

Hindmarsh Privacy Policies

HINDMARSH GENERAL PRIVACY POLICY

Hindmarsh is committed to the protection of your personal information. Our policies comply with our obligations under the Australian Privacy Principles that form part of the Privacy Act 1988 (Cth) and are intended to protect your privacy in respect of any personal information that you may provide to us.

Members of the Hindmarsh Group may collect personal and other information in the circumstances set out below. We refer to each of these entities in this policy as "us", "we", or "Hindmarsh".

Personal Information Hindmarsh Collects and Why

Hindmarsh collects information from customers and clients in several different ways. These generally include the following:

- Purchasers of properties through our development group.
- Residents in our retirement villages.
- Contracting parties in our construction activities.
- Investors in funds managed by Hindmarsh Capital.
- Through marketing activities.

In addition to the purposes set out above, this information may be used by Hindmarsh in connection with the management of the Hindmarsh businesses generally, and may be provided to law enforcement and government bodies, insurers, Hindmarsh employees and subcontractors, and third parties who provide Hindmarsh with services from time to time for these purposes.

Additionally, Hindmarsh also conducts certain online activities through the Hindmarsh websites, and associated sites managed by members of the Hindmarsh Group. The collection of personal information through these activities and information associated with the Hindmarsh websites is dealt with in the Hindmarsh Online Privacy Policy, which can be found below.

Suppliers

If you, or a company you work for, supplies goods or services to Hindmarsh, Hindmarsh may collect personal information about you in connection with the provision of those goods or services, either directly from you or from that company. This information may include your name, date of birth, contact information, and any other information you provide, or provided on your behalf, as part of our compliance processes. This information will be used for the purposes of managing the provision of those good or services.

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Employees

If you apply for employment and/ or are employed by a member of the Hindmarsh Group, Hindmarsh may collection personal information about you in connection with your employment. This information may include your name, date of birth, contact information, qualifications, work history, reference checks and any other information you provide, or provided on your behalf, as part of our recruitment and compliance processes.

Sometimes we may need to collect and hold sensitive information about you to determine your suitability for employment (e.g. pre-employment medical information or your criminal history). This information will only be collected and held with your consent.

This information will be used for the purposes of managing your employment, in accordance with the requirements of the Privacy Act 1988 (Cth). You need to ensure this information is up to date, in accordance with Hindmarsh's policies and procedures.

Unsolicited Information

If we receive personal information about you that we did not ask for either directly from you, from someone on your behalf, or through someone on our behalf, and we determine that we could have collected this information from you had we asked for it, we will take reasonable steps to notify you, as soon as practicable, that we have collected your personal information. If we could not have collected this personal information, we will lawfully de-identify or destroy that personal information. Any unsolicited information provided by you, someone on your behalf or someone on our behalf, will be used for the purposes for which it was provided.

Other Personal Information Collected

We may also collect the following information from you:

- the fully qualified domain name from which you accessed our websites, or alternatively, your IP address;
- the date and time you accessed each page on our websites;
- the URL of any webpage from which you accessed our websites (the referrer);
- cookies which track your visits to our web sites; and
- the web browser that you are using and the pages you accessed.

We use this information so that we can tell which pages are the most popular. We use this information to improve our website. If this information is linked with personal information, we hold about you as set out above, this information becomes personal information and will be treated in the same manner as the personal information to which it has been linked.

Who Collects the Personal Information?

Personal information collected about individuals (as described above) may be collected by, or on behalf of members of the Hindmarsh Group.

Information may also be collected by Hindmarsh on behalf of other people as set out in notices given to individuals, or consents given by individuals, at or prior to the time the personal information is collected.

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How your Personal Information is Stored and Kept Secure

All personal information collected by Hindmarsh is held securely, whether on Hindmarsh's physical files, in Hindmarsh's computer systems or in a database (which may be hosted by Hindmarsh or a third party on Hindmarsh's behalf). This information is only made available to Hindmarsh employees on a 'need to know' basis or to other people as outlined in this policy who have agreed to treat that information confidentially. These databases are protected by a firewall as well as host-based security. Your personal information may be transmitted over the Internet once it has been stored in a database and may also be transferred across borders to recipients in foreign countries, including the USA, and may be stored on servers, using databases or via cloud technology in a number of countries other than Australia, including regions such as the USA, where doing so is part of Hindmarsh's ordinary business practices relating to the storage of data and where permitted by law.

If Hindmarsh ever has a requirement to transmit such data over the Internet (e.g. to make an off-site back up) it will be in encrypted form. By providing us with your personal information, you consent to these transfers.

We will use all reasonable endeavours to keep your personal information in a secure environment, however, this security cannot be guaranteed due to the nature of the internet. These measures are designed to assist in your personal information not being accessed by unauthorised personnel, lost or misused. If you reasonably believe that there has been unauthorised use or disclosure of your personal information please contact us (refer to General Information below).

All reasonable steps are taken by us to ensure that your personal information held by us is accurate, complete and up to date. If you believe that any of your personal information is inaccurate, please contact us (refer to General Information below) and we will take all reasonable steps to correct it within a reasonable timeframe.

Disclosing your Personal Information

We understand how important it is to keep your personal information private, so we will disclose personal information we have about you only in certain specific circumstances, when:

- you agree to the disclosure;
- we use it for the purposes we collected it; or
- disclosure is required or authorised by law.

To the extent permitted by law, we may also disclose information about you to:

- third parties who provide services to Hindmarsh from time to time;
- government agencies as part of our statutory obligations, or as otherwise permitted by law.

