

# Precision Group Privacy Policy

The Precision Group (**Precision Group, we, us, our**) is a group of Australian private property investment companies and includes the companies listed at <https://www.precision.com.au/precision-group-list-of-companies>.

We own and manage a range of commercial property and shopping centres in Australia and New Zealand and are accordingly bound by:

- the Australian Privacy Principles (**APPs**) in the *Privacy Act 1988* (Cth) in Australia; and
- the Information Privacy Principles (**IPPs**) in the *Privacy Act 1993* (NZ) in New Zealand, (**Privacy Laws**).

We understand the importance of, and are committed to, protecting your personal information.

This Privacy Policy explains how we manage your personal information (that is, information or an opinion about you, whether true or not, which identifies you or from which your identity is reasonably identifiable), including our obligations and your rights in respect of our dealings with your personal information.

Please take a moment to read our Privacy Policy as it describes what happens to the personal information we collect when we provide you with our products and services, and when you access our websites (in each case, our **Website**), mobile applications and social media accounts.

## 1 How we collect your personal information

We will collect and hold your personal information in a fair and lawful manner, and not in an intrusive way. Where it is reasonably practical to do so, we will collect your personal information directly from you. We may collect personal information through some of the following means:

- (a) when you access or use the Wi-Fi service we provide in our centres (**Wi-Fi Service**) under our Wi-Fi terms of use (**Wi-Fi Terms of Use**) available at <https://www.precision.com.au/wi-fi-terms-of-use> (see below);
- (b) when you access or use one of our centres or car parks (as a result of video surveillance and location sensing devices);
- (c) when you enter competitions or subscribe to our email or mobile services and newsletters, or access and use our Website, social media or mobile applications;
- (d) when you purchase and use a gift card;
- (e) when you communicate with us via telephone, email or facsimile, or otherwise correspond with us (whether in writing or electronically);
- (f) when you submit an application form relating to a proposed tenancy or the provision of services as a supplier or contractor;
- (g) in the course of administering, performing or managing contracts with our service providers or other third parties;

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- (h) when you provide us with information in response to direct marketing or customer satisfaction and market research surveys and questionnaires;
  - (i) in the course of administering or providing any of our services;
  - (j) from credit reporting bodies;
  - (k) when you apply for employment with us; and
  - (l) as otherwise required to manage our business.

However, in some cases (for instance, in relation to applications for tenancies in our centres or where there is an incident in one of our centres or car parks), we may also collect personal information from someone other than you, for example:

- (a) from your bank or other relevant financial institutions;
- (b) from credit agencies;
- (c) from publicly maintained records or other publicly available sources of information including social media and third party websites;
- (d) from third parties you authorise to disclose your information to us (including banks and other third party financial services);
- (e) from our vendors, suppliers or other business partners that help provide our services (for example, retailers in our centres, contractors, insurers, recruitment agencies, and customer support or payment service providers); or
- (f) from any other third party in connection with our services (including law enforcement agencies, emergency services, government bodies and referees).

Generally, Precision Group will only collect your personal information from sources other than you if it is unreasonable or impracticable to collect that personal information from you. If we collect personal information from a third party we will, where appropriate, request that the third party inform you that we are holding such information, how we will use and disclose it, and that you may contact us to gain access to, correct and update the information.

In particular, when you access or use our Wi-Fi Service, your personal information may be collected and handled by us and our Wi-Fi service provider, Skyfii Group Pty Ltd (ACN 165 152 241) (**Skyfii**). In addition to this Privacy Policy and our Wi-Fi Terms of Use, Skyfii's Privacy Policy and Terms & Conditions apply to your use of the Wi-Fi Service and are available at <http://skyfii.com/privacy-policy/> and <http://skyfii.com/terms-and-conditions/>. Please read each of these documents carefully as they describe what happens to personal information collected by us and Skyfii in connection with the Wi-Fi Service.

## **2 Types of personal information we collect**

The types of personal information we may collect and hold about you will depend on a range of circumstances, including who you are and which of our services and products you are looking to access or use. For instance, we generally need to collect more personal information about our tenants than about the customers of our centres.

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Generally, the personal information we collect can include (but is not limited to):

- (a) your name, date of birth, age, gender, postcode and other demographic information;
- (b) your contact details, such as your email, postal and work addresses and phone numbers;
- (c) information to verify your identity, such as your driver's licence number or passport details;
- (d) billing and financial information (such as your banking or payment information, credit card number, cardholder name and expiration date);
- (e) information relating to your creditworthiness (including the credit information described in section 4 below);
- (f) information about properties you own;
- (g) if applicable, employment information, such as job application information;
- (h) information relating to incidents connected to our business, such as personal injuries, misconduct, breach of conditions or unlawful activity;
- (i) any information which is publicly available, including on a third party social media service; and
- (j) any other information you provide us from time to time, including your preferences or opinions relating to our products, and information relating to surveys, competitions, enquiries or complaints.

