

Contents

1. Overview.....	2
2. Scope and Application.....	2
3. Policy Principles.....	2
3.1 SPG’s approach to collection of Personal Information	2
3.2 How SPG may use and disclose Personal Information	3
3.3 Likely overseas disclosure	5
3.4 How SPG will manage Personal Information.....	5
3.5 Cookies and Related Technologies.....	6
3.6 How individuals may seek access to or correction of Personal Information	10
3.7 Further information.....	11
4. Complaints.....	11
5. Notifiable data breaches	11
6. Privacy Officer	12
7. Responsibility	12
8. Definitions	12
9. Changes to our Privacy Policy.....	14

1. Overview

Satterley Property Group Pty Ltd and its Controlled Entities and Associated Entities (“SPG”) respect the privacy of individuals and are committed to the collection, use, disclosure and management of, and provision of access to, Personal Information in a manner consistent with the standards contained in the Commonwealth *Privacy Act 1988* (the Privacy Act) and the Australian Privacy Principles (APPs).

2. Scope and Application

SPG are bound by the APPs either as a consequence of being an organisation with an annual turnover of more than \$3 million or due to the fact that we derive a benefit, service or advantage by the collection or disclosure of information and opinions about individuals whose identity is apparent or can be ascertained.

This Policy applies to all areas of SPG and associated and controlled entities and all SPG and associated and controlled entity activities. All employees, volunteers, consultants, contractors and agents of SPG must comply with this Policy and SPG’s internal Privacy Guide when collecting Personal Information on SPG’s behalf and when using or dealing with Personal Information in SPG’s possession. Failure to comply with this Policy or the Privacy Management Plan may constitute misconduct and may result in disciplinary action being taken by SPG.

3. Policy Principles

3.1 SPG’s approach to collection of Personal Information

- (a) SPG will not collect Personal Information unless the information is reasonably necessary, or directly related to, one or more of SPG’s functions or activities.
- (b) SPG will not collect Sensitive Information unless:
 - (i) with the individual's consent; or
 - (ii) if required or authorised by Australian law or court/tribunal order; or
 - (iii) an exemption exists under the Privacy Act.
- (c) SPG will collect Personal Information by lawful and fair means and, where possible, directly from the individual. SPG collects Personal Information in various ways including:
 - (i) from correspondence and submitted forms (including via on-line portals, social media sites such as Facebook and our websites);
 - (ii) when you use the SPG website and / or via software, such as cookies and web tracking pixels (also known as “web beacons”);
 - (iii) as part of any registration or subscription process;
 - (iv) direct contact in the course of providing services or administration of SPG activities;
 - (v) from third parties with which SPG collaborates;
 - (vi) from individuals, agents and representatives (eg lawyers, settlement agents, accountants, financial advisers, banks);
 - (vii) from buyers, sellers, lessors, tenants or other users of our services or, alternatively, by potential users of those services;
 - (viii) through publicly available information services (eg social media, local councils, Landgate, telephone white pages, internet records);
 - (ix) when we are required to collect the information by virtue of legal or regulatory requirements (eg the provisions of the *Real Estate and Business Agents Act, 1978*);

- (x) when individuals participate in competitions or surveys conducted by SPG (or third parties, on our behalf) including, but not limited to, surveys relating to the quality of our services provided and surveys relating to real estate matters;
 - (xi) from data bases kept by third parties regarding individual's rental histories;
 - (xii) from other real estate agents (eg when the it is a conjunctional sale of land or when we act for a buyer in a transaction).
- (d) Personal Information collected by SPG may be held in hardcopy format, or electronic format stored on SPG's computing equipment or on third party servers.
- (e) At or before the time (or, if that is not practicable, as soon as practicable after) SPG collects Personal Information about an individual, SPG will take reasonable steps to provide a Privacy Statement to the individual.
- (f) If SPG receives unsolicited Personal Information, and SPG has no lawful basis on which to retain the information, SPG will destroy that information or ensure that it is de-identified.
- (g) If requested to do so, SPG will provide individuals with the option of not identifying themselves, or of using a pseudonym, when dealing with SPG, except where:
- (i) SPG is required or authorised by Australian law or a court/tribunal order, to deal with individuals who have identified themselves; or
 - (ii) it is impracticable for SPG to deal with individuals who have not identified themselves or who have used a pseudonym.

