



# Privacy Policy

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**Owner:** Legal Team

**Approved by:** Jackie Su, Group General Counsel

**Date policy approved:** October 2018

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Commercial & General Pty Ltd and its associated and related entities listed in this Privacy Policy (**we, us, our**) are bound by the Australia Privacy Principles (**APPs**) in the *Privacy Act 1988* (Cth) (**Privacy Act**). We understand the importance of, and are committed to, protecting your personal information. This Privacy Policy explains how we manage personal information (that is, information or an opinion about an identified individual, or an individual who is reasonably identifiable), including our obligations and your rights in respect of our dealings with your personal information.

Please take a moment to read our Privacy Policy as it describes what happens to personal information that we collect about you, including personal information collected via our websites (**Websites**) at:

[www.commercialgeneral.com.au](http://www.commercialgeneral.com.au)

[www.livewest.com.au](http://www.livewest.com.au)

[www.gallerywest.com.au](http://www.gallerywest.com.au)

[www.thegrangewest.com.au](http://www.thegrangewest.com.au)

[www.liveatsalt.com.au](http://www.liveatsalt.com.au)

[www.88oconnell.com.au](http://www.88oconnell.com.au)

[www.tandembuilding.com.au](http://www.tandembuilding.com.au)

## 1. Who we are

We are an Australian vertically integrated property development, investment management and construction services group that together with our investors and partners, develop, construct, manage and invest in high quality healthcare, industrial, commercial and residential projects throughout Australia.

## 2. How we collect your personal information

We will collect and hold your personal information in a fair and lawful manner, and not in an intrusive way. Where it is reasonably practical to do so, we will collect your personal information directly from you. We may collect the personal information you directly give us through some of the following means:

- a. where you provide this in person, for example, when you visit one of our offices, Sales & Information Centres, or display homes;
- b. when you make an inquiry or order in relation to goods or services through one of our Websites;
- c. in administering and performing any contracts with service providers;
- d. when you contact us via telephone;
- e. from correspondence (whether in writing or electronically);
- f. through any mobile applications provided by our organisation;
- g. while conducting customer satisfaction and market research surveys;
- h. when administering any of our services;
- i. when you interact with us on our social media, such as liking our posts, commenting on our posts or private messaging us on our social media;
- j. when you register an account on our Websites and
- k. as otherwise required to manage our business.

However, in certain cases we may collect personal information from publicly available sources, such as telephone directories, or from other third parties, such as suppliers, recruitment agencies, contractors, our clients and business partners.

If we collect personal information about you from a third party we will, where appropriate, request that the third party inform you that we are holding such information, how we will use and disclose it, and that you may contact us to gain access to and correct and update the information.

## 3. Types of personal information we collect

The type of personal information we may collect can include (but is not limited to) your name, postal address, email address, phone numbers, date of birth, billing information and, if applicable, employment information.



Where you express an interest in our properties, we may also collect information about your circumstances and preferences, such as your target price range, desired property features, and any loan approvals you might hold. Personal information may also include network and device data such as IP address and device or advertising identifiers and information we obtain using cookies or other tracking technologies

We may also collect and hold sensitive information about you, including:

- a. health information;
- b. your racial or ethnic origin;
- c. your religious beliefs or affiliations;
- d. your membership of any trade unions, professional or trade associations, or political parties.

We only collect sensitive information about you with your consent, or otherwise in accordance with the Privacy Act.

Where you do not wish to provide us with your personal information, we may not be able to provide you with requested goods or services, or otherwise adequately respond to your queries.

We also collect personal information from third-party sources and platforms (including data validation services, authentication service providers, social networking sites, online marketing and segmentation providers and ad targeting companies). If your personal information is collected from third parties, we will notify you and provide you with details relating to the personal information collected and the manner in which it was collected. We will also ensure that we are permitted to receive the information. If we are permitted to receive the information, we will handle it pursuant to the relevant privacy principles. If we determine that we are not permitted to receive the information, we will, as soon as practicable, destroy the information or ensure that it is de-identified.

#### **4. Our purposes for handling your personal information**

As a general rule, we only process personal information for purposes that would be considered relevant and reasonable in the circumstances.

We collect, hold, use and disclose personal information to:

- a. offer and provide you with our goods and services;
- b. manage and administer those goods and services, including account keeping procedures;
- c. communicate with you, including (but not limited to), phoning, emailing and direct mailing you regarding the goods and services we provide, and providing you with tax invoices and other associated documentation;
- d. assess prospective employees;
- e. manage our contractors;
- f. comply with our legal and regulatory obligations;
- g. tell you about, or promote, our products or events that we think may be of interest to you;
- h. conduct marketing research and analysis; and
- i. otherwise manage our business.

We will not use or disclose your personal information for any other purpose unless we believe that you would reasonably expect this to occur, you have consented to such use or disclosure, or the use or disclosure is otherwise required or permitted by law.

We may disclose personal information between our organisations across the Commercial & General Group of Companies.

We may also disclose personal information to third parties such as our suppliers, contractors, organisations that provide us with technical and support services, or our professional advisors, where permitted by the Privacy Act. If we disclose information to a third party, we generally require that the third party protect your information to the same extent that we do.

## 5. Protection of personal information

We will hold personal information as either secure physical records, electronically on our intranet system, in cloud storage, and in some cases, records on third party servers, which may be located overseas.

