, including through direct marketing, events and competitions. You can find further details on this at section 11.</p>
<p>To manage your working relationship with us (including when you are a contractor)</p>	<p>We may collect, store and use your personal information to assess your suitability for a position with us, and, if you successfully join us, to manage your working relationship with us.</p> <p>We may collect, store and use your personal information for administration and management purposes (including if you are a contractor).</p>
<p>To do business with you</p>	<p>We may collect, store and use your personal information if you interact with us on a commercial basis (such as if you are a service provider, contractor, supplier or partner), or if you otherwise interact with us on a commercial basis. We may also collect, store and use your personal information to carry out our</p>

	<p>obligations arising from any contracts entered into between you and us and to provide you with the products, services and information that you request from us</p>
<p>To manage and improve our operations and business</p>	<p>We may collect, store and use your personal information to:</p> <ul style="list-style-type: none"> • to provide you with access to protected areas of our website and our App; • to assess the performance of the website and to improve the operation of the website and App; • to conduct business processing functions including providing personal information to our related bodies corporate, contractors, service providers or other third parties; • manage fees and administer billing (including administration of third-party payment arrangements) and debt recovery; • manage, monitor, plan and evaluate our products, including by undertaking market research; • conduct safety and quality assurance and improvement activities, including quality control of our products and communications with you; • train and recruit staff and contractors; • protecting the security of our offices, staff, customers and the property held on our premises; • performing research and statistical analysis, including for customer satisfaction and service improvement purposes; • obtain products and services for our business; • test and maintain information technology systems; • investigate any incidents that may occur (both in relation to cyber security, as well as any health and safety incidents that occur at our premises); • handle and respond to any complaints made; • test the effectiveness and customer satisfaction of our products, improve the way we provide products to you, and for other compliance purposes; and/or • to administer our website and App and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.
<p>To create de-identified or aggregate data for data analytics activities</p>	<p>We may collect, store and use your personal information to create de-identified or aggregate data sets (which is no longer personal information). We do this by de-identifying or aggregating your information such as combining your information with information we have about our other customers, for example purchasing information, and with data we obtain from other sources. We use this de-identified or aggregate data to assist with our business decisions, such as to:</p> <ul style="list-style-type: none"> • help us in understanding trends in customer behaviour (such as the success of our products and our different marketing campaigns (such as promotions)); • create look-a-like audiences for the purposes of providing targeted advertising to other customers; • improve the products we offer; and • develop new products that better meet our customers' preferences and behaviours. <p>We also collect the nationality code of our customers and provide this in anonymised and aggregated format to Sydney Airport Corporation Limited for statistical purposes.</p>

To assist with any business, share sale or corporate restructure	We may collect, store and use your personal information for the purpose of facilitating or implementing a transfer or sale of all or part of our assets or business or if we undergo any other kind of corporate restructure, acquisition or sale.
Other purposes	We may collect, store and use your personal information for any other purpose that you have provided your express or implied consent to.

WE MAY ALSO COLLECT, HOLD, USE AND DISCLOSE PERSONAL INFORMATION FOR OTHER PURPOSES EXPLAINED AT THE TIME OF COLLECTION OR:

- WHICH ARE REQUIRED OR AUTHORISED BY LAW; OR
- FOR WHICH YOU HAVE PROVIDED YOUR CONSENT.

YOUR PERSONAL INFORMATION AND HEALTH INFORMATION WILL NOT BE SHARED, SOLD, RENTED OR DISCLOSED OTHER THAN AS DESCRIBED IN THIS PRIVACY POLICY.

5.2 DIRECT MARKETING

WE MAY USE OR DISCLOSE YOUR PERSONAL INFORMATION TO LET YOU KNOW ABOUT US AND OUR PRODUCTS AND SERVICES (INCLUDING PROMOTIONS, SPECIAL OFFERS AND EVENTS), EITHER WHERE WE HAVE YOUR EXPRESS OR IMPLIED CONSENT, OR WHERE WE ARE OTHERWISE PERMITTED BY LAW TO DO SO. WE MAY CONTACT YOU FOR THESE PURPOSES IN A VARIETY OF WAYS, INCLUDING BY MAIL, EMAIL, SMS, TELEPHONE, AND ONLINE ADVERTISING.

