

# Privacy Policy

Date Revised: July 2024

Where *you* belong

**PEET**

# Privacy Policy

## 1 BACKGROUND & PURPOSE

This Privacy Policy sets out how Peet Limited, its related companies and managed syndicates and trusts (**Peet, we, our, us**) collects, uses, discloses and manages your personal information and how Peet complies with the *Privacy Act 1988 (Cth)* (**Privacy Act**).

Peet has appointed a Privacy Officer. If you have any queries or complaints regarding your personal information, please contact our Privacy Officer using the contact details provided in this Privacy Policy.

When used in this Privacy Policy, the term 'personal information' has the meaning given to it in the Privacy Act. In general terms, it is any information about you which identifies you or from which you are identifiable. This may include your name, address, telephone number, email address and profession or occupation and any information about Peet's dealings with you.

## 2 WHAT PERSONAL INFORMATION DOES PEET COLLECT?

Peet provides a range of services on its own behalf and on behalf of the entities that it manages.

The type of personal information collected by Peet depends on the particular services you use, your request, and on your relationship with Peet. The information may be collected by Peet in its capacity as manager of an associated company; as responsible entity for a managed investment scheme; as a Developer or Real Estate agent; or as an employer.

The information we collect may include:

- your name, date of birth, gender;
- contact details including your, physical address, email address and telephone number;
- bank account and credit card details;
- information to verify your identity;
- information relating to your income and credit-worthiness;
- your employment history;
- details of products and services that we have supplied to you, or you have enquired about, together with any additional information necessary to deliver those products and services and to respond to your enquiries;
- information about you and your family and any characteristics, preferences or requirements that are relevant to the products and services that we may provide to you;
- any additional information relating to you that you provide to us directly through our websites or indirectly through use of our websites or online presence or otherwise. That information may include information regarding what web pages you access;
- information you provide to us through our representatives or customer surveys from time to time; and
- if you invest in our syndicates, trusts or in Peet Limited, information relating to you and your investment.

### **3 HOW DOES PEET COLLECT YOUR PERSONAL INFORMATION?**

Peet may collect your personal information using a variety of methods, including:

- through your access and use of our corporate or estate websites;
- through your participation in surveys, questionnaires, competitions and promotions run by or on behalf of Peet;
- during conversations between you and our representatives, including sales representatives;
- when you make an enquiry;
- when you complete an application for securities in our syndicates or trusts;
- when you complete an application for employment with us; or
- when you make an offer to acquire a property from one of our estates.

The information will generally be collected either physically (e.g. paper-based forms) or electronically (e.g. online forms).

We may also collect personal information from third parties including from our related companies and managed syndicates and trusts, third party companies such as credit reporting agencies and government entities.

You may refuse to provide us with some or all of your personal information, however, doing so may limit the ways in which we can interact with you.

### **4 FOR WHAT PURPOSES DOES PEET HANDLE YOUR PERSONAL INFORMATION?**

We collect, hold, use and disclose your personal information to provide you with an appropriate product or service or/and is relevant to your dealings with Peet, for example:

- to carry out our functions and activities as a Developer or Real Estate agent in accordance with our contract with you;
- to maintain registers of security holders;
- to facilitate distribution of payments and corporate communications (including annual reports, notices of meetings, quarterly operational updates) and other important information that we may wish to communicate;
- to send marketing communications to you, including by way of email, phone call or short message service (SMS) communication, to inform you of new estates and developments that might be of interest to you;
- to send you marketing communications to inform you of new investment opportunities
- for future employment opportunities; and
- to otherwise run our business.

If at any time you would like to opt out of receiving our marketing communications, you can contact our Privacy Officer or use the unsubscribe function included in our electronic communications.

## 5 TO WHOM DOES PEET DISCLOSE YOUR PERSONAL INFORMATION?

We may disclose your personal information to any entities within the broader Peet Group, to third parties engaged to assist in the provision of services to you or as it is otherwise relevant to the provision of our services more broadly, to community development partners, where it is required or authorised by law, or you consent to us doing so. Where your personal information is disclosed to third parties, we will take appropriate steps to ensure that the information is held, used, or disclosed in accordance with the Australian Privacy Principles.

