GURNER™ REAL ESTATE GROUP PRIVACY POLICY

1. GURNER™ REAL ESTATE GROUP'S COMMITMENT TO PRIVACY

GURNER™ Group is a luxury private development, design and lifestyle business with multiple business divisions spanning wellness, hospitality, design, property management, funds management and Build-To-Sell and Build-To-Rent property development.

This Privacy Policy applies to the GURNER™ Real Estate Group, comprising Gurner Hospitality Pty Ltd (ACN 677 189 329), Gurner RE Services Pty Ltd (ACN 674 978 637), Gurner RE Capital Pty Ltd (ACN 677 189 025), Gurner RE Sales (VIC) Pty Ltd (ACN 677 191 829), Gurner RE Sales (QLD) Pty Ltd (ACN 680 944 978), Gurner RE Sales (NSW) Pty Ltd (ACN 690 091 297), Life by Gurner Customer Service Pty Ltd (ACN 648 589 995), Life R.E.P.M Pty Ltd (ACN 647 929 799), GPG Services Pty Ltd (ACN 660 186 032), LBG People Pty Ltd (ACN 654 704 266) and their respective related entities (together, the **GURNER™ Real Estate Group, we, us** or **our**). If you would like to know more about the relevant legal entities that form part of the GURNER™ Real Estate Group, please contact us using the relevant contact details set out in section 16.

The GURNER™ Real Estate Group handles the personal information we collect about you in accordance with this Privacy Policy and our obligations under the *Privacy Act 1988* (Cth) (**Privacy Act**), including the Australian Privacy Principles (**APPs**).

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™ Real Estate Group's handling of your personal information, please contact us using the relevant contact details set out in section 16.

2. ABOUT GURNER™ REAL ESTATE GROUP

GURNER™ Real Estate Group undertakes the acquisition, design, construction, development and delivery of real estate projects across Australia, as well as the sales, marketing and leasing activities associated with those projects and the ongoing management and operation of completed projects.

The GURNER™ Real Estate Group deals with members of the public (including prospective and actual purchasers and tenants) in person, through sales events and open for inspection activities, through our website and social media channels, and through our marketing activities.

For more information regarding the GURNER™ Real Estate Group, please visit our website: https://www.gurner.com.au/real-estate.

3. ABOUT THIS PRIVACY POLICY

This document sets out our policies for managing your personal information and is referred to as our **Privacy Policy**.

In this Privacy Policy, "we", "us" and "our" refer to the GURNER™ Real Estate Group and "you" and "your" refer to any individual about whom we collect personal information.

This Privacy Policy sets out how we collect, store, process, use and disclose personal information (including personal information we collect, and personal information submitted to us, whether offline or online).

Other terms and conditions may apply to you such as:

- the privacy terms and conditions contained in contractual arrangements we may have with you; and
- the collection notices and privacy statements which may be provided to you at the time your personal information is collected (for example, the collection notice provided when you register your interest in, or purchase, a property, enter into a tenancy, or apply to work with us).

4. WHAT IS PERSONAL INFORMATION?

'Personal information' is defined in the Privacy Act, and means 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.

In this Privacy Policy, whenever we use the term 'personal information', we are referring to this legal definition.

Personal information also includes 'sensitive information', which is information such as your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, sexual orientation or practices, criminal record, biometric information used for biometric verification or identification, biometric templates, and health information. Information which is 'sensitive information' attracts a higher privacy standard under the Privacy Act and is subject to additional mechanisms for your protection.

'Health information' is also defined in the Privacy Act, and means:

- information or an opinion about the health or disability of an individual;
- information or an opinion about an individual's expressed wishes about the future provision of health services to that individual; or
- personal information collected to provide, or in providing, a health service.

Where required to do so under the APPs, we will take reasonable steps to notify you of the types of personal information we collect about you.

