

## Privacy Policy

**Cawdor Developments Pty Ltd (ACN 676 167 856) (we us our)** is committed to protecting personal information and will take all reasonable steps to secure the personal information it holds. A reference in this policy to Cawdor Developments Pty Ltd (ACN 676 167 856) also includes our wholly owned businesses and brands.

We understand the importance of privacy and are committed to collecting and handling personal information in accordance with all applicable privacy laws. We are committed to complying with the *Australian Privacy Act 1988* (Cth) (Privacy Act) and the Australian Privacy Principles (APPs), and privacy matters are set out in the privacy policy below

We may update this Privacy Policy from time to time. The current version will be published on our website.

By visiting our website or otherwise dealing with us, you agree to this policy and you also agree to the collection of your Personal Information and also to our collection, holding, use and disclosure of your Personal Information in accordance with and as set out in this privacy policy.

## Types of Personal Information we collect

**Personal information** means information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not, and whether the information or opinion is recorded in material form or not.

Personal information that we collect and hold may include the following:

- Name
- address
- date of birth
- employer, previous employers and length of any employment
- email address
- telephone numbers
- payment method
- your occupation (and duration of that occupation)
- your combined household income (range)

- whether you own or rent your home and your personal interests
- customer history with us
- your real estate agent

(Note: we may not collect all of the above Personal Information from you at any one time)

**Websites** - when you use one of our websites, we may also collect Personal Information about you in the following general categories:

- location settings and IP information: If you permit an app to access location services in your settings, then we collect your device location to deliver your order or to send you alerts
- usage and preferences: We collect information about how you interact with our websites or apps, including the pages you visit, your preferences and the settings that you choose. We do this through cookies and other similar technology
- device information: We collect information about your device, such as the hardware model, operating system, preferred language, unique device identifier and mobile network.
- the date and time you accessed the website
- the source from which you linked directly to our website
- the pages you accessed while visiting the website and your interactions with the website

**Applicants for employment:** If you apply for employment or to become a franchisee we may also collect and store information including your:

- education, training and other qualifications
- work history
- professional or trade associations or union membership
- hobbies and other interests
- criminal history
- personal statements about your attitudes to:
  - life
  - work
  - relationships
  - other workers

We will collect, hold and use that information solely for the purposes of assessing your application. If you are successful, your information will become part of your record.

**Current employees** - If you are an employee or a former employee, we collect all of the Personal Information noted above and in addition information about the training modules you have completed, the forms you have submitted, personal information you have provided, the approvals you have given or received, and other similar information related to your job.

**Sensitive information** - We do not collect sensitive information except as set out in this section or with your informed consent.

## Why we collect Personal Information about you

We collect Personal Information about you in order to provide our products and services and for the following primary purposes:

- to administer the provision of our products and services to you
- the administration of agreements to which both you and we are a party
- to ask about your experiences with or impressions of products or services supplied by us or to you or in respect of which you have made enquiries
- to conduct marketing, promotional and advertising activities
- to conduct surveys and assess market trends
- to improve website functionality or useability
- to facilitate the operation or functionality of operational, administrative, information and other systems and procedures
- to assist with audits, reviews, investigations or enquiries concerning goods or services supplied by us or to you or otherwise
- the administration, management or improvement of business
- for data analytics and market research
- assessment and processing of job or other applications
- to share between our related bodies corporate for any of these purposes
- to communicate with you (or to disclose your personal information to third parties so they may communicate with you), by way of direct marketing, information about our goods or services or those of other organisations

- any potential or actual sale, transfer, merger, acquisition, restructure or other dealing in respect of business or assets
- agreements we have with suppliers of products or services supplied by us or to you or in respect of which you have made enquiries, other suppliers, financiers, insurers, brokers, service providers, or other external parties whatsoever (counterparties)
- any purpose requested or consented to by you
- any purpose required, authorised or permitted by law
- compliance with any law including the National Consumer Credit Protection Act, Privacy Act, Anti-Money Laundering and Counter-Terrorism Financing Act and any other law whatsoever
- any purpose referred to in this policy.