Types of third parties include:

- individuals or entities which may be materially connected to, or impacted by, our business with you;
- our representatives, business partners, community development partners, contractors, or agents – for example during the marketing phase of a new land syndicate or similar product;
- our advisers, which may include lawyers, mortgage brokers, real estate agents, financial advisers, auditors, insurance companies, executors, administrators, trustees, attorneys, or other service providers; and
- regulatory authorities including the Australian Securities and Investments Commission, Australian Taxation Office or as otherwise required to fulfil legal and regulatory requirements.

Where Peet is required to disclose your personal information to a third party in accordance with the above, it will only disclose the personal information which is relevant or necessary in the circumstances.

Peet is unlikely to disclose personal information to overseas recipients and will only do so if it is authorised by law and it is satisfied that the recipient of the personal information has adequate data protection arrangements in place. Overseas organisations may be required to disclose information we share with them under a foreign law. In those instances, Peet will not be responsible for that disclosure.

## 6 COOKIES

A cookie is a simple text file that is stored on your computer or mobile device by a website's server. Each cookie is unique to your web browser, and contains anonymous information such as a unique identifier, the site name, and other non-personal information. It allows a website to remember things like your preferences but can also be used to enable companies to target their advertising or marketing messages based for example, on your location and/or web browsing habits. Cookies do not, by themselves, contain information that personally identifies you (such as your name, address, or email address). However, cookies can be used to identify that you have provided such information via an online form, and this can be associated with a company contact record.

Peet may use cookies to serve ads when you visit our website and third-party sites on which we advertise. In addition, Peet uses web beacons, provided by our ad-serving partner, to help manage our online advertising. These web beacons enable our ad server to recognise a browser's cookie when a browser visits this site, and to learn which banner ads bring users to Peet's website.

Cookies are stored on a computer's hard drive, but they cannot access it, so a cookie can't read other information stored on a user's hard drive, or get a user's email address, etc. Cookies can only store data that is provided by the server or generated by an explicit user action.

## **7 HOW DOES PEET PROTECT PERSONAL INFORMATION?**

Personal information is mainly held in secure electronic databases, paper-based files, and other records. We use a range of physical and electronic processes in seeking to ensure the security of personal information that we hold. Our staff, contractors and others to whom we choose to disclose personal information are required to maintain confidentiality and relevant security over personal information we hold.

## **8 HOW CAN INDIVIDUALS ACCESS AND CORRECT THEIR PERSONAL INFORMATION?**

You have the right to obtain a copy of any personal information which we hold about you and to advise us of any inaccuracy. There may be some exceptions to this, but we will let you know at the time. To make a request to access or correct information we hold about you, please contact the Privacy Officer. We will require you to verify your identity and to specify what information you require. We may charge a fee to cover the cost of verifying the application and locating, retrieving, reviewing and copying any material requested. If we refuse your request to obtain any of your personal information or to make a correction, we will let you know our reasons for doing so in writing.

## **9 HOW CAN INDIVIDUALS LODGE A COMPLAINT?**

If you believe that Peet has interfered with your privacy, or breached the Privacy Act, please communicate your complaint in writing to the Privacy Officer.

When the Privacy Officer receives your complaint, Peet will seek to respond promptly to your complaint. If you are not satisfied with the response, we encourage you to contact the Privacy Officer who will advise you about further options, including, if appropriate, contacting the Privacy Commissioner (Office of the Australian Information Commissioner).

## **10 CONTACT DETAILS**

All correspondence and privacy related queries and concerns should be directed to:

### **Privacy Officer**

Peet Limited

A: Level 7, 200 St Georges Terrace, Perth WA 6000

E: [privacy@peet.com.au](mailto:privacy@peet.com.au)

T: (+61) 8 420 1111

## **11 UPDATES OF THIS PRIVACY POLICY**

A copy of this Policy, which may, from time to time, be reviewed and updated, can be found on Peet's website.