OPTING OUT

WHERE YOU HAVE CONSENTED TO RECEIVING MARKETING COMMUNICATIONS FROM US, YOUR CONSENT WILL REMAIN CURRENT UNTIL YOU ADVISE US OTHERWISE. HOWEVER, YOU CAN OPT OUT AT ANY TIME, BY:

- CONTACTING US (DETAILS UNDER HEADING 15 BELOW)
- ADVISING US IF YOU RECEIVE A MARKETING CALL THAT YOU NO LONGER WISH TO RECEIVE THESE CALLS
- USING THE UNSUBSCRIBE FACILITY THAT WE INCLUDE IN OUR ELECTRONIC MESSAGES (SUCH AS EMAILS, SMS AND MMS)

ONCE YOU DO THIS, WE WILL UPDATE YOUR PROFILE TO ENSURE THAT YOU DON'T RECEIVE FURTHER MARKETING MESSAGES. STOPPING MARKETING MESSAGES WILL NOT STOP SERVICE COMMUNICATIONS (SUCH AS CONTRACT UPDATES).

THIRD-PARTY MARKETING

WE WILL GET YOUR EXPRESS OPT-IN CONSENT BEFORE WE SHARE YOUR PERSONAL DATA WITH ANY COMPANY OUTSIDE THE GURNER™ GROUP FOR MARKETING PURPOSES.

6. WHO WE MAY SHARE YOUR PERSONAL INFORMATION WITH

WE WILL SHARE YOUR PERSONAL INFORMATION WITH OTHER MEMBERS OF THE GURNER™ GROUP AND IN PROVIDING US WITH YOUR PERSONAL INFORMATION YOU CONSENT TO US DOING SO.

WE MAY SHARE PERSONAL INFORMATION WITH THIRD PARTIES WHERE APPROPRIATE FOR THE REASONS FOR WHICH WE COLLECT, STORE AND USE THAT INFORMATION (SEE ABOVE) AND FOR THE PURPOSES SET OUT UNDER HEADING 5, INCLUDING:

- OUR PARTNERS, SUPPLIERS AND ENTITIES WE DO BUSINESS WITH (WHO ASSIST US WITH PROVIDING OUR PRODUCTS AND SERVICES), SUCH AS LAND VENDORS, SUB-CONTRACTORS, SUPPLIERS OF FIXTURES AND FITTINGS, REAL ESTATE AGENTS, FINANCIERS AND PROSPECTIVE FINANCIERS, FINANCIAL INSTITUTIONS FOR PAYMENT PROCESSING, MORTGAGE BROKER, FINANCIAL PLANNERS, BANKS AND GUEST BOOKING AND RESERVATION PLATFORMS.
- THIRD PARTIES, WHETHER AFFILIATED OR UNAFFILIATED, FOR THE PURPOSE OF FACILITATING OR IMPLEMENTING A TRANSFER OR SALE OF PROPERTY OR ALL OR PART OF OUR ASSETS OR BUSINESS OR IF WE UNDERGO ANY OTHER KIND OF CORPORATE RESTRUCTURE, ACQUISITION OR SALE. IN THIS CONTEXT, YOUR PERSONAL INFORMATION MAY BE TRANSFERRED TO ANOTHER ENTITY (OR IF SUCH A SALE, TRANSFER, ACQUISITION OR CORPORATE RESTRUCTURE IS BEING CONTEMPLATED BY US);
- GOVERNMENT AND LAW ENFORCEMENT AGENCIES (INCLUDING REGULATORY BODIES) TO COMPLY WITH OUR LEGISLATIVE OR REGULATORY OBLIGATIONS, INCLUDING THE LAND TITLES OFFICE, RELEVANT STATE AND TERRITORY VALUERS GENERAL, AUSTRALIAN SECURITIES AND INVESTMENT COMMISSION;
- AN INDIVIDUAL'S AGENT OR AUTHORISED REPRESENTATIVE;
- REFEREES WHOSE DETAILS ARE PROVIDED TO US BY JOB APPLICANTS;
- OWNERS CORPORATION MANAGERS AND MANAGING / LETTING AGENTS; AND
- OUR CONTRACTED SERVICE PROVIDERS AND ADVISORS (WHO ASSIST US WITH PROVIDING, PROMOTING AND MANAGING OUR PRODUCTS AND SERVICES), INCLUDING:
 - SUPPLIERS OF BUILDING MATERIALS AND FITTINGS
 - DELIVERY AND SHIPPING PROVIDERS
 - INFORMATION TECHNOLOGY AND DATA STORAGE PROVIDERS

- VENUES AND EVENT ORGANISERS
- RECREATIONAL, RECOVERY AND SPA SERVICE PROVIDERS
- FITNESS INSTRUCTORS
- MARKETING AND COMMUNICATIONS AGENCIES
- RESEARCH AND STATISTICAL ANALYSIS PROVIDERS
- CALL CENTRES
- MAIL HOUSES
- EXTERNAL BUSINESS ADVISERS (SUCH AS CONSULTANTS, RECRUITMENT ADVISORS, ACCOUNTANTS, AUDITORS AND LAWYERS).