## How we collect Personal Information from you

We collect personal information about you in a number of ways, including directly from you when you:

- use our websites, interact with us and provide personal information by any other means, including either physically or electronically;
- use physical, electronic or online forms (including our expression of interest (EOI) forms
- contact us via email
- contact us via telephone
- enquire about our products or services or about becoming our customer, or if you become our customer, in relation to any products or services
- make enquiries about or apply to become an employee, independent contractor, supplier of us or any of our franchisees
- provide us with your personal information in relation to a promotional campaign, requesting a quote, make a complaint or for any other reason
- otherwise deal with us

We may also collect Personal Information about you from other third party sources when it is impractical or unreasonable for us to collect it directly from you. These sources may include:

- a real estate agent
- a credit reporting body
- someone authorised by you such as an agent, broker, accountant, solicitor, attorney, financial counsellor, introducer, business colleague, associate, family member or guarantor
- where you have consented to a third party disclosing your personal information to us (e.g. when you enter a promotion run by a third party for us);
- where it is lawful for a third party to disclose your personal information to us.
- a referee
- an employer (current or former)
- a government body (including law enforcement)
- financial institution
- our agents such as real estate agents, debt collectors or solicitors

We also collect personal information about you from third parties, including when:

- you choose to create an account or register for a product or service via a Website;
- you have consented to a third party disclosing your personal information to us (e.g. when you enter a promotion run by a third party for us); and
- it is otherwise lawful for a third party to disclose your personal information to us.

When collecting Personal Information by whichever means, we will take reasonable steps to provide the appropriate notices and obtain relevant consents in accordance with privacy laws. We may keep unsolicited personal information (personal information we receive that we have taken no active steps to collect) if the information is reasonably necessary for one or more of our functions, services or activities.

## Disclosure of Personal Information

We may, from time to time, disclose your Personal Information to:

- our employees, affiliates, controlled entities, contractors (or sub-contractors) or other third party service providers in order to provide our services, including (but not limited to) IT service providers, cloud providers;

- our professional providers or advisors (e.g. lawyers, accountants, business advisors)
- marketing, business or other related purposes;
- real estate agents, banks, lawyers, financiers
- credit reporting agencies, courts, tribunals and regulators if you fail to pay for the services provided to you;
- your neighbours and others in a development for the purpose of arranging dividing fences and any other shared facilities
- any other individual or third party for any authorised purpose with your consent or when authorised or required by law
- If we merge with, or are acquired by another company, or we sell all or a portion of our assets, your personal information may be disclosed to our advisers and any prospective purchaser's adviser and may be among the assets transferred

We may disclose personal information for secondary purposes that are related to the primary collection purpose but only in situations where it is reasonable to expect such information to be disclosed.

## You do not have to provide us with your Personal Information

You don't have to provide any Personal Information to us. However, if you do not do so, this may affect or completely restrict our ability to provide you with our products and services, including our websites, our ability to provide you with relevant content, prizes, products and services, or our ability to process your queries and employment applications.

## How we secure your personal information

We use reasonable endeavours to secure your Personal Information which may include:

- maintenance of a secure environment for storage of information
- requiring that access to such information be confined to authorised personnel
- using technology such as encryption or password protection to secure information

We require other entities that collect your information from us to use reasonably available technology to secure it.

We are not responsible for the security of any computer, mobile phone, tablet computer or other device whatsoever which you use to access our website or to communicate with us and through which we provide communications to you.

## Cookies, analytics and platforms

Our websites use cookies to provide the functionality necessary to deliver our products and services. Our websites also use a number of third party services such as analytics and security that also utilise cookies. We do not control these third parties or their cookies and we refer you to the third party's website for details on how they use their cookies.

## Consent

You hereby provide your fully informed consent to the collection, use, disclosure and storage of your Personal Information as described in this Privacy Policy.

You can withdraw your consent at any time by notifying the Privacy Officer as described below.

## Cross border disclosure of Personal Information

Your Personal Information may be disclosed to overseas recipients as part of our ordinary business or normal use of our information technology systems. We may disclose your Personal Information overseas for the purposes of provision of services, marketing, IT services, accounting, support and maintenance, merger and acquisition activity, research and other purposes.

Some of our operations, related entities and/or third party service providers are located in countries outside of Australia including but not limited to United States of America. When we disclose your Personal Information to any overseas recipients, we shall do so only for purposes listed in this Privacy Policy and in accordance with applicable privacy laws.

## Direct Marketing

Marketing our products and services is important for us to fulfil our role. We use a number of direct marketing strategies and channels including email and third party marketing companies (agents) to provide you with information relating to our products, and services that we reasonably think may be of interest to you.