3.2 How SPG may use and disclose Personal Information

- (a) The purposes for which SPG collects, uses and discloses Personal Information will vary depending on the nature of the association between the individual and SPG.
- (i) *Personal Information of employees, job applicants, contractors or volunteers*
- SPG may use this information in assessing applications; administration and management of the employee, contractor, volunteer or titleholder; management of health, safety and wellbeing; fulfilling external reporting requirements; internal planning and development; creating a publicly available staff contact directory.
- In the case of employees and applicants who agree to be added to SPG's recruitment database, the information may be used for follow up contact for future job vacancies.
- SPG personnel names and expertise, and photographs of SPG personnel taken in the course of a SPG activity may be published by SPG for informational, marketing and promotional purposes.
- (ii) *Personal Information of customers, users or attendees of SPG, services, events or activities*
- SPG may use this information for the provision of the facilities or services; administration and monitoring of the use or attendance; internal planning and development; ensuring the security of SPG facilities or premises; promoting other SPG events or activities. In particular:

- a. we collect information to enable us to provide services in connection with the sale and/or leasing of properties and/or businesses;
 - b. we collect information to provide advice to customers and prospective customers with respect to real estate and/or business agency matters;
 - c. we collect information to enable us to provide services in relation to conveyancing and property settlement;
 - d. we obtain information from Landgate, to assist us in the valuing, selling and/or leasing of properties and/or businesses;
 - e. we collect information to assess applications for residential and commercial tenancies;
 - f. we obtain information to assist us with marketing the services of the agency;
 - g. we collect information to enable us to advise our clients of additional information or services supplied by us (or by third parties) that may be of interest to them;
 - h. we provide personal information to our contractors, who provide us with services to assist us with conducting our business;
 - i. we collect information to enable us to efficiently manage our business;
 - j. we collect information to assist with our delivery of services via the internet, including social media sites such as Facebook;
 - k. we provide information to the Real Estate Institute of Western Australia (Inc) and other providers of real estate internet services to enable us to market properties, promote our services and conduct our business through the internet;
 - l. to send marketing communications to you, including by way of email, phone call, short message (SMS) communication or via online and / or targeted advertising ; and
 - m. we collect information for research and statistical purposes.
- (b) If SPG collects or discloses Personal Information other than for those purposes stated above, such other purposes will be notified to the individual in a Privacy Statement.
- (c) Apart from where you have consented or disclosure is necessary to achieve the purpose for which it was submitted, personal information may be disclosed in special situations where we have reason to believe that doing so is necessary to identify, contact or bring legal action against anyone damaging, injuring, or interfering (intentionally or unintentionally) with our rights or property, users, or anyone else who could be harmed by such activities. Also, we may disclose personal information when we believe in good faith that the law requires disclosure.
- (d) Other than the purposes stated above or in a Privacy Statement, SPG will only use or disclose Personal Information for purposes which are in reasonable contemplation or are permitted under the Privacy Act.
- (e) SPG may disclose Personal Information to the following types of third parties:
- (i) Government departments and agencies to satisfy reporting requirements;
 - (ii) SPG's Controlled Entities, to the extent such Personal Information is required by the Controlled Entity to provide services to SPG or undertake activities for SPG;
 - (iii) external service providers, to the extent such Personal Information is required for the service provider to provide services to SPG (e.g. mailing house services; email services; externally hosted software and databases; surveys); and
 - (iv) collaborating parties, to the extent such Personal Information is required for the collaborative activity to be undertaken.