In addition, when you access or use:

- (a) one of our centres or car parks, we may collect details of the vehicle you were driving and its number plate, and any other details captured by our video surveillance, or the video surveillance of retailers in our centres, including images of you and your vehicle;
- (b) our Website or mobile applications, we may collect non-identifiable information about your hardware, software and activities, which can include your IP address, browser type, domain names, pages you accessed and the dates and times you accessed them, how long you spent on those pages and our Website, and referring website addresses (including through the use of 'cookies' as described in section 8 below);
- (c) our Wi-Fi Service, we may collect:
  - (i) demographic information, and other information about your preferences as a shopper at one of our centres, including any information you provide us in response to survey questions;
  - (ii) information about the system or device which connects to the Wi-Fi Service, including the type of system or device, its name, MAC address, location and movement data, and other information relating to operating systems, browser types, IP addresses and data usage; and
  - (iii) any information transmitted or received by the system or device which connects to the Wi-Fi Service, including when it connected and disconnected, periods of inactivity,

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which website pages it visited, the date and time it accessed them and the time it spent on each page; and

- (d) our Wi-Fi Service using an account or using an email that is associated with an account, with a third party social media service, we may collect any personal information you have permitted that social media service to share, such as your name, account ID, date of birth, gender, age, location, pictures, email address, followers or friends lists and any other information which is publicly available on that social media service.

Also, when you enter competitions or subscribe to our email or mobile services and newsletters, your name and address are automatically entered into our database and you authorise us to contact you electronically (including by email or SMS) including to inform you about products and services, offers, events, activities and promotions relating to our centres.

If you do not provide us with the personal information we request from you, we may not be able to supply the products or services you have requested, or we may be restricted in the way we supply those products or services.

We may also hold other kinds of personal information as permitted or required by law or other kinds of personal information that we notify you of at or about the time of collection.

Generally, we do not collect sensitive information about individuals. Information about your health, racial or ethnic origin, political persuasions, criminal record and religious or philosophical beliefs are all examples of sensitive information. If we do need to collect sensitive information about you, we will only do so with your consent or where we are required to do so by law.

### **3 Our purposes for handling your personal information**

As a general rule, we only process personal information for purposes that would be considered relevant and reasonable in the circumstances. For instance, if personal information is obtained in connection with an application for a tenancy, we would generally use that personal information to assess your suitability as a tenant, and your ability to perform your obligations.

In particular, we collect, hold, use and disclose personal information:

- (a) for direct marketing purposes, including to prepare and provide marketing information about our retailers, our products and services and those of our related companies and other organisations, and details of offers, events, activities, promotions and other information relating to our centres in accordance with the Privacy Laws and section 6 below;
- (b) to offer and provide you with our products and services, or request feedback about products and services you have received;
- (c) to manage and administer those products and services;
- (d) to conduct business planning and research into our customers and retailing trends including
  - (i) analysing general statistical information regarding the use of our Website or the Wi-Fi Service; and
  - (ii) measuring and analysing time spent in our centres and car parks, and shopper behaviour in order to improve our centres and car parks;

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- (e) in the case of credit information, to assess your creditworthiness for the purposes of an application by you for commercial credit;
  - (f) if you have applied for employment, we may use your personal information to consider your suitability for alternative roles;
  - (g) to communicate with you;
  - (h) to comply with our legal and regulatory obligations;
  - (i) in connection with the management and security of our centres and car parks, including to assess and action security and other incidents relating to our centres, such as circumstances where we suspect fraud or other illegal activity (which may involve disclosure of personal information to law enforcement agencies, emergency services, government bodies, retailers in our centres and insurers);
  - (j) for any purpose disclosed to you and to which you have consented;
  - (k) for any purpose that you would otherwise reasonably expect; and
  - (l) otherwise to appropriately manage and conduct our business, including performing administrative functions such as billing and accounts and records management.