We maintain appropriate physical, procedural and technical security for our offices and information storage facilities so as to prevent any loss, misuse, unauthorised access, disclosure, or modification of personal information. This also applies to disposal of personal information.

We further protect personal information by restricting access to personal information to only those who need access to the personal information to do their job. Physical, electronic and managerial procedures have been employed to safeguard the security and integrity of your personal information.

We will destroy or de-identify personal information once it is no longer needed for a valid purpose or required to be kept by law.

We will not be responsible for any unauthorised use of personal information by third parties which is attributable to factors beyond our control. We are not responsible for the online privacy practices of third parties.

Further, given that no data transmission over the internet can be guaranteed as completely secure, we cannot guarantee the security of any (personal or other) information you transmit to us, and as such we will not be liable for any breach of security or unintended loss or disclosure of information.

Whilst our Websites are professionally hosted and operate in a secure environment, you should be aware that there is always an inherent risk in transmitting your personal information via the internet.

## 6. Direct marketing

Like most businesses, marketing is important to our continued success. We believe we have a unique range of products and services that we provide to customers at a high standard. We therefore like to stay in touch with customers and other interested individuals to let them know about new opportunities. We may provide you with information about new products, services and promotions either from us, or from third parties which may be of interest to you.

You may opt out at any time if you no longer wish to receive commercial messages from us. You can make this request by contacting our Privacy Officer.

## 7. Cookies

A cookie is a small text file stored in your computer's memory or on your hard disk for a pre-defined period of time. We use cookies to identify specific machines in order to collect information on how visitors are experiencing our Websites. This information will help to better adapt the Websites to suit personal requirements. For information on cookie settings of your internet browser, please refer to your browser's manual.

## 8. Accessing and correcting your personal information

You may contact our Privacy Officer to request access to the personal information that we hold about you and/or to make corrections to that information, at any time. On the rare occasions when we refuse access, we will provide you with a written notice stating our reasons for refusing access. We may seek to recover from you reasonable costs incurred for providing you with access to any of the personal information about you held by us.

We are not obliged to correct any of your personal information if we do not agree that it requires correction and may refuse to do so. If we refuse a correction request, we will provide you with a written notice stating our reasons for refusing.

We will respond to all requests for access to or correction of personal information within a reasonable time.

## 9. Overseas transfers of personal information

From time to time, we may engage service providers located outside of Australia to provide services to us, which may involve your personal information being transferred to locations outside of Australia. For example, we may use cloud-based storage providers to hold your personal information on our behalf in locations outside of Australia, such as the United States.



We also engage with joint venture partners, who may be located outside of Australia, such as in Singapore. As part of these joint ventures, it may be necessary to disclose your personal information to these foreign partners.

By providing your personal information to us, you consent to us disclosing your personal information to any such overseas recipients for purposes necessary or useful in the course of operating our business and agree that APP 8.1 will not apply to such disclosures. For the avoidance of doubt, in the event that an overseas recipient breaches the Australian Privacy Principles, that entity will not be bound by, and you will not be able seek redress under, the Australian Privacy Act.

## 10. Resolving personal information concerns

If you have any questions, concerns or complaints about this Privacy Policy, or how we handle your personal information, please contact our Privacy Officer:

### The Privacy Officer

Address: 255 Sturt Street, Adelaide SA 5000

Telephone: +61 8 8112 6444

Email: [privacy@c-g.com.au](mailto:privacy@c-g.com.au)

We take all complaints seriously and will respond to your complaint within a reasonable period.

If you are dissatisfied with the handling of your complaint, you may contact the Office of the Australian Information Commissioner:

### Office of the Australian Information Commissioner

GPO Box 5218

Sydney NSW 2001

Telephone: 1300 363 992

Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

## 11. Relevant entities

This policy applies to Commercial & General Pty Ltd ACN 600 978 103 and its associated and related entities including but not limited to 88 O'Connell Pty Ltd ACN 640 796 149, C&G DDF Pty Ltd ACN 663 707 122, Tandem Building (SA) Pty Ltd ACN 130 417 088, Tandem Building Pty Ltd ACN 158 494 449, Tandem Building Group Holdings Pty Ltd, Commercial & General Property Services Pty Ltd ACN 126 717 913, Commercial & General Wholesale Office Pty Ltd ACN 161 705 335, C&G Communities Pty Ltd ACN 609 196 170, C&G Health Developer Pty Ltd ACN 623 116 165, C&G Health Project Management Pty Ltd ACN 639 415 035 and C&G Development Management ACN 609 198 567 and each of their subsidiaries (if any).

## 12. Changes

We reserve the right to change the terms of this Privacy Policy from time to time, without notice to you. An up-to-date copy of our Privacy Policy is available via our Websites, or by contacting our Privacy Officer. The last update to this document was in August 2024.

## 13. Document Control

| Date     | Version | Author                                 | Section(s) Modified           | Nature of Amendments / Review  |
|----------|---------|--|-------------------------------|--|
| Oct 2018 | 1.0     | Executive Director,<br>General Counsel | New Policy                    | Creation of Policy   |
| Aug 2021 | 2.0     | Executive Director,<br>General Counsel | Sections 2, 3, 4, 5 and<br>11 | Update of Policy   |
| Aug 2024 | 3.0     | Commercial Director                    | Section 11                    | Update to include Tandem Building and<br>ILOF entities, and new websites |