IN EACH CASE, WE MAY DISCLOSE PERSONAL INFORMATION TO THE SERVICE PROVIDER AND THE SERVICE PROVIDER MAY IN TURN PROVIDE US WITH PERSONAL INFORMATION COLLECTED FROM YOU IN THE COURSE OF PROVIDING THE RELEVANT PRODUCTS OR SERVICES.

WE MAY ALSO DISCLOSE INFORMATION FOR OTHER PURPOSES EXPLAINED AT THE TIME WE COLLECT YOUR PERSONAL INFORMATION, TO PROVIDE OUR PRODUCTS AND SERVICES, WHERE WE ARE OTHERWISE ALLOWED OR REQUIRED TO DO SO UNDER LAW OR TO RESPOND TO LEGAL REQUIREMENTS, ENFORCE OUR POLICIES, AND PROTECT OUR RIGHTS AND PROPERTY.

7. CROSS BORDER DISCLOSURE OF PERSONAL INFORMATION

WE GENERALLY ONLY COLLECT PERSONAL INFORMATION IN AUSTRALIA.

WE ONLY EVER SHARE YOUR PERSONAL INFORMATION OUTSIDE AUSTRALIA WHERE WE ARE PERMITTED TO DO SO UNDER THE PRIVACY ACT. GENERALLY, THIS MEANS WE WILL TAKE REASONABLE STEPS TO ENSURE YOUR PERSONAL INFORMATION IS TREATED SECURELY AND IN ACCORDANCE WITH THE REQUIREMENTS OF THE PRIVACY ACT.

THERE ARE OTHER CIRCUMSTANCES WHERE WE MAY SHARE YOUR PERSONAL INFORMATION TO AN OVERSEAS RECIPIENT. FOR EXAMPLE, WHERE YOU HAVE PROVIDED YOUR CONSENT, OR WE ARE OTHERWISE PERMITTED TO DO SO UNDER THE PRIVACY ACT OR OTHER RELEVANT LAWS.

8. USE OF GOVERNMENT RELATED IDENTIFIERS

WE WILL NOT:

- USE A GOVERNMENT RELATED IDENTIFIER OF AN INDIVIDUAL (SUCH AS A MEDICARE NUMBER OR DRIVER'S LICENCE NUMBER) AS OUR OWN IDENTIFIER OF INDIVIDUALS; OR
- OTHERWISE USE OR DISCLOSE SUCH A GOVERNMENT RELATED IDENTIFIER, UNLESS THIS IS PERMITTED BY THE PRIVACY ACT (FOR EXAMPLE, USE OF AN IDENTIFIER TO VERIFY AN INDIVIDUAL'S IDENTITY OR USES OR DISCLOSURES REQUIRED OR AUTHORISED BY OR UNDER AN AUSTRALIAN LAW).

9. DATA QUALITY AND SECURITY

9.1 GENERAL

WE HOLD PERSONAL INFORMATION IN A NUMBER OF WAYS, INCLUDING IN ELECTRONIC DATABASES, EMAIL CONTACT LISTS, AND IN PAPER DOCUMENTS HELD IN DRAWERS AND CABINETS. PAPER FILES MAY ALSO BE ARCHIVED IN BOXES AND STORED OFFSITE IN SECURE FACILITIES. WE TAKE REASONABLE STEPS TO:

- MAKE SURE THAT THE PERSONAL INFORMATION THAT WE COLLECT, USE AND DISCLOSE IS ACCURATE, UP TO DATE AND COMPLETE AND (IN THE CASE OF USE AND DISCLOSURE) RELEVANT;
- STORE THE PERSONAL INFORMATION THAT WE HOLD IN A SECURE ENVIRONMENT PROTECTED FROM MISUSE, INTERFERENCE AND LOSS AND FROM UNAUTHORISED ACCESS, MODIFICATION OR DISCLOSURE; AND
- DESTROY OR PERMANENTLY DE-IDENTIFY PERSONAL INFORMATION THAT IS NO LONGER NEEDED FOR ANY PURPOSE PERMITTED BY THE APPS.

