

PRIVACY POLICY

INTRODUCTION

Alpha14 Pty Ltd and its related bodies corporate known as the Alpha 14 Property Group recognise the importance of protecting the privacy and the rights of individuals in relation to their personal information. This includes existing and prospective customers of our clients, potential and existing employees and contractors whom Alpha14 Property Group collects personal information from, or is provided with such information from our clients. This document is our privacy policy and it tells you how we collect and manage your personal information.

We respect your rights to privacy under the Australian Privacy Principles, which came into operation on 12 March 2014, and we comply with all of the Principles' requirements in respect of the collection, use, management, disclosure, quality, security, access and correction of your personal information.

WHAT IS YOUR PERSONAL INFORMATION?

When used in this privacy policy, the term "personal information" has the meaning given to it in the Act. In general terms, it is any information that can be used to personally identify you. This may include your name, address, telephone number, email address, credit card details, account number, and profession or occupation. If the information we collect personally identifies you, or you are reasonably identifiable from it, the information will be considered personal information.

WHAT PERSONAL INFORMATION DO WE COLLECT AND HOLD?

We may collect the following types of personal information:

Name;

Business name;

Mailing or street address;

Email address, telephone and facsimile numbers;

Mobile phone number;

Age or birth date;

Profession, occupation or job title;

ACN or ABN numbers;

Web site address;

Details of the services and property opportunities you have purchased from us or

our customers (on whose behalf we may provide services and property opportunities) or which you have enquired about, together with any additional information necessary to deliver those services and property opportunities and to respond to your enquiries;

Credit card details;

In the case of Alpha14 Property Group's website, how you use the website, and information regarding your browsing activity when you visit the website;

Any additional information relating to you that you provide to us directly through our website or indirectly through use of our website or online presence, through our representatives or otherwise; and

Information you provide to us through our service centre, customer surveys or visits by our representatives from time to time.

It is important to appreciate that much of the personal information we collect and hold is done so by us to conduct our businesses. For example, we receive enquiries from prospective purchasers of apartments in our current and further projects we use this information to identify the nature of the demand for apartments in Australia. When you fill in an enquiry form, reservation form or are contacted by one of our staff or one of the staff of our agent we collect the information provided. We have set out in the Annexure to this policy some more detail around the information we may collect and hold in respect of each of our key businesses. Please read this carefully.

We may also collect some information that is not personal information because it does not identify you or anyone else. For example, we may collect anonymous data or aggregated information about how users use our websites. We do not re-identify this information to turn it into personal information.

HOW DO WE COLLECT YOUR PERSONAL INFORMATION?

Personal information is only collected by lawful and fair means in accordance with the Act. We collect your personal information directly from you unless it is unreasonable or impracticable to do so. When collecting personal information from you, we may collect in ways including:

Directly from you via business cards, details provided in correspondence, over the telephone or when submitted by a form on one of our web sites;

Through your access and use of our website;

From third parties such as our related companies and agents;

From your representatives;

During conversations between you and our representatives;

During correspondence between you and our representatives, including electronic correspondence;

Through your use of telephone and mobile communication (including but not limited to fixed line IVR services, SMS and MMS);

When you complete a property enquiry form and reservation form.

From publicly available sources of information; or

When legally required to do so.

Some of the personal information Alpha 14 Property Group holds or deals with is not actually collected by Alpha 14 Property Group. Much of the data and personal information it deals with is provided to it by its agents, and has not actually been directly collected by Alpha 14 Property Group from the individual concerned.

In respect of personal information which is provided to us by our agents, we seek our agents' assurances that all such personal information has been collected lawfully and in compliance with the legislation and that all required consents have been obtained for, and disclosure statements made in respect of, the intended use of that personal information.

We may also collect personal information from third parties who are not our agents including for example, from third party companies such as data providers and brokers, credit reporting agencies, law enforcement agencies and other government entities.

COOKIES

We may log IP addresses (that is, the electronic addresses of computers connected to the internet) to analyse trends, administer the website, track users movements, and gather broad demographic information.

WHAT HAPPENS IF WE CAN'T COLLECT YOUR PERSONAL INFORMATION?