We will provide you with a way of opting out of receiving direct marketing communications or you can opt out by contacting our Privacy Officer as described below.

## How you may access your personal information

Any request for access to your Personal or Sensitive (if any) Information held by us must be sent by email or post to our contact details referred to below under the heading 'Our Contact Details'.

If we are unable to grant your access, we will give you our reasons in writing within a reasonable time. These may include where providing the information to you may:

- reveal personal information about another individual person
- pose a threat to the health or safety of another individual person
- not be permitted by law
- reveal information of a commercially sensitive nature which is not required to be disclosed to you by Australian Privacy Law

There may be a charge to make a request for access to your information.

We cannot give you access to credit information held about you by an external party whether that body obtained the information from us or not. We refer you to the privacy policy of that body.

## How you may correct any personal information we hold about you

If you believe any Personal Information we hold about you is incorrect, please contact us to the contact details referred to below under the heading 'Our Contact Details' and tell us what information is, in your belief, incorrect and how you want it changed.

We will deal with your request according to applicable privacy laws. If we receive a request for access or correction, we will provide our response and/or complete any reasonable action within the timeframe required by law.

If we have supplied credit information which we have agreed to correct to a credit reporting body, we will notify that body within the timeframe required by law.

## Complaints about how we deal with your personal information

If you have any complaint about how we deal with your personal information, please contact our Privacy Officer at the contact details referred to below. Our Privacy Officer will follow our Privacy Internal Dispute Resolution Process.



## Our Contact Details

All communications you send to us must be sent by email or post to the following address AND marked to the attention of “The Privacy Officer”:

- By email: [admin@boldstone.com.au](mailto:admin@boldstone.com.au)

## External Services

If you have contacted our Privacy Officer (see below for contact details under the heading 'Our Contact Details' above) and are not satisfied with our dispute resolution process, you may also refer the matter to:

The Office of the Australian Information Commissioner GPO Box 2999 Canberra ACT AUS 2601 Tel: 1300 363 992 Fax: 02 9284 9666 Website: [www.oaic.gov.au](http://www.oaic.gov.au)

## Changes to this Policy

We may make changes to this Privacy Policy from time to time for various reasons including:

- changes to the law
- changes to technology
- changes to our business practices, procedures or systems

We will notify such changes by including the updated policy on our website. Where the changes may affect you in a particular way, and you have a contract with us, we will notify you if required by the contract or applicable law.

## APP5 Privacy Collection Notice

Privacy Collection Notice

**Cawdor Developments Pty Ltd (ACN 676 167 856)**

**Contact:** Privacy Officer email: [admin@boldstone.com.au](mailto:admin@boldstone.com.au)

**Our Privacy Policy** - Our Privacy Policy sets out our approach to the management of personal and sensitive information. Subject to the Privacy Act 1998 (Cth), you can have access to and seek correction of your personal and sensitive information. Our Privacy Policy contains information about how you can do this. Our Privacy Policy also contains information about how you can make a complaint about a breach of privacy.

**Collection and use** - Your personal information is being collected by **Cawdor Developments Pty Ltd (ACN 676 167 856) (Cawdor)**. Cawdor collects your personal information for the primary purposes of providing you with our services and associated purposes set out in our Privacy Policy'. If you do not or are unable to provide your personal information, we may not be able to provide you with our services. By completing this form, you consent to the collection, use and disclosure of your personal information as described in our privacy policy at [www.cawdor.com.au](http://www.cawdor.com.au). Specifically, you also consent to us disclosing your personal information to our service providers located in Australia and the US.

### Guidance

This Privacy Collection Notice must be used wherever you originally collect Personal or Sensitive Information - whether by electronic or paper means.

For electronic collection, where you use an electronic form, regardless of the channel (web, email, social media etc), you must include the Privacy Collection Notice (which can be a section of the electronic form or a pop up), and a 'checkbox' where the customer 'ticks' that they have read and agree to the Privacy Collection Notice and to the privacy policy. You need to make an electronic record of the customer agreement and retain for seven (7) years and then dispose of it.

For paper collection (including your EOI form), you must include the written Privacy Collection Notice, and the customer agrees they have read and agree to the Privacy Collection Notice and to the privacy policy by physically signing the form. The form should be kept as a record for seven (7) years and then disposed of.