# **Privacy Policy**

## 1. Respecting your privacy

Banna Property Group is committed to compliance with privacy laws which apply to its businesses and which set out standards for the management of personal information.

This policy outlines our personal information management practices. Specifically

- the kinds of personal information we collect and hold;
- how we collect and hold it:
- the purposes for which we collect, hold, use and disclose it;
- your right to access and seek correction of it;
- how you may complain about privacy matters; and
- our sharing of your personal information overseas.

## 2. What kinds of personal information do we collect and hold?

The personal information we collect and hold is what is reasonably necessary for our business functions and activities. When we collect and hold personal information, it is of the following kinds:

- your personal details such as your name, addresses, telephone numbers, age and gender;
- whether you have a connection with others whose personal information we may collect or hold;
- what, how and when you have expressed an interest in shopping in our centre's;
- your stated or likely preferences, for example whether you may be interested in particular marketing campaigns or promotions.

Depending on the nature of your dealings with us, we may collect and hold other types of personal information. For example, information collected and held via our secure financial systems about the debit or credit card you might use for your purchases from us.

You generally have the option of not identifying yourself or of using a pseudonym when dealing with us.

#### 3. How do we collect and hold personal information?

Collection of personal information: When we collect personal information about you, we do so by making a record of it. We do this when:

- -you communicate with us online;
- -you take part in our promotions, competitions, testimonials, surveys and focus groups;
- you deal with us in other ways involving a need for personal information to be provided such as when you contact one of our centre managers or bring a claim against us.

When you visit our websites, social media pages or mobile applications or click on our advertisements on the online media of other companies, we may collect information about you using technology which is not apparent to you, for example "cookies".

Most of the personal information we collect and hold about you is from your direct dealings with us. We may sometimes collect your personal information other than from you directly. For example from other suppliers who, in common with us, have a relationship with you.

Holding of personal information: Personal information we hold is generally stored in computer systems. These may be operated by us or by our service providers. In all cases, we have information security requirements aimed at eliminating risks of unauthorised access to, and loss, misuse or wrongful alteration of, personal information.

#### 4. Why do we collect, hold, use and disclose personal information?

When we collect, hold and use your personal information, we do so primarily to sell and promote our services to you and to improve on the range of our offerings. For example:

- to learn of your likely preferences so that we may promote our services to you in a way which may be of most interest to you; and
- to assist in investigating your complaints and enquiries.

We disclose personal information we collect for purposes which are incidental to the sale and promotion of our services to you. For example, we may disclose your personal information within our group, to service providers who assist us in our day-to-day business operations and as part of buying or selling businesses.

We may collect, hold, use and disclose your personal information for other purposes which are within reasonable expectations or where permitted by law.

When marketing to you, your personal information is only ever used or disclosed for Banna Property Group's own purposes. You may opt out of our direct marketing to you. Our direct marketing materials will tell you how to do this.

We may de-identify your personal information. We may do this for use and disclosure of the anonymous data to determine preferences and shopping patterns.

## 5. How can you enquire about, access and correct your personal information?

Access: We will provide you with access to any of your personal information we hold (except in limited circumstances recognised by law). If you wish to access your personal information or have an enquiry about privacy, please contact our office at:

info@banna.com.au or by calling us on 9804 6066.

Alternatively, you can write to us at:

Banna Property Group Suite 102, 160 Rowe Street Eastwood NSW 2122 Before we provide you with access to your personal information we may require some proof of identity. We may charge a reasonable fee for giving access to your personal information if your request requires substantial effort on our part.

Correction: If you need to correct your personal information, please contact our office at one of the above contact points.

### 6. How can you complain about our management of personal information?

If you wish to complain about a breach of the privacy rules that bind us, you may contact our office at one of the above contact points. We may ask you to put your complaint in writing and to provide details about it.

We may discuss your complaint with our personnel and our service providers and others as appropriate.

Our office will investigate the matter and attempt to resolve it in a timely way. Our office will inform you in writing about the outcome of the investigation. If our office does not resolve your complaint to your satisfaction and no other complaint resolution procedures are agreed or required by law, our office will inform you that your complaint may be referred to the Privacy Commissioner for further investigation and will provide you with the Commissioner's contact details.

## 7. Updates

This privacy policy is current at the date below. We may change it periodically. If we propose to change this policy, we will display at least 2 weeks' prior notice of the change on www.banna.com.au.

#### 8. More information

More information about privacy law and privacy principles is available from the Privacy Commissioner. The Privacy Commissioner may be contacted at <a href="www.oaic.gov.au">www.oaic.gov.au</a> (email - <a href="mailto:enquiries@oaic.gov.au">enquiries@oaic.gov.au</a>) (Australia).

Last update of this policy: 15 September 2014