If you do not provide us with the personal information described above, some or all of the following may happen:

We may not be able to provide the requested services and property opportunities to you either to the same standard or at all; or

We may not be able to provide you with information about services and property opportunities that you may want, including information about discounts, sales or special promotions, or we may not be able to supply services to our clients which will enable our clients to do the same; or

We may be unable to tailor the content of our websites to your preferences, or we may not be able to supply services to our clients which will enable our clients

to do the same; or

If you are a client of ours, we may not be able to provide you with services and property opportunities you require; or

FOR WHAT PURPOSES DO WE COLLECT, HOLD, USE AND DISCLOSE YOUR PERSONAL INFORMATION?

We collect personal information about you so that we can perform our business activities and functions and to provide best possible quality of customer service to you and to enable us to provide services and property opportunities to our clients. We collect, hold, use and disclose your personal information for the following purposes, in each case, either on our own behalf or when acting on behalf of a client:

Verify your identity;

Assist you with our services and property opportunities;

Provide or improve our service delivery through a range of media;

Administer and manage our services provided to you including charging, billing and collection of debts;

Inform you of ways the services and property opportunities provided to you can be improved;

Research and develop our services and property opportunities;

Improve our understanding of your business to provide you with better services and property opportunities;

Maintain and improve our business systems for improved services and property opportunities delivery.

To provide services and property opportunities to you and to send communications requested by you;

To answer enquiries and provide information or advice about existing and new services and property opportunities;

To provide you with access to protected areas of our websites;

To assess the performance of our websites and to improve the operation of our websites;

For the administrative, marketing (including direct marketing), planning, services and property opportunities development, quality control and research purposes of Alpha 14 Property Group, its related business entities, clients, contractors or service providers;

To provide your updated personal information to our related business entities, agents, contractors or service providers;

To update our records and keep your contact details up to date;

To process and respond to any complaint made by you; and

To comply with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or in co-operation with any governmental authority of any country (or political sub-division of a country).

We may also use your personal information for the other purposes related to those described above which would be reasonably expected by you.

Except as provided below, your personal information will not be shared, sold, rented or disclosed other than as described in this Privacy Policy.

Alpha 14 Property Group sometimes handles personal information relying on exemptions under the Privacy legislation, for example in relation to (i) employee records; (ii) related business entities; (iii) provision of services to State or Territory authorities; and (iv) operations outside Australia relating to personal information of non-Australians. Any permitted handling of personal information under such exemptions will take priority over this Privacy Policy to the extent of any inconsistency.

TO WHOM MAY WE DISCLOSE YOUR INFORMATION?

We may disclose your personal information to:

Our employees, related business entities, agents, contractors or service providers for the purposes of operation of our websites or our businesses, fulfilling requests by you, and to otherwise providing services and property opportunities to you and our agents including, without limitation, web hosting providers, IT systems administrators, mailing houses, couriers, payment processors, data entry service providers, electronic network administrators, and professional advisors such as accountants, solicitors, business advisors and consultants;

Suppliers, agents and other third parties with whom we have commercial relationships, for business, marketing and related purposes; and

Any organisation for any authorised purpose with your express consent.

We may combine or share any information that we collect from you with information collected by any of our related bodies corporate. Our agents may do likewise.

DIRECT MARKETING MATERIALS

We may send you direct marketing communications and information about our

services and property opportunities that we, or our agents, consider may be of interest to you. These communications may be sent in various forms, including mail, SMS, fax and email, in accordance with applicable marketing laws, such as the Spam Act 2003 (Cth).

At any time you may opt-out of receiving marketing communications from us by contacting us (see details below) or by using the opt-out facilities provided in the marketing communications and we will then ensure that your name is removed from our mailing list (or where we are using a mailing list provided by our client or other third party, we will pass your request on to that party).

We do not provide your personal information to other organisations for the purposes of direct marketing (see also our use of cookies).

How can you access and correct your personal information?

You may request access to any personal information we hold about you at any time by contacting us (see details below). Where we hold information that you are entitled to access, we will try to provide you with suitable means of accessing it (for example, by mailing or emailing it to you). We may charge you a fee to cover our administrative and other reasonable costs in providing the information to you and, if so, the fees will be \$30 per hour of time spent. We will not charge for simply making the request and will not charge for making any corrections to your personal information.

There may be instances where we cannot grant you access to the personal information we hold. For example, we may need to refuse access if granting access would interfere with the privacy of others or would result in a breach of confidentiality. If that happens, we will give you written reasons for any refusal.

