

## **FRIDCORP PRIVACY POLICY**

[Hville FCP] (A.B.N 26 512 844 378) (**Fridcorp**) is subject to the *Privacy Act 1988* (Cth), which provides for the fair handling of personal information, and which sets standards for the collection, access, storage and use of personal information. We recognise that the privacy of our customers and others who share information with us is important and that they have the right to control it.

Fridcorp is also subject to State and Territory health privacy legislation including the *Health Records Act 2001* (VIC) and the *Health Records and Information Privacy Act 2002* (NSW).

### **1. ABOUT THIS PRIVACY POLICY**

- 1.1 This Privacy Policy outlines how we manage your personal information, the kinds of personal information we collect and how that information is collected, held, used and disclosed.
- 1.2 Fridcorp is a privately owned property development company based in Melbourne and Sydney, operating in the residential and commercial sectors across the eastern seaboard of Australia. Fridcorp understands the importance of, and is committed to, protecting your personal information in accordance with applicable Australian privacy laws.
- 1.3 This Privacy Policy applies to all your dealings with us whether using Fridcorp's website ([beyondhurstville.com.au](http://beyondhurstville.com.au)), in writing or in person. By dealing with Fridcorp, you consent to our use and disclosure of your personal information in the manner described in this Privacy Policy.
- 1.4 We encourage you to check our website regularly for any updates to our Privacy Policy.

### **2. PERSONAL INFORMATION WE COLLECT**

- 2.1 The type of personal information Fridcorp collects depends on the nature of your dealings with us.
- 2.2 Fridcorp may need personal information about you if you:
  - (a) purchase, or express an interest to purchase, a Fridcorp home or apartment (for example, when entering into a sale and purchase agreement, or when responding to requests for information about a Fridcorp home or apartment);
  - (b) lease, or express an interest to lease, premises, or spaces, including any related guarantors (for example, when negotiating, entering into or applying to enter into a lease with Fridcorp).
- 2.3 Fridcorp may need personal information about you if you or your employer or a related corporate entity:
  - (a) purchase, or express an interest to purchase, Fridcorp commercial premises (for example, when entering into a sale and purchase agreement, or when responding to requests for information about Fridcorp commercial premises);
  - (b) lease, or express an interest to lease, commercial premises, or spaces (including retail pop up spaces), including any related guarantors (for

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example, when negotiating, entering into or applying to enter into a lease with Fridcorp).

In these circumstances the personal information we may need includes your name and contact details and your opinion or preferences about Fridcorp's products, services and staff.

- 2.4 If you are purchasing from us we will need to verify your identity (for example by taking a copy of your passport and driver's licence) and may require information about your financing arrangements and residency status.
- 2.5 If you are acting or are working for someone who is purchasing from us such as a solicitor, conveyancer or financier we may need your name and contact details. Your client is likely to provide us with these details.
- 2.6 If you or your employer provide goods or services to Fridcorp we may need;
  - (a) your contact information such as full name, email-address and phone numbers;
  - (b) your role;
  - (c) IP address;
  - (d) browser and device particulars;
  - (e) any relevant payment or billing information (including bank account details, direct debit, credit card details and billing address);
  - (f) details of your availability;
  - (g) any other personal information that may be relevant to how those goods or services are provided to Fridcorp.
- 2.7 Fridcorp generally does not collect sensitive personal information about an individual. However, in certain circumstances, Fridcorp may collect some sensitive information if it is necessary to allow Fridcorp to deal with the individual and provided the individual has given consent for Fridcorp to do so. For example, if you are purchasing from us and you require us to modify the home or apartment to improve access this may require us to collect sensitive health information from you.
- 2.8 If you apply for a job with us, you may provide us with certain information, including your name, employment and educational background, and other personal information which we may require you to provide, or which you choose to provide to us.
- 2.9 If we receive your personal information from third parties, we will protect it as set out in this Privacy Policy.

### **3. HOW WE COLLECT PERSONAL INFORMATION**

- 3.1 How we collect personal information also depends on the nature of your dealings with us.

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- 3.2 We collect personal information directly from you whenever it is reasonable and practical to do so. We may collect personal information from:
- (a) your agents – for example, your solicitor, mortgage broker or financier;
  - (b) third parties if you consent to us contacting them; or
  - (c) if the information is available on a public register..

3.3 If you provide goods or services to Fridcorp we collect personal information directly from you whenever it is reasonable and practical to do so. We may collect personal information from third parties nominated by you.

3.4 If your employer provides goods or services to Fridcorp we collect personal information directly from you or your employer. We may also collect personal information from third parties nominated by you or your employer.

#### **4. COLLECTING PERSONAL INFORMATION FROM OUR WEBSITE**

4.1 Fridcorp collects some information from you when you use our website. Your use of the facilities and services available through our website will determine the amount and type of information which we collect about you. Some of this information will not be personal information because it will not reveal your identity.

4.2 While we take great care to protect your personal information on our website, no data transmission over the internet can be guaranteed to be 100% secure. Accordingly, we cannot ensure or warrant the security of any information that you send to us or receive from us online. This is particularly true for information you send to us via email. We have no way of protecting that information until it reaches us. Once we receive your transmission, we make our best effort to ensure its security in our possession.

4.3 Our website may contain links/plug-ins to other sites. We are not responsible for the content of, or the privacy practices or policies of, those sites.