In addition, where we have collected personal information as a result of you accessing or using the Wi-Fi Service, this personal information is collected, and we may hold, use and disclose this personal information:

- (a) for direct marketing purposes, including sending notifications to your device (including via push notifications, video interstitials, social media channels or electronic messages) about our retailers, our products and services and those of our related companies and other organisations, and details of offers, events, activities, promotions and other information relating to our centres in accordance with the Privacy Laws and section 6 below;
- (b) for research and marketing purposes, including tracking searches made, or websites accessed, using our Wi-Fi Service in order to facilitate direct marketing, compiling usage statistics and conducting analytics on shopper demographics and preferences;
- (c) for the purposes of providing the Wi-Fi Service;
- (d) to maintain and improve the Wi-Fi Service, our Wi-Fi Terms of Use and our Website;
- (e) to monitor and log data transmitted using the Wi-Fi Service for security, performance and other purposes, including monitoring and enforcing compliance with our Wi-Fi Terms of Use;
- (f) to initiate, or assist with, an investigation into any use of the Wi-Fi Service in connection with any unlawful act or purpose; and
- (g) for any other purpose which you either expressly or impliedly consent to by agreeing to the Wi-Fi Terms of Use and accessing and using the Wi-Fi Service.

We do not sell, rent or lease your personal information to third parties. However, we may disclose personal information to third parties for purposes described in this section.

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We may disclose personal information to our related companies, agents and organisations or to third parties such as our contractors, suppliers, partners, retailers, insurers, service providers (including organisations that provide us with technical and support services), or our professional advisors or consultants, where permitted by the Privacy Laws. We may also disclose personal information to entities seeking to acquire all or part of our business, or other entities with your consent. If we disclose information to a third party, we generally require that the third party protect that information to the same extent that we do.

## **4 Credit reporting**

From time to time, where permitted by the Privacy Laws, we may collect, hold, use and disclose certain credit and credit eligibility information about you, including:

- (a) your name, current and previous addresses, driver's licence number, date of birth and employer;
- (b) the fact that you have applied to us for one of our products or services and any credit limit on your account;
- (c) your repayment history, including the amount of any payments due to us which are overdue for at least sixty days, and when steps have been taken by us to recover those overdue payments;
- (d) where an overdue payment has been previously reported, advice that the payment is no longer overdue;
- (e) default information, including cheques or credit card payments which have been dishonoured;
- (f) court judgments or bankruptcy orders made against you;
- (g) if, in our opinion, you have committed a serious credit infringement;
- (h) when we cease to provide products or services to you; and
- (i) other credit information that we are able to derive from the above information.

In particular, this credit information may be collected from, or disclosed to, credit reporting bodies. You authorise us to disclose such information to credit reporting bodies to assist them with assessing your creditworthiness for the purposes of us considering an application by you for commercial credit. You also authorise us to collect and use information from credit reporting bodies for the same purpose. We reserve the right to refuse or cancel the supply of products or services on the basis of a credit assessment of you.

If you believe you have been, or are likely to be, a victim of fraud you have the right to request that a credit reporting body not use or disclose your credit information. You can also request that a credit reporting body not use your credit information for the purposes of pre-screening or direct marketing by a credit provider.

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## 5 Overseas transfers of personal information

We may disclose personal information, including credit information, between our associated group entities in Australia and New Zealand, as part of our ordinary business processes, and to Skyfii in accordance with section 1 above, where permitted under the Privacy Laws. Also, we have service providers based in India and the United States of America that may access personal information as needed for specific projects. They are required to keep the information confidential and do not maintain an ongoing database of our personal information. Information is encrypted while it is being sent between us and our service providers.

By providing your personal information to us, you consent to us disclosing your personal information to any such overseas recipients for purposes necessary or useful in the course of operating our business and agree that APP 8.1 will not apply to such disclosures. For the avoidance of doubt, in the event that an overseas recipient breaches the APPs, that entity will not be bound by, and you will not be able seek redress under, the *Privacy Act 1988* (Cth).

If you do not want us to disclose your information to overseas recipients, please let us know.

## 6 Direct marketing

Like most businesses, marketing is important to our continued success. We believe we have a unique range of products and services that we provide to customers at a high standard. We therefore like to stay in touch with customers and let them know about new opportunities.

From time to time, we may contact you with information about new products, services and promotions either from us, or from third parties which may be of interest to you. In these situations, your personally identifiable information is not transferred to the third party. We will not disclose your personal information to third parties for marketing purposes without your consent.

Communications may be sent to you through electronic messages such as email, SMS and other messaging applications. We may also contact you through social media channels where you choose to interact.

## 7 How you can unsubscribe

You may opt out at any time from receiving communications from us that are not account related or legally required by making a request in writing to our Privacy Officer at [PrivacyMatters@precision.com.au](mailto:PrivacyMatters@precision.com.au) if you are in Australia, or [info@shore-city.co.nz](mailto:info@shore-city.co.nz) if you are in New Zealand, or by using the 'unsubscribe' function contained in every electronic direct mail or SMS message you receive from us.

