



Privacy Policy

For the purposes of this website, Brown Property Group includes Greenridge Properties Pty Ltd ACN 129 431 170, its related companies and trusts.

Collection, maintenance and disclosure of certain personal information is governed by the *Privacy Act 1998*, *Corporations Act 2001* and other legislation.

This policy explains how Brown Property Group approaches the collection, storage, maintenance and use of personal information.

Collection of Information

Brown Property Group operates the following businesses:

- property development;
- commercial property investment and leasing;
- shopping centre investment and leasing;

and provides a range of services on behalf of the businesses it manages.

Brown Property Group collects personal information in order to operate the above businesses. The types of personal information collected by Brown Property Group will depend on the particular business you engage with or service you use or request.

Information to be collected from Brown Property Group customers is:

1. where practical, to be collected from the individual concerned; and
2. to be relevant and appropriate for operating the relevant business or providing the relevant service and may include your:
 - name
 - address
 - telephone number
 - email address
 - relevant transactional details
 - tax file number
 - banking information

Personal information may be collected by Brown Property Group in various ways. It may be collected:

- through the internet;
- via a small data file that a website may write to your hard drive ("cookies");
- by registering your details on our website;

- applying for a subscription to a product, service or newsletter;
- reservation forms and contractual documents;
- applications and competition documents;
- through various forms of social media including but not limited to Twitter and Facebook;
- via a marketing survey or questionnaire.

Brown Property Group advises that it also utilises third parties for marketing and digital marketing services and from time to time Brown Property Group may employ third parties to monitor the use of the website and effectiveness of promotions and advertising and also to enable us to improve our service to you.

The information collected by these third parties does not identify individuals (save for any information a “cookie” may contain that you supply) and is anonymous.

Authorised Use and Disclosure of Your Personal Information

The primary purposes of collection of personal information is for entry into a property transaction, to provide you an appropriate service or engage with you for the provision of a service, for communication with our customers or for obtaining feedback for improving our businesses or services.

Brown Property Group uses the personal information collected for:

- the purposes of the particular property transaction or service arrangement; and
- for use within Brown Property Group:
 - to assist determine the most appropriate service provider;
 - to communicate with you by email, by telephone or short message service (SMS) and by mail;
 - for marketing and promotional initiatives;
 - for maintenance of customer registers and sales records.

Brown Property Group endeavours to only use and disclose your information in limited circumstances. Brown Property Group is authorised by you to disclose your personal information to the following third parties:

- our consultants (including but not limited to our legal advisors, banking and finance providers, taxation advisors and accounting advisors and our marketing consultants);
- regulatory authorities (including but not limited to the *Australian Taxation Office, Office of the Small Business Commissioner, Liquor Licensing Victoria* and *Australian Securities and Investments Commission*) where we are required to disclose your personal information by law;
- our agents or contractors (including but not limited to our real estate agent and our principal building and construction contractor);
- our related entities for sales and marketing purposes and for IT and/or administration and/or finance management or support, print and mail services; and
- parties to whom Brown Property Group has outsourced various functions i.e. cleaning and security services, print or mail services.
- Retail builders

Security of Your Personal Information.

Brown Property Group makes every effort to ensure your privacy and personal information is protected from unauthorised access, modification, unauthorised disclosure or loss as required by law. We employ a range of processes and devices to protect the security and confidentiality of your personal information.

The only employees who have access to your personal information are those that require that access for the proper purposes of carrying out their employee tasks.

Brown Property Group does not sell your personal information to any third party marketing or telemarketing agency.

Maintenance, Access and Correction of Personal Information

Brown Property Group has appointed a Privacy Officer who you may contact to:

- review details of your personal information we may hold;
- obtain details of how your personal information may be used;
- request correction of any errors or omissions in your personal information we may hold;
- make a complaint.

The procedure for how any particular request will be handled will be dependent upon the nature of the request made and will be advised to you at the time the request is made. All requests for access to personal information are required to be made in writing. You may direct your request for access to your personal information to the Privacy Officer:

- by mail:

Brown Property Group
PO Box 3131
AUBURN VIC 3123

- by facsimile:
03 9230 2999

- by email
info@bpg.com.au

Should you wish to make a complaint, we request that you do so in writing, however you may also call the Privacy Officer on 03 9230 2900.

Prior to providing you with details of any of your personal information that we may hold, Brown Property Group may require you to provide to our satisfaction sufficient evidence of your identity and to complete a Request for Access form.

Depending on the nature of your request, Brown Property Group may charge a fee for access to your personal information. Particulars of any fees will be provided to you at the time of making the request.

Brown Property Group is authorised to de-identify or delete any personal information that is no longer required by Brown Property Group or is no longer required to be held for any legal requirement.

Modifications to this Privacy Statement

Brown Property Group reserves its rights to modify or amend this Privacy Statement at any time. Any changes to the Privacy Statement will be available on Brown Property Group's website.