5. WHAT INFORMATION DO WE COLLECT ABOUT YOU AND HOW DO WE COLLECT THIS INFORMATION?

In order to provide you with the services that you have requested, or to otherwise interact with us, GURNER™ Real Estate Group may need to collect your personal information.

In summary, we may collect your personal information when you:

- purchase, or express an interest to purchase, a GURNER™ Real Estate Group home or apartment (for example, when entering into a sale and purchase agreement, or when responding to requests for information about a GURNER™ Real Estate Group home or residence);
- lease, or express an interest to lease, premises, or spaces (for example, when negotiating, entering into or applying to enter into a lease with GURNER™ Real Estate Group);

- interact with us in person, such as when you attend a sales event, display suite or open for inspection;
- interact with us via phone or online (including through our website and social media channels), such as when you contact us to make an enquiry, register your interest in a property, discuss purchasing or leasing options, give us feedback or otherwise share your information with us;
- use any of the services we offer to owners or tenants of our properties;
- interact with us in a professional or commercial capacity, including as an investor, a contractor or a business partner;
- have a third party provide your personal information on your behalf; or
- apply for a position with us (including for work experience or student placements).

Summary of personal information we collect and how we collect this information

The types of personal information we usually collect about you depend on who you are and your dealings with us. However, the table below sets out a summary of the personal information we generally collect and how we collect this information:

Who are we collecting personal information from?	What type of information may we collect?	How do we collect this information?
Customers, including prospective or actual purchasers and tenants	If you are a customer (including a prospective or actual purchaser or tenant), we may collect the following information: • name and contact details (including full name, residential address, email address and phone number); • date of birth; • financial information, including credit and debit card details, bank account details and payment information; • government-related identifiers, including passport details, driver licence details and tax file numbers (including scans of identity documents where required for identity verification or compliance purposes); • details about the property you are purchasing or leasing; and • health information in limited circumstances (for example, information required to access gym or fitness facilities within a building).	We may collect this information directly from you (in person at sales events, display suites or open for inspection activities, via our website, by phone, through our social media channels or when you access or use our free WiFi services), or from third parties such as selling agents, mortgage brokers, customer representatives or the relevant land titles registry. We will only collect your sensitive information with your consent or if we are otherwise permitted to do so under the Privacy Act.

Who are we collecting personal information from?	What type of information may we collect?	How do we collect this information?
Investors, independent contractors and business contacts	If you are an investor, independent contractor or business contact, we may collect the following information: • name and contact details (including full name, address, email address and phone number); • your role, organisation and relevant professional or business information; • financial information relevant to your investment or business dealings with us (such as bank account details); and • government-related identifiers (such as driver licence or passport details) where required for identity verification or compliance purposes.	We may collect this information directly from you or from third parties (including company directors, referees and relevant government agencies).
Job / work experience applicants	If you are applying to work with us, we may collect the following information: • name and contact details; • information relating to your work history; • government-related identifiers, including passport details, driver licence details and tax file numbers (including scans of identity documents where required for identity verification or compliance purposes); • information about your education and qualifications and the institution you studied / are studying at; • your working eligibility rights; • your suitability for the role you are applying for; • health information where relevant to your employment with us, for example, pre-existing injury declarations, medical history (including return-to-work plans) or disability information (where voluntarily provided);	We may collect this information if you apply for a position with the GURNER™ Real Estate Group (including if you are applying for work experience with us). We will only collect your sensitive information with your consent or if we are otherwise permitted to do so under the Privacy Act.

Who are we collecting personal information from?	What type of information may we collect?	How do we collect this information?
	• work performance and training details; • superannuation fund details; • criminal history record; • credentialing information including licences and professional registrations, accreditations and working with children checks; • emergency contact details; and • details about your referees.	
Other individuals	We may collect basic personal information about visitors to our premises, online users and other individuals who interact with us, such as name and contact details. We may also collect camera surveillance information about visitors to our premises.	We may collect this information when you visit our premises, use our website or online services, or otherwise interact with us.