If you believe that personal information we hold about you is incorrect, incomplete or inaccurate, then you may request us to amend it. We will consider if the information requires amendment. If we do not agree that there are grounds for amendment then we will, where possible and practicable, add a note to the personal information stating that you disagree with it.

WHAT IS THE PROCESS FOR COMPLAINING ABOUT A BREACH OF PRIVACY?

If you believe that your privacy has been breached, please contact us using the contact information below and provide details of the incident so that we can investigate it.

Our procedure for investigating and dealing with privacy breaches is to ascertain all relevant facts and correspond with those involved (including where relevant our agents), reach a view as to the existence, scope and cause of the issue, and where relevant and appropriate, implement corrective or rectification measures.

A request for access to the personal information held by Alpha 14 Property Group

concerning an individual can be made by that individual to Alpha 14 Property Group's Privacy Officer on the number or address mentioned below or, in cases where Alpha 14 Property Group is acting through an agent, to the same contact. A fee may apply, the amount of which will be advised at the time of application.

Do we disclose your personal information to anyone outside Australia?

We may disclose personal information to our related bodies corporate and agents and service providers located overseas for some of the purposes listed above.

Except where specific individual consent has been obtained under APP 8.2(b), we take reasonable steps to ensure that the overseas recipients of your personal information do not breach the privacy obligations relating to your personal information.

We may disclose your personal information to entities located outside of Australia, including the following:

Our agents and their related entities located in foreign countries, to the extent that they are acting on our behalf or at our direction in using, storing, or collecting your personal information. Applicable foreign countries include United States of America, Canada, New Zealand, Great Britain, France, China, Malaysia, Indonesia, Sri Lanka, Hong Kong and Taiwan.

SECURITY

We take reasonable steps to ensure your personal information is protected from misuse and loss and from unauthorised access, modification or disclosure. We may hold your information in either electronic or hard copy form. Personal information is destroyed or de-identified when no longer needed.

As our website is linked to the internet, and the internet is inherently insecure, we cannot provide any assurance regarding the security of transmission of information you communicate to us online. We also cannot guarantee that the information you supply will not be intercepted while being transmitted over the internet. Accordingly, any personal information or other information which you transmit to us online is transmitted at your own risk.

LINKS

Our website may contain links to other websites operated by third parties. We make no representations or warranties in relation to the privacy practices of any third party website and we are not responsible for the privacy policies or the content of any third party website. Third party websites are responsible for informing you about their own privacy practices.

CONTACTING US

If you have any questions about this Privacy Policy, any concerns or a complaint regarding the treatment of your privacy or a possible breach of your privacy, please use the contact link on our website or contact our Privacy Officer using the details set out below.

We will treat your requests or complaints confidentially. Our representative will contact you within a reasonable time after receipt of your complaint to discuss your concerns and outline options regarding how they may be resolved. We will aim to ensure that your complaint is resolved in a timely and appropriate manner.

Please contact our Privacy Officer at:

Alpha 14 Property Group Pty Ltd, PO Box 5041, Alphington VIC 3078

Mobile: 0408 645 904

Email: suzana@alpha14.com.au

CHANGES TO OUR PRIVACY POLICY

We may change this privacy policy from time to time. Any updated versions of this privacy policy will be posted on our website.

This privacy policy was last updated on 15 August 2014.

ANNEXURE

Specific examples of Personal Information held by Alpha 14 Property Group

Business Activity	Types of Personal Information held and/or collected
Email marketing services, data analysis and management services	- Name, address, date of birth, email addresses, other contact information, purchase information, websites visited, purchasing trends, interests, profile information, census data, and other information supplied to us by our agents or data providers and brokers.

<p>Property enquiry details</p>	<ul style="list-style-type: none"> - Name, address, contact details, payment details including bank account details, credit card information, purchase history, purchase trends, enquiries, problems experienced, customer service issues, insurance policy details, referral advisor details, claim information, subscription details, email information, invoices, survey information. - Where we are given access directly to our agents systems, we have access to the personal information held in those systems.
<p>BPO – back office services</p>	<ul style="list-style-type: none"> - Name, address, contact details, payment details including bank account details, credit card information, purchase history, purchase trends, enquiries, problems experienced, customer service issues. - Where we are given access directly to our agents systems, we have access to the personal information held in those systems. - Help desk and other customer issues support as required.