- (f) In relation to use of our website, we may establish relationships with business partners that allow visitors to our website to link directly to sites operated by these partners. Some of these sites may be "co-branded" with our logo; however, these sites may not be operated or maintained by or on our behalf. These sites may collect personal information from you that may be shared with us. This Privacy Statement will apply to any personal information we obtain in this manner. We are not responsible for the content or practices of websites operated by third parties that are linked to our sites. These links are meant for the user's convenience only. Links to third party sites do not constitute sponsorship, endorsement or approval by us of the content, policies or practices of those third party sites. Once you have left our site via such a link, you should check the applicable privacy policy of the third party site.

Generally SPG has taken steps, and will continue to take steps, to ensure that and/or encourage any domestic third parties it has dealings with to comply with the Privacy Act and the Australian Privacy Principles when collecting, holding or using personal information provided to them by SPG.

- (g) SPG will not use Personal Information for the purpose of direct marketing unless such use is contemplated under Policy Principle 3.1(a) or SPG has obtained consent from the individual. The area of SPG issuing the direct marketing will ensure the direct marketing communication contains a simple means by which the individual may easily opt out of receiving direct marketing communications from that area of SPG.

3.3 Likely overseas disclosure

It is not standard practice for SPG to disclose personal information to overseas recipients. However, there is a possibility that on occasion your personal information may be disclosed to an overseas recipient. The location of any potential recipients will vary depending on the project or purpose concerned. Should you have any queries about the potential disclosure of your personal information to an overseas recipient, please contact our privacy officer set out at the end of this document.

Cloud servers

Indirect overseas disclosure may occur as we back up collected information on a cloud based system provided by a third party data storage provider, as SPG and the entities to which it discloses your personal information may, from time to time, utilise cloud-based computing services. In such cases, personal information may be disclosed to hosting entities overseas. As a result, SPG will not disclose personal information to entities without a privacy policy meeting or exceeding the standard of stringency contained in this Privacy Policy.

3.4 How SPG will manage Personal Information

- (a) SPG will take such steps as are reasonable in the circumstances to:
- (i) ensure that Personal Information it collects is accurate, up-to-date and complete;
 - (ii) ensure that Personal Information SPG uses or discloses is, having regard to the purpose of the use or disclosure, accurate, up-to-date, complete and relevant;
 - (iii) protect Personal Information in its possession from misuse, interference, loss, and unauthorised access, modification or disclosure;
 - (iv) destroy or de-identify Personal Information if the Personal Information is no longer needed or required to be retained under any law, regulation or code applicable to SPG.

3.5 Cookies and Related Technologies

COOKIES

A cookie is a simple text file stored on your computer or device's browser. Many cookies from websites will be visible from your browser. You will usually find information on cookies and how to manage them under the "Options" or "Setting" tab in your browser.

There are several different types of cookies (some of which are used on SPG's website):

- (a) **First party cookies** – A first party cookie is sent from a website to your web browser when you visit that site. This is how websites "record" or "remember" things like customised settings (such as your location) and your log in details.
- (b) **Temporary cookies** – Temporary cookies generally only last for one browsing session (until you close your web browser).
- (c) **Persistent cookies** – Persistent cookies remain on your computer after you close your browser and will be sent back to the applicable website each time you visit it.
- (d) **Third party cookies** - Third party cookies are sent by businesses that provide content, such as advertising, on websites that you visit. Many websites feature advertising from third parties and those third parties may use cookies to track your browsing activities. They will normally use this information to "show" you targeted advertising – that is, advertising relating to products or services they think you will be interested in based on your prior web searches.
- (e) **Tracking / web pixels** - Tracking pixels are clear picture files used to keep track of your navigation through a single website or series of websites. Tracking pixels are normally used by websites that use third party traffic monitoring and traffic services.
- (f) **"Flash cookies"** – Flash cookies contain more information than the other kinds of cookies referred to above and are not generally cleared when you clear cookies in your web browser.

Why and how does SPG use cookies?