We may also collect other types of information, which we have summarised below:

Type of personal information	What this includes	How do we collect this information?
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. Please see section 11 for further information on the digital information we collect.	We may collect this information when you use our website, our free WiFi services or any other online services, via use of online behavioural technologies, such as cookies. Please see section 11 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 premises for the safety of our staff and customers, such as where you attend our offices, sales offices, display suites or buildings in which we operate.
Information required to be collected for anti-money	We may collect information from you for the purposes of	We may collect this information as required to

laundering and counter-terrorism financing (AML / CTF) purposes	our obligations under the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth), including: • your occupation; • any other name you are known by; • your reason for engaging the service; • where you are a sole trader, business name and address of the principal place of business; • your industry or business activity; • the ownership and control structure of your organisation; • the powers that bind and govern your organisation; and • the identity and authority of any person acting on your behalf.	comply with our AML / CTF obligations.
Information required to be collected by law	We may collect information as required by law.	We may collect this information in the manner required or permitted by law.
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).

In some cases you may provide us with personal information which relates to another person (for example, an emergency contact). If you do so, you confirm that you have informed these individuals and, where required, have received their permission 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).

6. CAN YOU DEAL WITH US WITHOUT PROVIDING YOUR NAME?

Where possible and lawful, you may interact with us anonymously or using a pseudonym (a fictitious name). For example, if you contact us with a general question or query, we will not record your name or other details unless we need them to adequately respond to your query.

However, for many of our functions and the services we provide (in particular, where you are purchasing or leasing property) it is not practicable for us to deal with you anonymously or using a pseudonym on an ongoing basis. For example, identity verification is required as part of the tenancy application process and the property purchase process.

If you provide incomplete or inaccurate personal information to us, or withhold personal information from us, we may not be able to provide you with the services you are seeking.

7. WHY DO WE COLLECT, STORE AND USE YOUR PERSONAL INFORMATION?

The primary purpose for which we collect your personal information (including, where applicable, sensitive information, such as criminal record information or health information) will depend on who you are and your interaction with us, for example, if you are a customer, prospective customer, job applicant, contractor, or other authorised representative of a customer.

We have summarised the types of purposes for which we may collect your personal information in the following table:

Purpose	Explanation
To provide you with our services	We may collect, store and use your personal information to: • process and administer your property purchase, tenancy application and/or leasing arrangement, including to review your compliance with relevant contractual terms and conditions; • provide you with our real estate services, including sales, marketing, leasing, property management and associated services; • identify you and verify your identity in accordance with our legal obligations and for the purposes of our services; • manage our relationship with you; • bill you or a third party on your behalf for our services, including to facilitate and manage the payment of deposits, holding deposits, security bonds and purchase or lease payments; • improve our services, and your experience with us; and/or • otherwise effectively provide our services to you.
To manage your working relationship with us (including when you are a contractor)	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. We may collect, store and use your personal information for administration and management purposes.
To do business with you	We may collect, store and use your personal information if you interact with us on a commercial basis (such as if you are a real estate agent, selling agent, property manager, valuer, service provider, contractor or supplier to us), or you otherwise interact with us on a commercial basis.

To manage and improve our operations and business and services	We may collect, store and use your personal information to: • manage fees and administer billing (including administration of third-party payment arrangements) and debt recovery; • manage, monitor, plan and evaluate our services; • undertake record-keeping and auditing; • conduct safety and quality assurance and improvement activities, including quality control of our services and communications with you; • train staff; • test, train, improve and develop our technology systems, products and services; • undertake risk and operational management processes; • 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; • maintain the security of our facilities; and/or • assist with service development, to test the effectiveness and customer satisfaction of our products and services, improve the way we provide services to you, and for other quality assurance and compliance purposes.
To promote or advertise the services of our related entities, business partners, contractors, associates and other third parties	We may collect, store and use your personal information to promote or advertise our services or facilities or the services of our related entities, business partners, contractors, associates and other third parties, as further described in section 10 of this Privacy Policy.
To assist with any business, share sale or corporate restructure	We may collect, store and use your personal information for the purpose of considering, 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 or proposal for any such transaction.