YOU CAN HELP US KEEP YOUR INFORMATION UP TO DATE, BY LETTING US KNOW ABOUT ANY CHANGES TO YOUR DETAILS, SUCH AS YOUR ADDRESS, EMAIL ADDRESS OR PHONE NUMBER.

WITHIN THE GURNERTM GROUP, ACCESS TO PERSONAL INFORMATION IS RESTRICTED TO PERSONNEL ON A NEED TO KNOW BASIS. GURNERTM HAS DIRECTED ITS STAFF THAT PERSONAL INFORMATION MUST BE DEALT WITH IN ACCORDANCE WITH THIS PRIVACY POLICY AND KEPT SECURE FROM UNAUTHORISED ACCESS OR DISCLOSURE. WE EDUCATE OUR STAFF ABOUT THEIR DUTY TO PROTECT YOUR PRIVACY AND PROVIDE TRAINING REGARDING THIS PRIVACY POLICY.

9.2 SECURITY

THE STEPS WE TAKE TO SECURE THE PERSONAL INFORMATION WE HOLD INCLUDE WEBSITE PROTECTION MEASURES (SUCH AS FIREWALLS AND ANTI-VIRUS SOFTWARE), SECURITY RESTRICTIONS ON ACCESS TO OUR COMPUTER SYSTEMS (SUCH AS LOGIN AND PASSWORD PROTECTION), CONTROLLED ACCESS TO OUR CORPORATE PREMISES, POLICIES ON DOCUMENT STORAGE AND SECURITY, PERSONNEL SECURITY (INCLUDING RESTRICTING ACCESS TO PERSONAL INFORMATION ON OUR SYSTEMS TO STAFF WHO NEED THAT ACCESS TO CARRY OUT THEIR DUTIES, STAFF TRAINING AND WORKPLACE POLICIES.

ONLINE CREDIT CARD PAYMENT SECURITY

WE PROCESS PAYMENTS USING EFTPOS AND ONLINE TECHNOLOGIES. ALL TRANSACTIONS PROCESSED BY US MEET INDUSTRY SECURITY STANDARDS TO ENSURE PAYMENT DETAILS ARE PROTECTED.

WEBSITE SECURITY

WHILE WE ENDEAVOUR TO PROTECT THE PERSONAL INFORMATION AND PRIVACY OF USERS OF OUR WEBSITE, WE CANNOT GUARANTEE THE SECURITY OF ANY INFORMATION THAT YOU DISCLOSE ONLINE AND YOU DISCLOSE THAT INFORMATION AT YOUR OWN RISK. IF YOU ARE CONCERNED ABOUT SENDING YOUR INFORMATION OVER THE INTERNET, YOU CAN CONTACT US BY TELEPHONE OR POST (DETAILS UNDER HEADING 15 BELOW).

IF YOU ARE A REGISTERED USER OF OUR WEBSITE, YOU CAN ALSO HELP TO PROTECT THE PRIVACY OF YOUR PERSONAL INFORMATION BY MAINTAINING THE CONFIDENTIALITY OF YOUR USERNAME AND PASSWORD AND BY ENSURING THAT YOU LOG OUT OF THE WEBSITE WHEN YOU HAVE FINISHED USING IT. IN ADDITION, IF YOU BECOME AWARE OF ANY SECURITY BREACH, PLEASE LET US KNOW AS SOON AS POSSIBLE.

IP ADDRESS

AN IP (INTERNET PROTOCOL) ADDRESS IS A NUMBER THAT IS AUTOMATICALLY ASSIGNED TO YOUR COMPUTER BY YOUR INTERNET SERVICE PROVIDER WHEN YOU LOG ON. YOUR IP ADDRESS IS NOT LINKED TO YOUR PERSONAL INFORMATION, BUT WE DO PRESERVE THE RIGHT TO USE IP ADDRESSES TO IDENTIFY INDIVIDUALS WHO MAY THREATEN OUR SITE, SERVICES OR CLIENTS. IP ADDRESSES MAY ALSO BE USED TO HELP DIAGNOSE PROBLEMS WITH OUR WEBSITE AND TO GATHER BROAD DEMOGRAPHIC INFORMATION.