Generally, we use cookies to learn about the way you interact with SPG's content and to help us to improve your experience when visiting the website. We may also use cookies to target specific advertising to you.

SPG may record your visit through the use of cookies and may log information including your server address, the date and time of your visit to the website, the pages accessed and documents downloaded by you, the previous site(s) visited by you, the lot(s) you have viewed and the type of browser used by you. Any information collected via cookies will be used and disclosed in accordance with this Privacy Policy.

Most of the information collected by cookies will not be sufficient to identify you – this is because the information collected will be very "general" in nature. Information collected via

cookies will only be deemed to be “personal information” for the purposes of the Privacy Act and the APP’s if it makes you or any other individual reasonably identifiable.

SPG will not facilitate the merging of personally-identifiable information with non-personally identifiable information collected through cookies, tracking / web pixels or Google or Facebook advertising products or features, unless it has your consent to that merger.

Third Party Cookies

Third party cookies are sent by different entities (such as businesses which provide advertising content) to the owner of the website you are visiting – so in this instance, this means by entities other than SPG.

Third party cookies are used on SPG’s website to enable remarketing and reporting for impression assisted visits, website conversions, user demographics and user interests. The third party cookies used on the SPG website include (but are not limited to:

(a) **Google Analytics** – SPG uses Google Analytics, a web analytics service provided by Google Inc. SPG uses Google Analytics to:

- i. measure and analyse information regarding your visits to the SPG website - including information such as age, gender and conversion metrics; and
- ii. decide what information and features should be included on the website to increase the efficiency of the website.

Google Analytics uses first party cookies and JavaScript code to gather statistics about how SPG’s website is accessed. It anonymously tracks how our visitors interact with the website, including which website they came from previously and what they did on the site. The information generated about your use of the website (including your IP address) will be transmitted to and stored by Google on servers located outside of Australia.

Google will use the information transmitted to it for the purposes of evaluating your use of our website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may transfer this information to third parties where it is required to do so by law or where such third parties process the information on Google’s behalf.

(b) **Google Display Network Advertisements** – SPG uses Google Display Network Advertising to advertise online. This involves SPG and third party entities, including Google, showing SPG advertisements across the internet. SPG and those third party entities use first party cookies (such as the Google Analytics cookie) and third party cookies together to:

- i. inform, optimise and serve advertisements based on past customer and client visits to the SPG website; and
- ii. report on how SPG advertisement impressions, other uses of advertisement services and interactions with these advertisement impressions and advertisement services are related to visits to the SPG website.

(c) **Jett Interactive for call tracking** - This cookie is used to enable SPG to track and measure the success of its campaigns and advertising by tracking calls generated by online lead sources such as search engines, affiliate sites, social media campaigns and offline campaigns. The cookie tracks the phone calls SPG receives back to the keyword(s) and source(s) that generated each call in the first instance.

The call tracking process works by generating unique phone numbers to track the overall effectiveness of a campaign. For example, if a given SPG marketing campaign consisted of web advertisements and radio advertisements, each marketing channel would be assigned a different phone number so that SPG would be able to measure the volume and quality of calls generated by the advertisements.

- (d) **LiveChat – online / website chat tool** - LiveChat allows SPG to chat in real time with visitors to the SPG website. It uses visitor tracking cookies and software to enable SPG to run the chat tool, to know which website the website visitors came from and to track website visitors as they move through the SPG website in real time.

This information is used by SPG to help it assist its' customers online and to enable it to understand traffic patterns on the SPG website.

- (e) **Tracking codes** - The SPG website also features or uses 2 general tracking codes which are managed through Google Tag Manager. Some of the consultants and advertising agencies used by SPG use the tracking codes to provide SPG with advertising features and services, general marketing advice and information and to facilitate retargeting or re-marketing.

The tracking codes are cookie based technologies which use simple Javascript code to anonymously "follow" SPG website visitors as they travel around / on the internet. The tracking codes work as follows: every time a new visitor comes to the SPG website, the code "drops" an anonymous browser cookie. Later, when the "cookied" visitor browses the internet, the cookie will let SPG's retargeting provider(s) know when to serve advertisements, ensuring advertisements are served only to people who have previously visited the SPG website.

