

## **Privacy Policy**

This privacy policy was last updated on 24 September 2018.

### **Our privacy commitment**

Arkadia Property Services ABN 48 312 052 913 (**Centre Manager, we, us, our**) is committed to respecting and protecting your privacy. We comply with the Australian Privacy Act 1988 (**Privacy Act**) and the Australian Privacy Principles.

This privacy policy sets out our procedures and policies for collecting, storing and using personal information that you provide us when you visit our shopping centres (each a Centre), use our websites or otherwise interact with us (including via social media and any competitions).

### **What personal information do we collect?**

In the course of our business activities, we may collect certain personal information from individuals including customers, tenants, prospective tenants, service providers and people seeking employment. Personal information includes information that is capable of identifying an individual person, such as your name, contact information, address, and demographic information such as postcode and preferences and interests.

If you are a tenant, prospective tenant or a guarantor, we may collect and use information about previous property transactions and dealings you have had with us. If you apply for employment with us, we may collect your employment history and qualifications.

From time to time, we may also collect sensitive personal information about visitors to the Centre, such as medical information so that we can respond to incidents. Sensitive personal information will only be collected with your consent.

We usually collect personal information because it is provided directly by you to us (including in person, via our website, over the telephone, or via social media), through CCTV footage when you visit the Centre, when entering into commercial or other transactions and arrangements with you (including service agreements and leases) and when you seek employment with us. We may also collect personal information from third parties such as law enforcement agencies and other government entities but only in accordance with the Privacy Act.

### **Use of personal information**

We may collect, store, use and disclose personal information for purposes that include:

- answering enquiries and servicing the needs of our customer and tenants;
- improving services and shopping experiences we provide, including through market research that does not identify individual persons;
- enabling communication with tenants and prospective tenants of the Centres;
- responding to any incidents at the Centres;
- reviewing the range of stores operating within the Centres and considering future retail opportunities;
- providing customers with information about competitions, discounts and store openings;
- carrying out internal functions including training;
- assessing retail tenancy and employment applications; and
- managing and resolving any legal or commercial complaints and issues.

We may also use and disclose information for other related purposes within the reasonable expectations of the person from whom we collected the information, for other purposes required or authorised by law, or in other circumstances with the person's consent.

### **Use of personal information for marketing**

Where you have given us contact information, we may contact you via mail or email to keep you informed of Centre developments and to provide other information related to our business in which we think you may be interested. Personal information is only used for direct marketing purposes where that information was collected for such a purpose or with such a purpose reasonably apparent.

If you do not wish to receive marketing materials from us, you should advise the Privacy Officer or unsubscribe by following the unsubscribe instructions in each of our direct marketing communications. We will act on such a request as promptly as practicable, but we cannot guarantee that the receipt of such materials will cease immediately.

### **Sharing of Personal Information**

We may share certain personal information with third parties including our agents, contractors and service providers (including database server providers, market research companies, and, in relation to tenants which have defaulted on lease, debt collection agencies). We may also disclose personal information to our related companies and their agents, contractors and service providers. If you are a prospective tenant, we share certain information with your business references and nominated guarantors. If you have applied for employment with us, we may disclose certain information to your referees.

We may also disclose personal information to a person or organisation proposing to purchase the whole or part of our business, as well as to law enforcement agencies or government authorities.

Personal information is only shared where it is necessary for the operation of our businesses or to provide services to customers or tenants. We do not, in the usual course of our business, store, process or otherwise disclose personal information outside of Australia. We ensure that, where reasonable, third parties undertake to protect the personal information disclosed to them. Details of our privacy group can be obtained from the Privacy Officer.

If you interact with us through social media, your information may be stored overseas by the providers of the social media platform in countries such as Europe, USA or India. Please refer to the information handling policies of the relevant social media service provider for more information.

We will not sell personal information to external organisations.

### **Information Security**

We hold personal information in electronic or hard copy form. We use reasonable and appropriate measures to protect the personal information we collect from misuse, loss, unauthorised access, modification or disclosure. Safeguards include having controlled premises, secured electronic databases and internet firewalls. We ensure that our employees, contractors and agents are contractually required to maintain confidentiality of all personal information.

If we no longer require your personal information for any purpose detailed in this Privacy Policy and we are not legally required to retain that personal information, we will take all reasonable steps to either destroy or de-identify the personal information.

## **Cookies**

We use data files known as “cookies” on our websites. Cookies cannot be used to identify you and will not give us access to your personal information (other than the information you have chosen to share with us directly). If you wish to avoid cookies you can do so by disabling cookies on your internet browser, however you may not be able to use all our website features.

## **Enquiring about personal information**

You may contact the Privacy Officer if you wish to:

- enquire about any personal information we hold about you;
- change any of your personal information that may be incorrect or out of date;
- make any other enquiry relating to this privacy policy and how we handle your personal information.

The contact details for the Privacy Officer are as follows:

Privacy Officer

Newington Marketplace

Email: [marketing4@arkadia.com.au](mailto:marketing4@arkadia.com.au)

## **Complaints**

If you have any question, concerns or complaints about this privacy policy, or our use of your information, please contact us using any of the above methods. You can also contact us if you believe that the privacy of your information has been compromised or is not adequately protected. Once a complaint has been lodged, we will respond to you within 28 days, although we may request further information for the purpose of considering your complaint. If we will take longer than 28 days to investigate your complaint, we will advise you of the likely response time.

## **Updating this policy**

We may update this privacy policy at any time. A current version will be posted on our websites.