8. WHO DO WE SHARE YOUR PERSONAL INFORMATION WITH AND WHY?

We may share your information with third parties:

- for the reasons for which we collect, store and use that information (see above in section 7);
- for other purposes explained at the time we collect your personal information; or

- where we are otherwise allowed or required to do so by law.

Some of the third parties we may share your information with include the following:

Recipient	Explanation
Real estate agents, selling agents, property managers and transaction counterparties	We may share your personal information with real estate agents, selling agents and property managers engaged by us to facilitate the sale, marketing, leasing or management of real estate on our behalf. In connection with property transactions, we may also share your personal information with settlement agents, conveyancers, the relevant land titles registry, incoming property managers (on management transfer), mortgage brokers and other parties involved in completing those transactions.
Our service providers and advisors	We may share your personal information with a variety of our service providers to assist us with providing and managing our services. These may include our: • IT service providers and third-party storage providers (including our property management and CRM platforms); • IT support services; • data analysis organisations; • other members of the GURNER™ Group, to the extent such members provide corporate services to the GURNER™ Real Estate Group; and • professional advisors and consultants (such as legal, insurance and financial advisors).
Payroll and employment service providers	We may share your personal information with payroll providers, superannuation administrators, WorkCover and workers' compensation bodies, immigration service providers, and other service providers engaged to assist us in managing our employment and contractor relationships, for the purposes of payroll processing, superannuation, workers' compensation, gender equity reporting and visa compliance.
Funders of services, insurers or credit reporting bodies	We may share your personal information with: • credit-reporting bodies or debt-collection agencies; and • our insurers. • credit-reporting bodies or debt-collection agencies; • our insurers; • law enforcement agencies and regulatory bodies where required.
Corporate restructure	We may share your personal information with third parties, whether affiliated or unaffiliated, 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. In this context, your personal information may be disclosed to a prospective or actual purchaser or other entity involved in that transaction (including where such a sale, transfer, acquisition or corporate restructure is being contemplated by us).
Government and law enforcement agencies	We may be required by certain Commonwealth, State or Territory legislation to report information to government agencies, regulatory bodies and law enforcement agencies, including in connection with real estate transactions, anti-money laundering and counter-terrorism financing compliance, employment and other legal obligations.

9. DO WE SHARE YOUR PERSONAL INFORMATION OVERSEAS?

We generally collect your personal information in Australia. However, some of the organisations we may disclose your personal information to are located outside Australia, including in the United States and the Philippines. These recipients include our service providers who may handle, process or store your personal information on our behalf.

We also conduct selling and marketing activities with international buyers, predominantly in Asian markets, and may collect personal information about individuals located outside Australia in the same manner as we collect information about individuals within Australia.

For example, we may share your personal information with service providers who assist us with storing our data on secure data storage servers, or with improving our services (by analysing data and conducting customer satisfaction enquiries).

We only ever share your personal information outside of Australia where we are permitted to do so under the Privacy Act. Where we disclose personal information overseas, we take reasonable steps to ensure the recipient handles it consistently with the APPs.

There are other circumstances where we may disclose your personal information to an overseas recipient. For example, where you have provided your consent or we are otherwise permitted to do so under other relevant laws.

10. DO WE USE OR SHARE YOUR PERSONAL INFORMATION FOR DIRECT MARKETING?

When you provide your personal information to GURNER™ Real Estate Group, we may use that personal information to send you direct marketing communications to keep you informed about services offered by the GURNER™ Real Estate Group and carefully selected partners which we think might be of interest to you based on your interactions with us.

We may contact you from time to time, whether by phone, SMS, email or post, to provide you with information regarding our services, projects, events, promotions and opportunities, or to ask for your feedback through surveys on how you found our services.

