

PRIVACY POLICY

Transact Property Group PTY LTD (ABN 92 164 899 692) (Transact Property Group, we, us, our) understands the importance of, and is committed to, protecting your personal information. We comply with the *Privacy Act 1988* (Privacy Act). We are bound by the Australian Privacy Principles (APPs) which regulate how we may collect, use, disclose and store personal information, and how our customers and suppliers and stakeholders ('you') may access and correct personal information we hold about you.

This Privacy Policy covers the Transact Property Group website and is applicable worldwide.

Collection of your Personal Information

This Privacy Policy sets out how and why we collect and use your Personal Information. Personal Information means any information that can be reasonably used to identify you as an individual, and may include, but is not limited to, your name, email address, postal or other physical address, title, occupation, and other information.

Some of the purposes for which we collect your Personal Information include:

- to provide you with information about Transact Property Group current and future products and services;
- to provide you with information about other businesses and their products and services that may add value to your experience of Transact Property Group products and services;
- to pass on to our partners who may offer to you products and services that complement and add value to our products and services;
- to gain information about consumer and retail habits and behaviour;
- to ensure compliance with applicable laws, rules and regulations
- provision of feedback about our products and services;
- activities in support of the above including administration, employment, management, marketing, contracting, online and mobile marketing, IT, legal, security, customer support, finance (including credit control) and human resources.

Personal Information we may collect about you

Information you provide

We may collect personal information that you choose to give us via online forms, social media comments, by email, or through video capture or data capture which may include:

- your name;

- your contact details, which may include postcode, postal, residential or business address, telephone number, facsimile number and email address;
- your job title and the name of the company that employs you;
- photographs or video footage of you;
- your vehicle details including tag/registration;
- location data;
- consumer behaviour;
- information we may require to provide you with a service;
- any other information you include in a communication to us.

Other personal information

In particular circumstances we may collect other information about you, for example:

- we may combine Personal Information about you with other information sourced from a third party to develop a persona to help us predict your preferences and behaviours;
- if you send us an email, we will retain the content of the email (including the sender address) and our response to you where we consider it necessary to do so;
- If you apply for a position with us, we may collect your contact details, date of birth, work history, academic history, referees, tax file number and other similar details relevant to the position;
- if you request information from us (for example about a facility, product, service or event) or register a complaint, we collect information about your request or complaint.

Google Analytics

We use Google Analytics to collect information about the use of our sites. Google Analytics collects information about your visit to our sites, but does not collect your Personal Information. Some of the information Google Analytics collects includes: your server and IP address;

- the name of the top level domain (for example, .gov, .com, .edu, .au);
- the type of browser used;
- the date and time you accessed the site;
- the pages accessed and documents downloaded
- the previous site you visited; and
- domain site cookies.

Although Google Analytics adds a permanent cookie on your web browser to identify you as a unique user the next time you visit this site, the cookie cannot be used by anyone but Google. Google's ability to use and share information collected by Google Analytics about your visits to this site is restricted by the Google Analytics Terms of Use and the Google Privacy Policy. You can prevent Google Analytics from recognising you on return visits to this site by disabling cookies on your browser.

Domain site cookies.

We may use cookies. A cookie is a small text file which may be placed on your Internet browser and which we access each time you visit a website. We use cookies

for security and to build up a picture of the sites, products and services you prefer, so that we can then provide you with a personalised experience of our websites and provide you with information of interest to you.

How we collect information about you

Mostly we collect your personal information directly from you, for example when you:

- make an enquiry about our products and services;
- contact us;
- participate in a promotion or marketing organised by us or a third party;
- log in to access free wifi;
- provide feedback or make a complaint.

Sometimes we collect personal information about you from another person or business, or from a publicly available source. For example:

- our service providers may provide us with your personal information from websites, mobile sites, social media sites, other technology based sources, location based sources and composites of any of these sources
- your employer may give us your details in relation to a supply or sales contract or provision of a product or service, or your participation in an event

Uses of your Personal Information

We will only use your Personal Information for the purpose it was collected. We will not subsequently change the way we use your Personal Information without your consent or unless we are required to do so by law.