How can I manage, reject and / or delete cookies?

If you do not want information about you to be collected through the use of cookies, there is a simple procedure in most browsers that allows you to deny or accept the cookie feature. You should note that cookies may be necessary to provide you with features or functions on the SPG website and on other websites.

SPG sometimes links to or embeds content from other websites and entities such as Facebook and YouTube. SPG does not control the dissemination of third party cookies from these websites. In order to manage, reject or delete third party cookies, you will need to refer to the privacy policies of the relevant third party website(s).

If you want to control or opt out of the operation or application of Google Analytics, you should refer to Google's guide(s) on opting out of those features at <http://www.google.com/intl/en/policies/privacy>.

SOCIAL MEDIA

When you browse and make use of SPG's social media pages (such as Facebook), you are using an external site and are therefore subject to the privacy policies and practices of that site. If you have any questions or concerns regarding that site's privacy policies and practices, you should review the privacy policy of the relevant site.

SPG records all information posted to its social media pages and uses that information for the purposes of administering the pages, for record keeping, for considering and / or addressing

any comments made and running campaigns and promotions. No attempt will be made to further identify social media subscribers except where requested and authorised by law.

FACEBOOK LEAD ADVERTS

Facebook Lead Adverts are adverts that:

- (a) make it easy for potential customers or clients to sign up for what an entity is offering or marketing or to express an interest in what an entity is offering or marketing; and
- (b) enable entities to receive accurate contact information from potential customers or clients in order to follow them up and / or to discuss those goods and services with them.

When a prospective customer or client (like you) clicks on a Lead Advert, rather than being taken to a landing page (the page for the entity to which the advertisement relates), a form opens up in which the client or customer can enter their contact information. Facebook pulls information from the potential customer or client's Facebook profile and uses that information to automatically fill out as many of the fields in the form as possible with information from the user's profile (such as name, email address and phone number).

The information populated in the form is not sent to SPG until the user clicks "submit". This means that the client or customer's personal information will not be provided to SPG until that prospective customer or client gives their express approval or consent.

Facebook Lead Adverts also enable SPG to:

- (a) re-market projects and services to customers who have previously engaged with, contacted or purchased products or services from SPG or expressed interest in SPG products or services. This is achieved by:
 - i. SPG uploading customer and client email addresses to Facebook;
 - ii. Facebook matching those email addresses with existing Facebook accounts; and
 - iii. Facebook sending SPG advertisements to those parties.
- (b) contact or find potential "look-alike" customers or clients. This involves:
 - i. SPG uploading customer and client email addresses to Facebook;
 - ii. Facebook looking at the profile data of the existing clients and customers and then creating a new list of Facebook users that share similar interests and demographics; and
 - iii. Facebook sending SPG advertisements to those parties.

It is important to note that the potential "look-alike" customers and clients will not be contacted by or marketed further to by SPG unless they choose to fill in a form generated by clicking on the Lead Advert.

If a prospective customer or client submits personal or sensitive information to SPG through a Lead Advert, that information will be collected, managed and disclosed in accordance with this Privacy Policy, the Facebook Platform Policy, the Facebook Advertising Policies, the Privacy Act and the APPs.

Any personal or sensitive information collected will not be shared with third parties, except for contractors or agents engaged by SPG to facilitate SPG's access to and use of Facebook Lead Adverts. Those parties will be required to manage the information transmitted or provided to them in accordance with this Privacy Policy, the Privacy Act and the APPs.

Any personal or sensitive information collected through Facebook Lead Adverts will only be used by SPG to provide the applicable client or customer with relevant information in relation to the particular advertisement, project or service advertised.