We will only send these communications in accordance with applicable privacy and marketing laws (such as the Privacy Act (including APP 7) and the *Spam Act 2003* (Cth)), and only where you have not opted out from receiving such communications from GURNER™ Real Estate Group.

If you have indicated a preference for a method of communication, we will endeavour to use that method wherever practical to do so.

How can you opt out?

You are always in control of the direct marketing communications which you receive and can opt out at any time. Generally, you can opt out by following the relevant opt-out or unsubscribe instructions in the relevant communication (such as email or SMS message).

You can also contact us using the details set out in section 16 to tell us you would like to stop receiving direct marketing communications from us.

Important points regarding opting out

Importantly, regardless of whether you opt out from receiving any or all direct marketing communications, we will still communicate with you if we are required by law to provide you with information, or in relation to the services we are providing you with (for example, sending you an invoice in relation to a provided service or sending an SMS reminder about a scheduled visit or inspection).

11. HOW DO WE INTERACT WITH YOU VIA THE INTERNET?

Third party links and sites

When you use our websites or receive communications from us, links to websites and/or apps which belong to other third parties may be included (and are provided for your convenience). You should make your own enquiries as to the privacy policies of these parties. We are not responsible for information on, or the privacy practices of, any third party websites or apps.

Website use and cookies

You may visit our websites without identifying yourself. If you identify yourself (for example, by making an enquiry), any personal information you provide to us will be managed in accordance with this Privacy Policy.

Our websites also use cookies, and we may share information collected through cookies between members of the GURNER™ Real Estate Group. A 'cookie' is a small file stored by your browser on your device, which assists in managing customised settings of the website and delivering content. We collect certain information such as your device type, browser type, "click-through" information, IP address, pages you have accessed on our websites and on third-party websites. Depending on the circumstances, this may or may not be personal information.

At a high level, cookies can be used for a variety of reasons, such as to personalise your browsing experience (for example, by remembering your preferences and recognising you as a repeat visitor to our websites), and to track statistics about the usage of our website. This allows us to better understand our users and improve the layout and functionality of our websites.

If you do not wish to receive any cookies (other than those that are strictly necessary) you can use the settings in your browser to control how your browser deals with cookies. However, in doing so, you may be unable to access certain pages or content on our websites.

Automated decision-making: We do not currently use computer programs to make, or to do things substantially and directly related to making, decisions using your personal information that could reasonably be expected to significantly affect your rights or interests. If this changes, we will update this Privacy Policy.

12. HOW DO WE STORE AND PROTECT YOUR PERSONAL INFORMATION?

We are committed to protecting your personal information, and taking reasonable steps to ensure that we securely store any personal information we collect (and in accordance with the Privacy Act). We may hold your personal information in hard copy (paper) or electronic form.

We take reasonable steps to ensure that any personal information we collect, use or disclose is accurate, complete, up-to-date and stored in a secure environment protected from misuse, interference and loss, and from unauthorised access, modification or disclosure.

If we experience a data breach that is likely to result in serious harm to you, we will notify you and the Office of the Australian Information Commissioner in accordance with the Notifiable Data Breaches scheme under the Privacy Act.

Security and storage of personal information

Form	Explanation
Paper-based files	We store personal information in paper-based files in secure storage at our premises (including our head office, sales offices and display suites). Personal information may be collected in paper-based documents and converted to electronic form for use or storage (with the original paper-based documents either archived or securely destroyed). We maintain physical security measures to ensure that personal information in paper-based files is protected, such as security systems at our premises.
Electronic records	We store electronic records in secure databases and cloud-based platforms, using trusted third-party storage and software providers. These providers may be based in Australia and, in some cases, overseas (including in the United States and the Philippines). We also maintain physical and technical security measures in relation to the storage of our electronic records (including through login controls, access restrictions and security systems at our electronic data stores). Using technical methods, we also maintain computer and network security. For example, we use firewalls (security measures for the internet) and other security systems such as user identifiers and passwords to control access to our computer systems.
Our websites (including for making payments)	Our websites and digital platforms use encryption and other technologies to ensure that your personal information is securely transmitted via the internet (including to protect any payments you make). We also use DocuSign for the electronic execution of agreements, which encrypts documents in transit. We encourage you to exercise care when sending your personal information via the internet (for example, when communicating with us online, we ask that you do not include your full account or card details).

