

Privacy Policy

In this Privacy Policy Lancini Group is the name used to describe the group of companies owned by Lancini Holdings Pty Ltd ACN 097 841 159. The companies that comprise of Lancini Group (**we, us, our**) are committed to protecting the privacy of the people with whom we deal. This Privacy Policy demonstrates that commitment by disclosing the ways in which we collect, handle and protect any information of a personal nature which we may have about you.

WHAT IS PERSONAL INFORMATION

Personal information is any information or an opinion about you that identifies you or through which your identity can be reasonably established. Examples of personal information include your name, signature, address, date of birth and any commentary or opinion about you.

If you choose not to provide us with your personal information, we may not be able to provide you with the products and services you require, or the level of service on which we pride ourselves.

WHOSE PERSONAL INFORMATION WE COLLECT

We may collect and hold information including (but not limited to) personal information about:-

- tenants and purchasers, potential tenants and purchasers, business associates and their employees;
- visitors to our website;
- contractors;
- job applicants;
- suppliers and their employees;
- people who elect to receive our mailing lists; and
- others we come into contact with.

WHAT PERSONAL INFORMATION WE COLLECT

The personal information we collect and hold may include:-

- full name;
- address;
- telephone numbers (including home, work and mobile);
- facsimile numbers;
- email addresses;
- occupation of people and the industry they work in.

HOW WE COLLECT PERSONAL INFORMATION

While we will usually collect information directly from you, personal information may be collected from you in a number of different ways including:-

- face-to-face meetings;
- telephone conversations;
- documentation provided to us;
- business cards;
- interviews;
- our website;
- emails and written correspondence that you send us;
- our mailing lists;
- third parties for example a credit reporting agency;
- your representatives; and
- from publicly available sources.

If you supply us with information about another person, you should ensure you are authorised to do so. You must inform that person who we are, that we will use and disclose their personal information as outlined in this Privacy Policy from time to time and that they have certain rights to access the personal information that we hold about them.

If you have referred us to third parties to obtain personal and other information about you we will assume, and you must ensure, that the third party is aware that you have referred us to them and of the purposes involved in the collection, use and disclosure of your personal information.

USE AND DISCLOSURE OF YOUR PERSONAL INFORMATION

We only collect personal information that is necessary for us to deal with your requests, to provide our products and services to you, to develop and promote our products and services, and to assist us with complying with our legal and regulatory obligations. This includes:-

- providing the services that you have requested from us;
- administering and managing those services including charging, billing and collecting debts;
- conducting appropriate checks for credit-worthiness where you have applied for credit;
- communicating with you;
- enabling our related entities to assist you with related services as required;
- researching, developing and enhancing our services;
- maintaining and developing our business systems; and
- complying with our legal obligations.

If you no longer wish to receive marketing and promotional material from us, please telephone us on telephone 07 4753 5500 and we will remove your details from our mailing list. Alternatively, you can send your request in writing to us addressed to Lancini Group, PO Box 7315, Garbutt, Qld, 4814.

As well as using your personal information for the primary purposes for which you provided it to us, we may also use the information for related secondary purposes, although we will endeavour to contact you for your express consent should the secondary purpose be one which we consider you may not reasonably expect. Examples of related secondary purposes include:-

- insurance purposes;
- exchanging information with a subsidiary entity and our agencies;
- quality assurance purposes; and
- other related purposes.

We may share, use and disclose your personal information within the companies that comprise of the Lancini Group for the purposes described above. The particular companies that may receive your personal information may depend on which company in the Lancini Group you do business with, or what product or service you are receiving.

DISCLOSURE OF YOUR PERSONAL INFORMATION

The people/organisations to which we disclose your personal information to may include:-

- our staff members;
- credit reporting agencies;
- contractors and outsourced service providers who manage the services we provide to you, including:-
 - information technology services;
 - installation, maintenance and repair services;
 - market research organisations; and
 - debt-recovery agencies;
- your authorised representatives;
- our professional advisers, including our accountants, and auditors;
- government and regulatory authorities and other similar organisations, as required or authorised by law;
- our related entities; and
- the joint ventures we are involved in, which includes the Fairfield Central Shopping Centre joint venture involving Landel Pty. Ltd. ACN 010 889 193 as trustee for the Lancini Family Discretionary Trust and Fairfield Land Pty Ltd ACN 070 431 220.

Please note that we do not sell or give our databases or mailing lists to any third parties.

CHANGES AND ACCESS TO YOUR PERSONAL INFORMATION

We are committed to keeping our records up-to-date and we encourage you to tell us when your details (such as your telephone number, address or name) change.

You can request access to the personal information we hold about you if you wish to do so. If we are unable to provide you with access, we will explain why. We also reserve our rights to charge a fee for searching for and providing access to your information.

SECURITY OF YOUR PERSONAL INFORMATION

We are committed to protecting your personal information from misuse and loss, and from unauthorised access, modification and disclosure, and will take reasonable steps to do so.

Where we engage a third party service provider, we will make sure that appropriate data handling and security arrangements are in place.

DISPOSAL AND DESTRUCTION OF YOUR PERSONAL INFORMATION

If we no longer need or are no longer required to hold your personal information, we may destroy or permanently de-identify that information, without further notice to you.

SENSITIVE INFORMATION

'Sensitive information' is a specific type of personal information, including information about your health, race, ethnic origin, political opinions, membership of political, professional or trade associations, religious or philosophical beliefs, sexual preferences and criminal history.

Australian privacy legislation impose great obligations on us regarding any collection, use or disclosure we make of your sensitive information.

Usually, we do not collect sensitive information. If for some reason we do need to collect your sensitive information, we will only collect it if:-

- you have expressly consented to us doing so;
- we are required to do so by law; or
- the collection is necessary to establish, exercise or defend a legal claim.

CHANGES TO THIS POLICY

From time to time, it may become necessary for us to review or amend this policy. Any changes will be made as and when required, and we will advise you of any changes by posting an updated version of our policy on our website, www.lancinigroup.com.au. An up-to-date copy of this policy will be available in hard copy at all times at each of our offices.

CONTACT US AND COMPLAINTS

If you would like more information about the way we manage personal information that we hold about you, or are concerned that we may have breached your privacy and wish to make a complaint, please contact us on one of the following methods:-

Email lancini@lancinigroup.com.au

Mail Lancini Group, PO Box 7315, Garbutt, Qld, 4814

Phone 07 4753 5500

Fax 07 4753 5529

We will do our best to resolve your complaint as quickly as possible, and in any event aim to respond to you within 30 days. If you are not satisfied with our response to your complaint, you can refer the matter to the Office of the Australian Information Commissioner.

Online www.oaic.gov.au

Mail GPO Box 5218, Sydney NSW 2001

Phone 1300 363 992

Fax 02 9284 9666

USE OF OUR WEBSITE & EMAIL SYSTEM

In addition to the above provisions, the following additional provisions apply to your use of our website.

AUTOMATIC COLLECTION OF YOUR PERSONAL INFORMATION

When you visit our website, our Internet Service Provider automatically records the following information about you for statistical purposes:-

- your server address;
- the website you visited immediately prior to ours;
- your domain name;
- date and time of your visit to our website;
- pages you accessed and the information or documents you downloaded; and
- type of browser you used.

EMAILS

We encourage the use of email communication to increase efficiency in communications. Emails sent to or by us are routinely monitored by our information technology staff for systems administration, quality control and compliance purposes.

We will only record your email address if you send an email to us. Email enquiries will be passed to the most appropriate staff member, who will be asked to respond to you directly.