THIRD PARTY WEBSITES

LINKS TO THIRD PARTY WEBSITES THAT ARE NOT OPERATED OR CONTROLLED BY US ARE PROVIDED FOR YOUR CONVENIENCE. WE ARE NOT RESPONSIBLE FOR THE PRIVACY OR SECURITY PRACTICES OF THOSE WEBSITES, WHICH ARE NOT COVERED BY THIS PRIVACY POLICY. THIRD PARTY WEBSITES SHOULD HAVE

THEIR OWN PRIVACY AND SECURITY POLICIES, WHICH WE ENCOURAGE YOU TO READ BEFORE SUPPLYING ANY PERSONAL INFORMATION TO THEM.

DATA BREACHES

IF THERE IS A BREACH OF YOUR PERSONAL INFORMATION, GURNER™ WILL DEAL WITH SUCH BREACH AND NOTIFY YOU IN ACCORDANCE WITH ITS OBLIGATIONS UNDER THE PRIVACY ACT AND HR ACT.

10. HOW LONG WE KEEP YOUR INFORMATION

WE WILL ONLY KEEP THE INFORMATION WE COLLECT ABOUT YOU FOR AS LONG AS REQUIRED FOR THE PURPOSES SET OUT ABOVE, OR AS REQUIRED TO COMPLY WITH ANY LEGAL OBLIGATIONS TO WHICH WE ARE SUBJECT.

IF YOU DECIDE NOT TO GO AHEAD WITH PURCHASING A PROPERTY FOR WHICH YOU HAVE REGISTERED, WE MAY STILL KEEP YOUR INFORMATION.

11. MAIL AND EMAIL INFORMATION

IF YOU WISH TO STOP RECEIVING ANY EMAILS OR OTHER COMMUNICATIONS FROM GURNER™ WHICH MAY BE SENT TO YOU IN THE FUTURE, OR IF YOU HAVE SUBMITTED PERSONAL INFORMATION OR HEALTH INFORMATION THROUGH THE WEBSITE AND WOULD LIKE TO HAVE THAT INFORMATION DELETED FROM OUR RECORDS, PLEASE NOTIFY US AT PRIVACY@GURNER.COM.AU.

GURNER™ WILL PRESERVE THE CONTENTS OF ANY EMAIL MESSAGE THAT YOU SEND IF WE BELIEVE THAT WE HAVE A LEGAL REQUIREMENT TO DO SO. EMAILS SENT TO OR FROM GURNER™ ARE ROUTINELY MONITORED FOR QUALITY CONTROL, SYSTEMS ADMINISTRATION AND LEGAL COMPLIANCE PURPOSES.

12. ACCESS AND CORRECTION

12.1 GENERAL

PLEASE CONTACT OUR PRIVACY OFFICER (DETAILS UNDER HEADING 15 BELOW) IF YOU WOULD LIKE TO ACCESS OR CORRECT THE PERSONAL INFORMATION THAT WE HOLD ABOUT YOU. WE MAY REQUIRE YOU TO VERIFY YOUR IDENTITY BEFORE PROCESSING ANY ACCESS OR CORRECTION REQUESTS, TO MAKE SURE THAT THE PERSONAL INFORMATION WE HOLD IS PROPERLY PROTECTED.

12.2 ACCESS

WE WILL GENERALLY PROVIDE YOU WITH ACCESS TO YOUR PERSONAL INFORMATION, SUBJECT TO SOME EXCEPTIONS PERMITTED BY LAW. WE WILL ALSO GENERALLY PROVIDE ACCESS IN THE MANNER THAT YOU HAVE

REQUESTED (EG BY PROVIDING PHOTOCOPIES OR ALLOWING A FILE TO BE VIEWED), PROVIDED IT IS REASONABLE AND PRACTICABLE FOR US TO DO SO. WE MAY HOWEVER CHARGE A FEE TO COVER OUR REASONABLE COSTS OF LOCATING THE INFORMATION AND PROVIDING IT TO YOU.

12.3 CORRECTION

IF YOU ASK US TO CORRECT PERSONAL INFORMATION THAT WE HOLD ABOUT YOU, OR IF WE ARE SATISFIED THAT THE PERSONAL INFORMATION WE HOLD IS NOT ACCURATE, COMPLETE AND UP TO DATE, WE WILL TAKE REASONABLE STEPS TO CORRECT THAT INFORMATION TO ENSURE THAT, HAVING REGARD TO THE PURPOSE FOR WHICH IT IS HELD, THE INFORMATION IS ACCURATE, UP-TO-DATE, COMPLETE, RELEVANT AND NOT MISLEADING.