How long do we keep your personal information?

We will endeavour to keep your personal information for as long as is reasonably necessary for the purposes set out in this Privacy Policy or as required to comply with any applicable legal obligations.

When we no longer require your personal information (and in accordance with any applicable laws), we will take reasonable steps to destroy or de-identify that information.

13. HOW CAN YOU ACCESS OR SEEK CORRECTION OF YOUR PERSONAL INFORMATION?

You are entitled to request access to any of your personal information that we hold. To make such a request, please contact us using the relevant contact details set out below in section 16.

We take reasonable steps to ensure that the personal information we collect, use or disclose is accurate, complete and up-to-date. You can help us to do this by letting us know if you notice errors or discrepancies in information we hold about you and informing us of any change in your personal details (for example, if your email address changes or if you move and change address).

If you consider any personal information we have about you is inaccurate, out-of-date, incomplete, irrelevant or misleading, you are also entitled to request correction of the information (again, please contact us). After receiving a request from you, we will consider that request and, where reasonable, endeavour to take steps to correct your information.

We may decline your request to access or correct your information in certain circumstances in accordance with the Privacy Act. If we do refuse your request, we will generally provide you with a reason for our decision, to the extent we are able to do so under the Privacy Act. In addition, in the case we refuse your request for correction, we will include a statement about your request with the personal information we store.

14. HOW CAN YOU MAKE A COMPLAINT ABOUT THE HANDLING OF YOUR PERSONAL INFORMATION?

If you have any questions or concerns about this Privacy Policy or how we have handled your personal information, you may contact us at any time using the relevant contact details set out below in section 16.

Please also contact us if you have a complaint about privacy. If you make a complaint about privacy, the following will occur:

No.	Step
1.	We will first consider your complaint to determine whether there are simple or immediate steps which can be taken to resolve the complaint. We will endeavour to acknowledge your complaint in a timely manner.
2.	If your complaint requires more detailed consideration or investigation: • we will aim to acknowledge receipt of your complaint in a timely manner and endeavour to complete our investigation into your complaint promptly; and • we may ask you to provide further information about your complaint and the outcome you are seeking.
3.	We will then typically gather relevant facts, locate and review relevant documents and speak with the individuals involved.
4.	We will endeavour to respond to your complaint within 30 days from when we receive your complaint. If the matter is more complex or our investigation may take longer, we will let you know.

If you are not satisfied with our response to a complaint, or you consider that we may have breached the Privacy Act (including the APPs), you are entitled to make a complaint to the Office of the Australian Information Commissioner (the Australian privacy regulator).

The Office of the Australian Information Commissioner can be contacted by telephone on 1300 363 992, or you can fill out this form to make a complaint about our handling of your personal information. Full contact details for the Office of the Australian Information Commissioner can be found online at www.oaic.gov.au.

15. HOW ARE CHANGES MADE TO THIS PRIVACY POLICY?

We may make changes to this Privacy Policy, with or without notice to you. However, where we make a material change to the Privacy Policy, we will take reasonable steps to provide notice of that change, including by updating our website. We recommend you visit this Privacy Policy regularly to keep you up to date with any changes we make.

16. HOW CAN YOU CONTACT US?

You can contact us using the details below:

GURNER™ REAL ESTATE GROUP	
Phone	(03) 9654 6222 You can contact us during business hours (9.00am to 5.00pm, Monday to Friday AEST/AEDT).
Email	privacy@gurner.com.au
Postal address	Level 3, 10 River Street, South Yarra VIC 3141

VERSION CONTROL		
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