

## Group Privacy Policy

BlackWall Limited and WOTSO Property (collectively **Group**) are committed to protecting your privacy and the confidentiality of any personal information that we collect from you. We value your privacy and will not sell or trade your information.

This statement sets out the Group's policy for the collection, storage, use and disclosure of personal information, as contemplated in the *Privacy Act 1988* (Cth) (as amended) (**Privacy Act**). General information about privacy and the operation of the Privacy Act can be found at the Australian Federal Privacy Commissioner's website at [www.oaic.gov.au](http://www.oaic.gov.au).

### Compliance with the Privacy Act

The Group is committed to complying with the Privacy Act and the Australian Privacy Principles.

### Collection of Personal Information

To enable the Group to deliver the best possible service to its clients, tenants, contractors and security holders (**customers**), it is necessary for the Group to collect personal information. Personal information is information or an opinion that can identify an individual or from which the individual can be reasonably ascertained.

The type of personal information that is collected depends on the dealings you may have with the Group. Some examples of personal information that we may collect include your name, address, telephone number and date of birth.

We collect personal information from you which is reasonably necessary for the Group to:

- provide you with our products and/or services;
- administer and manage those products and services; and
- maintain your contact details.

We do not generally collect sensitive information about you. Sensitive information includes information or an opinion relating to racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, sexual preferences or practices, criminal convictions, membership of a professional or trade association or health information. If we do collect sensitive information, we will ask for your consent or otherwise in accordance with the law.

We generally try to collect personal information directly from you or your authorised intermediaries. Personal information is typically collected on application forms when you apply for our products or services. This information is generally stored electronically.

At the time personal information is collected, the Group will take reasonable steps to inform its customers about the purpose for which the information is collected, the customers' right to access the information and other matters contemplated in the Australian Privacy Principles regulating collection of personal information.

### Use and Disclosure of Personal Information

the Group is committed not to use or disclose personal information that it has collected, other than in the manner contemplated in the Australian Privacy Principles. In particular, the Group's policy is not



to use or disclose personal information other than for the purpose for which it was collected, or for any permitted secondary purpose (as contemplated by the Australian Privacy Principles). It is the Group's policy to obtain its customers' consent before it uses information for a purpose or in a manner different to the purpose or manner that was disclosed to its customer.

We may disclose your personal information to an organisation providing verification of your identity, including on-line verification of your identity where we are required to do so by law, such as under the *Anti-Money Laundering and Counter Terrorism Financing Act 2006* (Cth).

We may verify your identity using information held by a Credit Reporting Body (**CRB**). To do this we may disclose personal information such as your name, date of birth, and address to the CRB to obtain an assessment of whether that personal information matches information held by the CRB. The CRB may give us a report on that assessment and to do so may use personal information about you and other individuals in their files. Alternative means of verifying your identity are available on request. If we are unable to verify your identity using information held by a CRB we will provide you with a notice to this effect and give you the opportunity to contact the CRB to update your information held by them.

### **The Group's Marketing Activities**

It is important for the Group to maintain contact with its customers and potential customers. That contact may involve the sending of advertising material through the post or by email to existing and potential customers. In these circumstances, it is the Group's policy to comply with the stated purpose for which personal information was collected. The Group's existing and potential customers will always have the opportunity to decline to receive further marketing material. If the Group receives such a request it will update its records appropriately within a reasonable time.

### **Distribution of Information**

The Group employs a number of related and unrelated service providers in the course of its business activities. It is sometimes necessary for the Group to give its service providers access to personal information held about its customers. In these circumstances, it is the Group's policy to require these service providers to comply with the Group's privacy policy, which includes compliance with the Australian Privacy Principles. The Group does not intend to disclose personal information to overseas recipients.

### **Security of Personal Information**

The Group takes reasonable steps to protect personal information that it collects and ensure that the information is accurate. Secure servers are used to store customer information, which are protected in secure environments by passwords and security access IDs. The Group's employees are required to maintain the confidentiality of any personal information collected.

### **Access to and Changing Personal Information**

The Group will, if requested, give existing and potential customers copies of the personal information that it holds about them. Before such information is released, the Group will require reasonable proof of identity from the enquiring person. Any requests for copies of personal information should be directed to the Group's Privacy Officer. The Group will respond to requests for access within a reasonable period.

Any existing or potential customer may update or correct personal information held about them by the Group by written request addressed to the Group's Privacy Officer.

**Website(s)**

When the Group's website(s) is / are visited, the website(s) may send "cookies" to the visitor's computer. Cookies are used in transactions over the internet for various reasons including the maintenance of security. Cookies can also be used to monitor the areas of a website that are visited. Visitors to the Group's website(s) who do not wish to receive cookies should select the appropriate settings in their web browser.

**Amendments to the Group's Privacy Policy**

This policy may be updated and amended from time to time as required and at the Group's discretion.

**Complaints and Contacting the Group's Privacy Officer**

If you wish to make a complaint about privacy, you should contact the Group's Privacy Officer on the contact details below. Your complaint should be made in writing and include sufficient details of the complaint and any supporting documentation or evidence. Our Privacy Officer will consider the complaint and the steps that should be taken to resolve your complaint. We will deal with complaints within a reasonable time. If you are not satisfied with how we have handled your complaint, you may contact the Australian Privacy Commissioner at [www.oaic.gov.au](http://www.oaic.gov.au).

All communications to the Group Privacy Officer should be addressed to:

**BlackWall / WOTSO Privacy Officer**

50 Yeo Street  
Neutral Bay NSW 2089

Telephone: +61 2 9033 8611