#### **5. USE OF COOKIES**

5.1 A cookie is a small message given to your web browser by our web server. The browser stores the message in a text file, and the message is then sent back to the server each time the browser requests a page from the server. We may use cookies to provide us with anonymous aggregate information on how people use our website and to help us to know what they find interesting and useful on our website. We do not store personal information such as email addresses or other details in a cookie.

5.2 Most web browsers are set up to accept cookies. If you do not wish to receive cookies, you may be able to change the settings on your web browser to refuse all cookies or to notify you each time a cookie is sent to your computer, giving you the choice whether to accept it or not.

#### **6. HOW WE USE PERSONAL INFORMATION**

6.1 Generally, how Fridcorp uses personal information will be apparent from the way in which we collect it, or will be disclosed at the time of collection.

- 6.2 If you are one of our customers, we use information for a range of purposes which include:
- (a) providing you with products or services that have been requested;
  - (b) communicating with you;
  - (c) assessing the suitability of prospective tenants;
  - (d) helping Fridcorp manage and enhance its products and services, including analysing customer feedback and future customer needs;
  - (e) providing ongoing information and marketing about products and services to individuals that Fridcorp believes may be interested and where the individual has signed up; and
  - (f) complying with regulatory and legal obligations;
- 6.3 If you or your employer provides products or services to Fridcorp, we use information for a range of purposes which include:
- (a) to allow you to provide us with your products and services, or information regarding your products and services;
  - (b) to communicate and administer our relationship and dealings with you or your employer efficiently.
- 6.4 If you apply for a job with us, we will hold, use and disclose that information solely for the purpose of considering your application. In particular, in considering your application, it may be necessary for us to disclose some of that information to third parties to verify the accuracy of that information. In such circumstances, we will disclose only such information as is reasonably necessary. In considering your application, we may also collect personal information about you from any third parties that you nominate as your referees in your application.

## 7. **MARKETING**

- 7.1 Fridcorp may send marketing materials to customers or potential customers where Fridcorp has collected the personal information from the individual and the individual would reasonably expect Fridcorp to use the information for that purpose.
- 7.2 The individual's prior consent will be obtained before personal information is used for marketing purposes in situations where:
- (a) the personal information has been collected from the individual and the individual would not reasonably expect Fridcorp to use the information for that purpose;
  - (b) the personal information has not been collected directly from the individual; or
  - (c) where sensitive information is involved.
- 7.3 If you no longer wish Fridcorp to use your personal information to provide marketing materials, please advise Fridcorp via the relevant method provided in the

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electronic marketing message sent to you (e.g. via an 'unsubscribe' link) or write to the Fridcorp Privacy Officer (refer to contact details below).

## **8. PERSONAL INFORMATION WE DISCLOSE**

- 8.1 In general, we disclose your personal information to others when it is necessary to allow us to use your personal information for one of the reasons described in paragraph 6.
- 8.2 Fridcorp will not sell, rent or lease your personal information to others.
- 8.3 Fridcorp may disclose your information where Fridcorp is authorised or required by law to disclose information to third parties.

## **9. DISCLOSURE OF PERSONAL INFORMATION OVERSEAS**

- 9.1 If we disclose your information to third parties who are overseas, it is a condition of that disclosure that the recipient agrees to be bound by this Privacy Policy and comply with the Privacy Act.

## **10. HOW WE KEEP PERSONAL INFORMATION SECURE**

- 10.1 Fridcorp is committed to ensuring the security of your personal information. We use secure network links, which are complemented by firewalls, hardware and software encryption technology, password protection, virus protection, restrictions on employee access and other internal procedures in order to safeguard your personal information.

## **11. ACCESSING AND CORRECTING YOUR PERSONAL INFORMATION**

- 11.1 You can request access to your personal information by contacting us using the contact information on our website. Before we are able to provide you with access to your personal information, we will require some proof of identity. For most requests, your information will be provided free of charge. However, we may charge a reasonable fee if your request requires a substantial effort by us.
- 11.2 If any of the personal information you have provided to us is inaccurate, out of date or incomplete (for example, if you move or change your phone number), please let us know so that we can update and/or correct your personal information.
- 11.3 If you find any inaccuracies in your personal information, please let us know as soon as you become aware of the inaccuracy.

## **12. UPDATES TO THIS PRIVACY POLICY**

- 12.1 This Privacy Policy will be reviewed and updated by Fridcorp from time to time. Updated versions of this policy will be published on this website.
- 12.2 The updated Privacy Policy will apply whether or not specific notice of any change has been given.

## **13. HOW WE DEAL WITH PRIVACY COMPLAINTS**

- 13.1 Your privacy is important to Fridcorp and we will make every effort to resolve your concerns. To assist us in helping you, we ask you to follow a simple three-step process:
- (a) Gather all supporting documents about the matters which concern you, think about the questions you want answered and decide what you want us to do. You can telephone the Fridcorp Privacy Officer on 03 9964 7852. We will endeavour to review and if possible, resolve your concerns in a timely fashion.
  - (b) If you are not satisfied with our response, we may require you to submit your complaint in writing by email at [fiona@fridcorp.com.au](mailto:fiona@fridcorp.com.au) with your contact details. We will then investigate your complaint and endeavour to respond to you in writing within a reasonable period and in any event within 21 days of receipt of your written complaint.
  - (c) If at this stage the matter has not been resolved to your satisfaction, you can telephone the Australian Information Commissioner's hotline on 1300 363 992.

#### 14. **CONTACTING FRIDCORP**

- 14.1 Fridcorp welcomes your comments. If you have any questions or concerns about our Privacy Policy, please contact us using the details set out on our website.

**Date last revised:**