IF WE CORRECT PERSONAL INFORMATION ABOUT YOU, AND WE HAVE PREVIOUSLY DISCLOSED THAT INFORMATION TO ANOTHER AGENCY OR ORGANISATION THAT IS SUBJECT TO THE PRIVACY ACT, YOU MAY ASK US TO NOTIFY THAT OTHER ENTITY. IF SO, WE WILL TAKE REASONABLE STEPS TO DO SO, UNLESS THIS WOULD BE IMPRACTICABLE OR UNLAWFUL.

12.4 TIMEFRAME FOR ACCESS AND CORRECTION REQUESTS

EXCEPT IN THE CASE OF MORE COMPLICATED REQUESTS, WE WILL ENDEAVOUR TO RESPOND TO ACCESS AND CORRECTION REQUESTS WITHIN 30 DAYS.

12.5 WHAT IF WE DO NOT AGREE TO YOUR REQUEST FOR ACCESS OR CORRECTION?

IF WE DO NOT AGREE TO YOUR ACCESS OR CORRECTION REQUEST, OR IF WE DO NOT AGREE TO GIVE YOU ACCESS IN THE MANNER REQUESTED, WE WILL PROVIDE YOU WITH A WRITTEN NOTICE SETTING OUT:

- THE REASONS FOR OUR DECISION (EXCEPT TO THE EXTENT THAT, HAVING REGARD TO THE GROUNDS FOR REFUSAL, IT WOULD BE UNREASONABLE TO DO SO); AND
- AVAILABLE COMPLAINT MECHANISMS.

IN ADDITION, IF WE REFUSE TO CORRECT PERSONAL INFORMATION IN THE MANNER YOU HAVE REQUESTED, YOU MAY ASK US TO ASSOCIATE YOUR REQUEST WITH THE INFORMATION AND WE WILL TAKE REASONABLE STEPS TO DO SO.

13. UNIQUE IDENTIFIERS

WE WILL NOT ASSIGN UNIQUE IDENTIFIERS TO YOU UNLESS THE ASSIGNMENT OF UNIQUE IDENTIFIERS IS NECESSARY TO ENABLE US TO CARRY OUT ANY OF OUR FUNCTIONS EFFICIENTLY. FURTHER, WE WILL NOT REQUIRE AN INDIVIDUAL TO PROVIDE A UNIQUE IDENTIFIER (E.G. YOUR TAX FILE NUMBER) UNLESS REQUIRED OR AUTHORISED BY LAW.

14. COMPLAINTS

IF YOU HAVE A COMPLAINT ABOUT HOW WE HAVE COLLECTED OR HANDLED YOUR PERSONAL INFORMATION, PLEASE CONTACT OUR PRIVACY OFFICER (DETAILS UNDER HEADING 15 BELOW).

WE WILL ENDEAVOUR IN THE FIRST INSTANCE TO DEAL WITH YOUR COMPLAINT AND TAKE ANY STEPS NECESSARY TO RESOLVE THE MATTER WITHIN A WEEK. IF WE ARE NOT ABLE TO DO SO, WE WILL ASK YOU TO SUBMIT YOUR COMPLAINT IN WRITING.

IN MOST CASES, WE EXPECT TO INVESTIGATE WRITTEN COMPLAINTS AND PROVIDE A RESPONSE WITHIN 30 DAYS OF RECEIPT. IF THE MATTER IS MORE COMPLEX AND OUR INVESTIGATION MAY TAKE LONGER, WE WILL CONTACT YOU AND TELL YOU WHEN WE EXPECT TO PROVIDE OUR RESPONSE.

IF YOU ARE NOT SATISFIED WITH OUR RESPONSE, YOU CAN REFER YOUR COMPLAINT TO THE OFFICE OF THE AUSTRALIAN INFORMATION COMMISSIONER (SEE [HERE](#) FOR FURTHER INFORMATION).

15. OUR CONTACT DETAILS

PLEASE CONTACT US IF YOU HAVE ANY QUERIES ABOUT THE PERSONAL INFORMATION THAT WE HOLD ABOUT YOU OR THE WAY WE HANDLE THAT PERSONAL INFORMATION. OUR CONTACT DETAILS ARE SET OUT BELOW.