3.6 How individuals may seek access to or correction of Personal Information

(a) Pursuant to the APPs, individuals have certain rights to obtain access to personal information held by us with respect to that individual. Subject to the relevant exemptions contained in the APPs and subject to an individual providing sufficient proof of his or her identity SPG will provide access to information that it holds relating to an individual. SPG reserves the right to charge a fee for the provision of this information based on the administrative cost of supplying the information requested. Further details as to these costs and the ability to access information held by us can be obtained by contacting our Privacy Officer.

(b) The procedure for employees to request access is set out in the Internal Privacy Guide.

(c) Other individuals who desire access to Personal Information about themselves held by SPG must submit a request to:

The Privacy Officer
Satterley Property Group Pty Ltd
PO Box 1346
WEST PERTH, WA 6872
Email: privacy@satterley.com.au

(d) We will generally provide access to information by providing the individual concerned with copies of relevant documents. Where, for reasons of volume or otherwise, providing copies of documents is not practical, we will make arrangements for the individual concerned to attend at our offices to carry out a physical inspection.

(e) Wherever possible, we will provide copies of documents or access to the information that we hold with respect to an individual within 14 days of the receipt of the relevant request. In the case of more complex requests we will endeavour to provide access to the information within a period of 30 days.

(f) SPG encourages individuals with whom SPG has regular dealings to notify SPG of any changes to their Personal Information.

(g) If individuals believe that information held by SPG relating to them is incorrect they are entitled to request, by contacting our Privacy Officer, that SPG correct that information.

(h) If individuals do not disclose changes or update their Personal Information, this may affect SPG's ability to administer records or provide services for those individuals.

(i) SPG encourages employees, to use self-serve systems provided by SPG to update their Personal Information. Other individuals may submit a request to SPG to correct or

update Personal Information about them held by SPG. Requests must be submitted as follows:

Requestor	Submit request to:
Employee	Human Resources / Payroll
Others	The area of SPG to which the individual provided their Personal Information

- (j) SPG will respond to requests for correction within a reasonable period after the request is made and will not impose any charges for the request. If SPG believe they are entitled to refuse to make the requested correction, SPG will provide the individual with a written notice setting out the reasons for refusal. Individuals who are dissatisfied with the decision may apply in writing for a review. Requests for review will be referred to the Privacy Officer.

3.7 Further information

- (a) Should any person wish to obtain further information with respect to the type of personal information we hold, the purposes for which we use that information and/or the way in which we manage that information, please contact our Privacy Officer at the contact details set out above.

4. Complaints

If an individual believes that their Personal Information has not been handled by SPG in accordance with this Policy, the individual may make a complaint in writing or by email to:

The Privacy Officer
PO Box 1346
WEST PERTH, WA 6872
Email: privacy@satterley.com.au

- (a) To enable prompt processing, individuals are encouraged to lodge complaints within six months of the individual becoming aware of the conduct the subject of the complaint.
- (b) Complaints will be processed in a reasonable time (usually 30 days from the date on which the complaint was received). Individuals will be advised in writing of SPG's decision and any action taken.
- (c) SPG will comply with any applicable mandatory data breach notification requirements.

5. Notifiable data breaches

We are committed to protecting information we hold about you, and to compliance with the Notifiable Data Breaches scheme. Where we become aware of a potential data breach which is likely to result in serious harm to any individuals about whom we hold information, we will:

- investigate the suspected breach and determine the scope of any breach that has occurred and the risk of harm to affected individuals whose information may have been compromised;
- notify you and the Privacy Commissioner of the potential breach; and
- take steps to minimise any harm caused to affected individuals as a result of the breach.

6. Privacy Officer

(a) Our designated Privacy Officer is:

Name:	Amy Welch
Email:	privacy@satterley.com.au
Telephone:	08 9368 9000

We, through our Privacy Officer, are happy to provide further details as to the extent to which we are required to comply with the APPs should any person wish. Alternatively, further details of the obligations imposed upon organisations under Australia's privacy laws can be obtained directly from the Office of the Australian Information Commissioner (Commissioner) or by reference to the APPs and the Commissioner's associated guidelines at www.oaic.gov.au.