## 8 Cookies

When you visit our Websites or other online services, we will generally leave a 'Cookie' in the memory of your web browser. The Website or other online service may only function properly if Cookies are enabled. Our Websites and online services may use persistent Cookies to authenticate you as a user and display content that is relevant and specific to you.

A 'Cookie' is a small text file placed on your website browser for a pre-defined period of time by our website server for later retrieval. Cookies are frequently used on websites and you can choose if and how a Cookie will be accepted by configuring your preferences and options in your browser. Cookies do not alter the operation of your computer or mobile device in any way. We use Cookies to identify specific machines and website interactions in order to collect aggregate information on how visitors are experiencing our Website. This information will help to better adapt our Website and mobile application to suit our customers' requirements. While Cookies allow a computer or mobile device to

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be identified, they do not permit reference to a specific individual, unless you have previously subscribed to our Websites or submitted a form via our Websites.

We hope you will want the better service that Cookies allow, but if you prefer, you can update your browser settings to disable Cookies. However, by doing that, your access to our Website and other online services may be compromised or limited. This may also affect the provision of certain services through our Website or other online services.

## **9 Protection of personal information**

We may hold personal information as either secure physical records electronically on our intranet system, in cloud storage or on third party servers.

We maintain appropriate physical, procedural and technical security for our offices and information storage facilities so as to prevent any loss, misuse, interference, unauthorised access, disclosure, or modification of personal information, including when we dispose of personal information.

We further protect personal information by restricting access to personal information to only those who need access to the personal information to do their job. Physical, electronic and managerial procedures have been employed to safeguard the security and integrity of your personal information.

We will destroy or de-identify personal information once it is no longer needed for a valid purpose or required to be kept by law.

## **10 Accessing and correcting your personal information**

Under the relevant privacy laws, you have a right to seek access to and correction of your personal information that is collected and held by us. This includes deletion from a website or removal from our records.

If at any time you would like to seek access to or request correction of (including a request that we delete) the personal information that Precision Group holds about you (including credit information) please contact us in writing addressed to our Privacy Officer at [PrivacyMatters@precision.com.au](mailto:PrivacyMatters@precision.com.au). We will respond to all requests to access or correct (including a request to delete) personal information within a reasonable time.

Further, if at any time you would like to delete your app account, you can do this by contacting us or following these instructions on how to delete your app account <https://apps.precision.com.au/delete-account>.

Precision Group will grant access to the extent required or authorised by the privacy laws or other law and take steps reasonable in the circumstances to correct personal information where necessary and appropriate. On the rare occasions when we refuse access, we will provide you with a written notice stating our reasons for refusing access. We may seek to recover reasonable costs incurred for providing you with access to any of the personal information about you held by us.

We are not obliged to correct any of your personal information if we do not agree that it requires correction and we may refuse to do so. If we refuse a correction request, we will provide you with a written notice stating our reasons for refusing.

If you are dissatisfied with our refusal to grant access to, or correct, your personal information, you may make a complaint to the Office of the Australian Information Commissioner.



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## 11 Resolving personal information concerns

If you have any questions, concerns or complaints about this Privacy Policy, or how we handle your personal information and credit information (including under the APPs or other binding codes), please contact our Privacy Officer at Precision Group of Companies, Level 25, 9 Castlereagh Street, Sydney NSW 2000, or via email at [PrivacyMatters@precision.com.au](mailto:PrivacyMatters@precision.com.au).

We take all complaints seriously and will respond to your complaint within a reasonable period.

If you are dissatisfied with the handling of your complaint, you may contact:

In Australia: Office of the Australian Information Commissioner  
GPO Box 5218, Sydney NSW 2001  
1300 363 992 or via email at [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au).

In New Zealand: Office of the Privacy Commissioner  
PO Box 10094, Wellington 6143  
0800 803 909 or via email at [enquiries@privacy.org.nz](mailto:enquiries@privacy.org.nz).

## 12 Further information regarding the Privacy Laws

If you would like further information relating to the application of the APPs and the *Privacy Act 1988* (Cth) in Australia, please visit [www.privacy.gov.au](http://www.privacy.gov.au).

If you would like further information relating to the application of the IPPs and the *Privacy Act 1993* (NZ) in New Zealand, please visit <http://privacy.org.nz>.

## 13 Personal information about employees

We collect information in relation to employees as part of their application and during their employment, either from them or in some cases from third parties such as recruitment agencies. We handle employee information in accordance with the requirements of the *Privacy Act 1988* (Cth) in Australia or the *Privacy Act 1993* in New Zealand and our applicable policies in force from time to time.

## 14 Changes

We reserve the right to change the terms of this Privacy Policy from time to time without notice to you. An up-to-date copy of our Privacy Policy is available on our Website or on request. This document was last updated on **20 September 2021**.