Some of the ways we may use your Personal Information include:

- To keep you up to date on the latest Transact Property Groups products and services. This may include information from other business operators that can add value to your experience of Transact Property Groups products and services
- To provide marketing or promotional activities on the Transact Property Groups website.
- To conduct questionnaires and surveys in order to provide better services to our customers
- To support recruitment inquiries.
- To provide services to our clients, for example consumer footfall data, parking data, and other data
- To understand more about you, so we can provide better products and services to our clients
- For law enforcement reasons
- To meet contract obligations.

Sharing your Personal Information

Your Personal Information may be disclosed to personnel of Transact Property Group, and may be disclosed to our service providers, related bodies corporate, contractors and clients in order to allow us to perform our functions and to provide services to our clients.

We may share your Personal Information and any other additional information available to us in order for our clients or law enforcement to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, or as otherwise required by law.

Accuracy of your Personal Information

We will make reasonable endeavours to ensure that our records of the Personal Information you have shared with us are accurate, relevant, up to date, complete and not misleading. However, we need your help in doing this. Please notify us of any changes to, or errors in, your Personal Information.

Security of your Personal Information

Transact Property Group is committed to protecting the Personal Information you share with us. We utilize a combination of industry-standard security technologies, procedures, and organizational measures to help protect your Personal Information from unauthorised access, use or disclosure.

While we strive to protect your Personal Information, we cannot ensure the security of the information you transmit.

We recommend that you take every precaution in protecting your Personal Information when you are on the Internet. For example, change your passwords often, use a combination of letters and numbers when creating passwords, and make sure you use a secure browser. You can visit the Linksys website for more tips for using security features when connected to the Internet using a router.

Accessing your Personal Information

You have a right to access Personal Information you have shared with us, subject to some exceptions permitted by law. If you would like to access your Personal Information, please let us know. For security reasons, we may require you to put your request in writing.

Transact Property Group reserves the right to charge a fee for retrieving and providing access to your Personal Information.

If you're a user or visitor from the European Economic Area these rights also apply to you:

We are a data controller of your personal information for the purposes of the the General Data Protection Regulation 2016/679 (**GDPR**).

Your rights under the GDPR

Under certain circumstances, the GDPR grants you certain rights in relation to your Personal Information. In summary, you have the right to:

- request access to your personal information (known as a data subject access request)
- request rectification of incomplete or inaccurate personal information that we hold about you.
- request erasure of your personal information. We must comply unless there is a reason for us to continue to hold and process it
- object to processing of your personal information in certain circumstances, for example, if you feel our processing impacts on your fundamental rights and freedoms.
- request restriction of processing of your personal information.
- request the transfer of your personal information to you or to a third party.
- withdraw your consent if we are relying on consent to process your personal information.

To exercise any of the above rights please contact us as per the contact details below.

Marketing

As described above, we may use your personal information, including your contact details, to provide you with information about facilities, products, services and events, including those of third parties, which we consider may be of interest to you.

We may also provide your details to our service providers for specific marketing purposes, including to build a profile of your consumer behaviour.

Unsubscribing

You may opt out at any time if you no longer wish to receive marketing information from us. Each email we provide includes instructions on how you can unsubscribe from that particular service. You may also unsubscribe from Transact Property Group's various marketing communications by contacting us per the contact details below.

How to contact us

For further information, or to contact us on any matter described in this Privacy Policy, please contact us on 07 5353 6044, email us at admin@transactpg.com.au, or write to Transact Property Group at PO Box 622, Mooloolaba, QLD 4557. You may also lodge a complaint with the Office of the Australian Information Commissioner by telephone: 1300 363 992 or email: enquiries@oaic.gov.au