7. Responsibility

The Privacy Policy principles must be adhered to by all SPG Personnel.

8. Definitions

Associated Entity has the same meaning as in section 50AAA of the Corporations act 2001.

Australian Privacy Principles are contained in the Privacy Act.

Controlled Entity has the same meaning as in section 50AA of the Corporations Act 2001.

Personal Information is defined in the *Privacy Act 1988* (Cth) as 'information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether true or not and whether recorded in a material form or not.' The types of Personal Information that SPG collects and holds will depend on the circumstance and relationship between the individual and SPG. Personal Information that is commonly collected by SPG includes:

- a. name
- b. address (residential, postal and email)
- c. phone number
- d. date of birth
- e. gender
- f. passport number
- g. banking and credit card details
- h. tax file number
- i. emergency contact details
- j. photographs or video recordings (including CCTV footage)
- k. criminal history
- l. academic record
- m. IT access logs
- n. records of donations and transactions
- o. occupation details, and other personal information provided by individuals to SPG or our service providers in acquiring, using or subscribing to our services;
- p. financial information such as assets and liabilities, income and expenses, credit reference information and credit card/banking details;
- q. property valuations and details of properties obtained to make, analyse and/or assess those valuations;

- r. databases of comparable sales of properties and/or businesses to appraise the value of other properties and businesses and to assist in the marketing of those properties and businesses;
- s. information used with respect to the marketing, sale and/or leasing of real estate properties and/or businesses;
- t. information from sellers, buyers, lessors and/or tenants and potential sellers, buyers, lessors and/or tenants of properties and/or businesses;
- u. details of properties, owners and tenants used for the purpose of managing the leasing of both commercial and residential properties; references associated with tenancy applications;
- v. data obtained from third parties regarding lease applicants' rental histories;
- w. data obtained from third parties for use when marketing, selling and leasing real estate properties and businesses.

Privacy Act means the *Privacy Act 1988* (Cth).

Privacy Management Plan means SPG's Privacy Management Plan and consists of the SPG's Privacy Policy and Internal Privacy Guide. These two documents should be considered together and detail the practices, procedures and systems SPG have implemented to ensure compliance with their Privacy responsibilities.

Privacy Statement means a notification to an individual at or before the time (or, if that is not practicable, as soon as practicable after) SPG collects Personal Information, that addresses the following points, as are reasonable in the circumstances:

- (a) the full name of SPG and the contact details of the area of SPG responsible for the collection of the individual's Personal Information;
- (b) the purposes for which the individual's Personal Information is collected;
- (c) any law that requires the individual's Personal Information to be collected;
- (d) any third parties to which SPG may disclose the individual's Personal Information and whether any such party is located overseas;
- (e) any consequences for the individual if all or part of the Personal Information is not provided;
- (f) that SPG's Privacy Policy is available on SPG's website.

Sensitive Information is defined in the *Privacy Act 1988* (Cth) as:

- (a) information or an opinion about an individual's:
 - (i) racial or ethnic origin; or
 - (ii) political opinions; or
 - (iii) membership of a political association; or
 - (iv) religious beliefs or affiliations; or
 - (v) philosophical beliefs; or
 - (vi) membership of a professional or trade association; or
 - (vii) membership of a trade union; or
 - (viii) sexual orientation or practices; or
 - (ix) criminal recordthat is also Personal Information;
- (b) health information about an individual; or
- (c) genetic information about an individual that is not otherwise health information; or
- (d) biometric information that is to be used for the purpose of automated biometric verification or biometric identification; or
- (e) biometric templates.

SPG Personnel means employees, titleholders, consultants, contractors and volunteers.

9. Changes to our Privacy Policy

This document sets our current Privacy Policy. This policy will be reviewed from time to time and will be maintained in an up-to-date form. Any changes to this policy will be posted on the relevant section of our website.



NIGEL SATTERLEY
Chief Executive Officer

Date: 13 May 2022.