Right of Access to your Personal Information

You have the right to access, update and correct your personal information held by us. We will take reasonable steps to ensure that personal information is up-to-date, accurate and complete.

If you wish to access, update or correct your personal information held by us, please contact us (refer to General Information below).

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HINDMARSH ONLINE PRIVACY POLICY

Online Information Collected and Why

When you access Hindmarsh.com.au, or an associated site (Site), including when you use services offered by the Site (e.g. subscribing to Hindmarsh's MyProperty service) we may ask for:

- your name;
- your email address; and
- in certain circumstances, your telephone number or address.

On the Site we invite you to:

- view properties available in our residential and retirement projects;
- set up access to the MyProperty Site;
- submit your resume to us for consideration of job vacancies.

We collect this information in order to facilitate your access to the Site and the functionality provided by the Site. If you do not provide us with this information, we may not be able to provide you with access to all or part of the Site or functionality offered through the Site. If you submit your resume to us, we will keep it in a database for consideration of jobs that arise within Hindmarsh.

We update the information we hold about you (e.g. your Resume) when you provide, or we receive, new information about you.

Other Online Information Collected

We may also collect the following information during your visit to the Site:

- the fully qualified domain name from which you accessed our Site, or alternatively, your IP address;
- the date and time you accessed each page on our Site;
- the URL of any webpage from which you accessed our Site (the referrer);
- cookies which track your visits to the Site;
- the web browser that you are using and the pages you accessed.

We use this information so that we can tell which pages are the most popular. We use this information to improve our site. If this information is linked with personal information we hold about you, as set out above, this information becomes personal information and will be treated in the same manner as the personal information to which it has been linked.

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How your Online Information is Stored and Kept Secure

Information held about you (e.g. your access to the MyProperty site) is held in a database. The database is protected by a firewall as well as host-based security. [Your personal data may be transmitted over the Internet once it has been stored in the database and may also be transferred across borders to foreign countries, where doing so is part of Hindmarsh's business practices relating to the storage of data and where permitted by law]. If Hindmarsh ever has a requirement to transmit the data over the Internet (e.g. to make an off-site back up) it will be in encrypted form. If you provide us with additional information to verify your identity, we will destroy the copies of the documents you provide to us after we have successfully verified your identity.

External Links on Hindmarsh Websites

Hindmarsh may allow links to external bodies or entities (e.g. charities supported by Hindmarsh) on its Site from time to time. Once you have clicked on a link and have left the Site, our privacy policy no longer applies. You must read the privacy policy of the subsequently visited site to see how your personal information will be handled on those sites.

Disclosing your Online Information

We understand how important it is to keep your personal information private, so we will disclose personal information we have about you only in certain specific circumstances, when:

- you agree to the disclosure;
- we use it for the purposes we collected it; or
- disclosure is required or authorised by law.

We may also disclose information about you to:

- third parties who provide services to Hindmarsh from time to time; and
- law enforcement and government agencies as required from time to time.

Unsolicited Emails

You will only receive emails from Hindmarsh if:

- You subscribe to our MyProperty service;
- You request information about our services when you choose to contact us. You will not be added to a mailing list of any kind and will only receive e-mail in the matter that you have contacted us about;
- You provide your details and request that we contact you when you send us your resume; or
- They are otherwise relevant to the reasons for which we hold your email address, where we are permitted to do so by law.

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Cookies and What They Are Used For

A cookie is a text file placed into the memory of your computer by our computers. A copy of this text file is sent by your computer whenever it communicates with Hindmarsh.com.au.

Hindmarsh uses cookies to identify you between multiple visits, to better understand how Hindmarsh.com.au is used.

We may provide the information we gather from cookies to third parties for these purposes and for other purposes connected with Hindmarsh.com.au.

If cookie information is linked with personal information, we hold about you as set out above, this cookie information becomes personal information and will be treated in the same manner as the personal information to which it has been linked.

GENERAL INFORMATION

What steps are required if something goes wrong?

Please contact us by email or by phone, if you believe:

- someone has gained access to your personal information by mistake;
- we have breached our privacy obligations or your privacy rights in any way;
- you would like to discuss any issues about our privacy policy.

We will aim to satisfy any privacy questions that you have and correct any errors on our part. If you still have concerns please contact our Company & Legal Secretary by email on privacy@hindmarsh.com.au, or by phoning (+61 2) 6129 1500.

Changes to our Privacy Policies

These privacy policies relate to our current privacy standards. We may vary our privacy policy from time to time. We will notify you of any changes by publishing the latest policy from time to time at www.Hindmarsh.com.au.

Further Information regarding Australian Privacy Legislation

If you would like further information relating to the Australian Privacy Legislation and the Australian Privacy Principles, please visit www.privacy.gov.au.

Hindmarsh Point of Contact

Please contact Hindmarsh's Legal & Company Secretary if you believe:

- someone has gained access to your personal information by mistake;
- we have breached our privacy obligations or your privacy rights in any way; or
- you would like to discuss any issues about our privacy policy.

You can contact Hindmarsh's Legal & Company Secretary on (ph.) (+61 2) 6129 1500, via email at privacy@hindmarsh.com.au, or in writing to: Legal & Company Secretary, Hindmarsh Group, 65 Constitution Avenue, Campbell ACT 2612.

VERSION HISTORY

Version	Date	Author	Changes
1.0	June 2016	Legal & Company Secretary	Policy creation
2.0	28 July 2020	Rachel Quinn	Policy & format revision
	28 July 2020	Aniva Cavanagh	Policy revision
	28 July 2020	Rowan Hindmarsh	CEO approval

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Employee Acknowledgement:

Signed: [acceptance_status]

Date: [acceptance_date]

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