

## **Privacy Policy**

We're committed to protecting your personal information and confidentiality. It's important to us and is an integral part of our service to you. We want you to feel secure whenever you deal with us and that you understand how we protect your privacy.

To safeguard your personal information, we've implemented a number of practices, procedures and systems to protect your privacy whenever we collect, hold, use or disclose your personal information.

This Privacy Policy applies to all organisations within the Milieu Group (**Milieu, we, us**). We are bound by the *Privacy Act 1988* (Cth) (**Privacy Act**) and we manage and protect your privacy in accordance with the Australian Privacy Principles (**APPs**).

### **1. Collection of Personal Information**

Personal information is defined in the Privacy Act as being information that identifies or could reasonably identify an individual. This may include an individual's name, address, email address, and telephone numbers. The type of personal information that Milieu collects will vary depending on the reason for engagement.

Milieu only collects personal information where we consider it to be reasonably necessary for our business functions or activities.

Milieu only uses personal information for the purpose specified or which is reasonably apparent at the time the information was collected, or for a related purpose for which the individual would reasonably expect it to be used.

The kinds of personal information that we may collect include:

- your name, date of birth, age, occupation and employment details;
- your postal address, email address and telephone number;
- information about individuals who wish to purchase or express an interest to purchase property from us;
- information about individuals who wish to lease spaces and relevant information reasonably necessary to grant a lease;
- when you use our website, your IP address, log-in details and website usage (see the Cookies section below).

### **2. How we collect your Personal Information**

We will obtain your personal information only by lawful and fair means, and where practical, directly from you. If you provide your personal information to someone we deal with, we may obtain it from that person.

By using our services or providing personal information to Milieu, you affirm that you consent, and you have the consent of any other individuals whose information you are providing, to Milieu dealing with it under this Policy.

The circumstances in which we directly collect personal information will vary depending on the nature of the interaction. Some common ways we collect personal information directly from you are:

- When you purchase, or express an interest to purchase an apartment, townhouse or tenancy;
- When you register or subscribe for electronic direct mail outs;
- When you lease, or express an interest to lease spaces;
- When you seek employment with Milieu or are an employee;
- When you supply goods and services to Milieu;
- Security holders or investors in Milieu;
- Users of website, social media or other online services.

### **3. Use and Disclosure of Personal Information**

Milieu will only use personal information for a purpose which is reasonably apparent at the time when the information was collected.

Milieu may also use or disclose the information collected for any other related purpose for which the individual would reasonably expect it to be used.

We will obtain your consent if we wish to use or disclose the personal information in other circumstances.

#### **4. Disclosing Personal Information to Other Parties**

We engage with a range of third parties in order to operate our business and provide services. We may disclose personal information to third parties for the same purposes as are set out in paragraph 3 above.

Organisations to which we may disclose your personal information include:

- Milieu's contractors, consultants, advisors and service providers who assist us in the operation of our business or to provide a customer service;
- Joint venture partners for the purposes of seeking relevant regulatory approvals;
- Relevant parties in situations when Milieu is required by law to provide information to government bodies such as the ATO, ASIC, and the police or courts, and in each case, their representatives, contractors, agents and distributors.

Milieu limits the information disclosed to external parties to what is required for them to perform their services or what is required by law.

Milieu does not sell personal information.

#### **5. Disclosing your personal information overseas**

When collecting your personal information, we'll generally notify you of any overseas recipients that we may disclose your personal information to. We may need to disclose personal information to an overseas recipient in instances, for example, where we outsource a function involved with the business.

At the current time, Milieu does not disclose personal information to overseas recipients. Should this change in future, before disclosing your personal information to an overseas recipient we'll take all reasonable steps to ensure that the overseas recipient does not breach the Australian Privacy Principles in relation to that information. If we cannot ensure this, we will not disclose your personal information without your consent.

#### **6. Protecting your personal information**

We store information in different ways, including paper and electronic form. We take reasonable steps to protect it from misuse, interference, loss, unauthorised access, human error, modification or disclosure including:

- secure password protected databases for storage;
- confidentiality requirements of staff;
- security for access to our systems including firewalls; and
- limiting the provision of personal information to third parties on a need to know basis, and subject to commitments from them that are similar to the commitments we make in this Policy.

Due to the nature of electronic communications and the public internet, we cannot guarantee that personal information will be protected against unauthorised access or misuse. We do not accept any liability for breaches due to human error, malicious or inadvertent disclosure, technology flaws or malfunction, or the improper actions of unauthorised third parties.

#### **7. Marketing**

If we hold your personal information, Milieu may use or disclose that information (other than sensitive information) for direct marketing if:

- we collected the information from you in accordance with this Privacy Policy; and
- you would reasonably expect us to use or disclose the information for that purpose; and
- we provided you with a simple way to opt out of receiving direct marketing from us; and
- you have not made such an opt out request.

Whenever we send you marketing material, we will always inform you how you can opt out of our mailing list. We will implement your request free of charge within a reasonable time.

#### **8. Collection of Cookies**

Milieu may also collect cookies from you during a visit to the Milieu website. "Cookies" are data files (of letters and numbers) that we store within the hard drive of your computer when you interact with our website. Cookies are necessary to allow the website

to function effectively and enhance security. Cookies can record information about the user's visit to assist Milieu in understanding the needs of the user.

When you visit our website, our servers collect routine logging information such as the pages visited, the time of your visit, your web browser and device type and the IP address associated with your request. We also collect referring URLs of website you have visited or will visit, data about the activities you undertake and how you interact with us online, such as what data is displayed, clicked on or shared, the click stream patterns, and the length of time you spend on our site or page.

Milieu sometimes also use performance tracking technology to help us track user behaviour on our website. Performance tracking and user traffic data is not personally identifiable and is collected on an aggregate level to report statistics to assist Milieu to improve the quality and relevancy of our services and the design of homes.

If users of the Milieu website do not wish to receive any cookies, they should set their browser to refuse cookies but this means that certain parts of the Milieu website may not function properly.

## **9. Resolving your privacy issues**

If you have any issues you wish to discuss with us or if you're concerned about how we have collected or managed your personal information, please contact our office on through the "Contact Us" section of our website.

For information about privacy or if your concerns are not resolved to your satisfaction, you may contact the Office of the Australian Information Commissioner at [www.oaic.gov.au](http://www.oaic.gov.au) and on 1300 363 992.

Milieu reserves the right to change this policy at any time.

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