MAIL: PRIVACY OFFICER, 168 WILLIAMS ROAD, PRAHRAN, VICTORIA 3181

EMAIL: INFO@GURNER.COM.AU

TELEPHONE: +61 3 9654 6222

FURTHER GENERAL INFORMATION ABOUT PRIVACY IS AVAILABLE ON THE WEBSITE OF THE OFFICE OF THE AUSTRALIAN INFORMATION COMMISSIONER AT WWW.OAIC.GOV.AU OR BY CALLING THE OAIC'S ENQUIRY LINE AT 1300 363 992.

16. CHANGES TO THIS POLICY

WE MAY AMEND THIS PRIVACY POLICY FROM TIME TO TIME. THE CURRENT VERSION WILL BE POSTED ON OUR WEBSITE AND A COPY MAY BE OBTAINED BY CONTACTING OUR PRIVACY OFFICER (DETAILS ABOVE). ALL AMENDED TERMS WILL AUTOMATICALLY TAKE EFFECT IMMEDIATELY ON POSTING. PLEASE CHECK THIS PRIVACY POLICY PERIODICALLY TO INFORM YOURSELF OF ANY CHANGES. IF YOU DO NOT ACCEPT THE CHANGES MADE TO THIS PRIVACY POLICY, YOU SHOULD IMMEDIATELY STOP USING THE WEBSITE AND OUR PRODUCTS AND SERVICES.

ATTACHMENT A - GURNER™ WELLNESS GROUP PERSONAL INFORMATION COLLECTION STATEMENT

Your personal information is being collected by Gurner Group Wellness Operations Pty Ltd ABN 38 670 532 975 and Gurner Group Wellness (Saint) Operations Pty Ltd ABN 93 675 336 517 (GURNER™ Wellness Group, We or Our) in order to provide services and facilities to you.

GURNER™ Wellness Group collects, holds, uses and discloses personal information, health information and sensitive information (as defined in applicable legislation) about you in accordance with this Collection Statement and our Privacy Policy, outlined below.

GURNER™ Wellness Group collects information, health information and sensitive information from you and from third parties, such as Oura Health.

The purposes for which GURNER™ Wellness Group is collecting your personal information are:

- to ensure that the services and facilities we provide are appropriate and safe for you;
- to administer your membership and collect your membership fees;
- to provide health and wellness recommendations via our GURNER™ Wellness Group Members App based on your Oura Ring readiness score. This data is only stored for 24 hours on a secure server; and
- for purposes described in our Privacy Policy.

GURNER™ Wellness Group will use that information for these purposes, and we may also use it to contact you to comply with our regulatory and legal obligations, as well as to contact you (including by way of email) in response to your inquiries about our facilities and services.

GURNER™ Wellness Group may share your health information with people or organisations for medical, ethical, insurance, legal and management and/or procedural purposes, including:

- insurers for the purposes of benefits payable or other third parties for billing/accounting purposes (such as Medicare, your private health insurer fund, workers compensation insurer or transport accident insurer);
- your representatives (such as a guardian, carer, family member or legal advisor);
- our professional advisors (such as auditors and legal advisors);
- local contractors whom we have partnered with to provide services to our business operations;
- government and regulatory authorities or other bodies as required by or authorised under Australian law;
- in limited circumstances, research bodies; and
- to our related bodies corporate and to other persons or entities as outlined in our Privacy Policy.

If you do not provide your personal information, we may not be able to provide you access to our facilities or provide you with our services.

We otherwise use, disclose, process and handle your personal information, health information and sensitive information in accordance with our Privacy Policy.

While your personal information, health information and sensitive information is collected in Australia, it is unlikely that it will be disclosed to overseas recipients outside of Australia.

More detailed information about the way GURNER™ Wellness Group uses and discloses your personal information and overseas disclosures is set out in our comprehensive Privacy Policy. Our Privacy Policy also contains the contact details of our Privacy Officer and information regarding your rights (including how to

withdraw your consent, if applicable) and how you can seek to access and correct your personal information or raise a privacy concern with us and how it will be dealt with.

If you have any questions or concerns about this Privacy Collection Statement, our Privacy Policy or how we handle your personal information, please contact our Privacy Officer kate@gurner.com.au or +61 3 9654 6222, or by post to Privacy Officer, 168 Williams Road, Prahran, Victoria 3181.