

PRIVACY POLICY

Gazcorp Pty Ltd ABN 41 001 696 073 (Collectively “Gazcorp”, “we”, “us” or “our”) understands that privacy is an important individual right. Privacy is important to our own business and the businesses of our clients. This policy sets out our commitment to how we collect, maintain and store personal information. We are also bound to comply with the Australian Privacy Principles as set out in the *Privacy Act 1988* (Cth).

COLLECTION OF PERSONAL INFORMATION

We only collect personal information where it is necessary for our business purposes or if there is a legal requirement for us to do so. The types of personal information that Gazcorp collects will depend on the nature of your dealings with us. We will take reasonable steps to ensure that you know why we are collecting your personal information, what we use it for, to whom we may disclose it and how you can access it to ensure it is accurate and up to date.

We may collect information from a variety of sources, such as directly from you when you correspond with us, when you use our website or other resources, when you subscribe to our trade promotions or other publications or when you apply for a position of employment with us.

We will endeavour to collect all information directly from you. However, from time to time we may also collect information from other sources, such as from your nominated representative or Attorney or third parties such as government departments, recruitment agencies, previous employers and search providers in relation to property, bankruptcy and companies enquiries.

Generally, if you choose not to provide certain information to us, then we may not be able to provide you with certain services and you may not be able to use certain parts of our website or online services or participate in competitions or promotions that we run.

We may request the information from you, (including but not limited to the following information):

- your name, date of birth, address, phone number(s), email address and other contact details;
- payment information, which may include bank account or credit card details, and other information that we need in order to provide relevant goods and services to you, such as relevant identification;
- details of your interests and shopping preferences and activity;
- user names, passwords and other registration details that you provide when registering to use any of our websites, mobile applications or other services;
- details of your visits to, and use of, our websites, social media services, mobile applications, wifi and other online services, including the different parts of those services that you access during your visits, your IP address and the date and time which you access our websites;
- where you use our wifi or one of our mobile applications, information about your visits to our shopping centres collected through the wifi or mobile application, including device details (including device identifiers, usage and location data) This may include information about the different areas of a centre that you have visited and your present location within a centre;
- information submitted in forms, details of incidents involving you at our properties, enquiry/complaint details and records of communications; and
- other information that you provide to us.

Gazcorp's shopping centres, including those managed on behalf of third parties, are under video and camera surveillance. When entering Gazcorp's shopping centres, the personal information and images of individuals may be collected by Gazcorp. This information may be used by Gazcorp in connection with the management and security of the shopping centre generally, and may be provided to law enforcement and government bodies, insurers, Gazcorp staff and subcontractors, third parties who provide Gazcorp with services from time to time and retailers for these purposes.

USE AND DISCLOSURE OF PERSONAL INFORMATION

Gazcorp uses the personal information it collects for the purposes including:

- verification of your identity;
- provision of goods or services, including gift cards, that you order from us;
- the conduct of competitions or promotions for which you have registered and to otherwise perform any obligations and / or exercise any rights we have under any contracts between us;
- to meet our legal and regulatory obligations, including responding to lawful information requests from courts, government agencies and to protect our lawful interests;
- to help us improve the structure, layout and usability of our websites, social media services and mobile applications and to enable you to participate in any interactive features of those websites, social media services and mobile applications;
- to help us plan, operate and manage our shopping centres and other retail assets, including planning, product and service development, security, testing, customer relationship management and record management;
- to answer any questions you may raise, respond to any comments or complaints you may send us;
- to carry out market analysis and research;
- to market and promote the shopping centres and other retail assets that we manage, and any of the tenants of those shopping centres. We may send marketing or promotional materials to you where you subscribe to one of our newsletters or any other communication service, you request information about our services, you use our wifi or mobile applications or you provide your contact details to us and request that we contact you.
- where you use one of our mobile applications, to provide certain services and other functionality within the application. For example, we may assign you a unique customer identification number in order to collect information about your location within the shopping centre to provide a mapping service within the application.

Where Gazcorp engaged Service providers or suppliers or others to act on our behalf, we will take reasonable steps to protect the privacy of all information disclosed and require such parties to comply with any relevant privacy laws. You have the right to ask these organisations for access to information that they hold about you.

If we send your personal information outside of Australia we will require that the recipient of the information complies with the privacy laws and contractual obligations to maintain the security of the data.

We may disclose information about you to third parties where this is permitted by law including for any of the purposes mentioned within this section. These third parties include:

- our related bodies corporate

- service providers, for example custodians, brokers, unit registry services or correspondent banks
- other organisations who provide archival, auditing, professional advisory (including legal, accounting and business consulting), debt collection, banking, marketing, advertising, communication, mail house, delivery, recruitment, call centre, contract management, technology, research, analytics, utility, cleaning and security services and other persons/entities necessary for us to comply with a legal obligation or to perform any obligations under any contracts between us
- those to whom we outsource certain functions on a confidential basis, for example, direct marketing, statement production, information technology support
- owners of shopping centres for whom we provide property management or development services
- a buyer or prospective buyer of us or our business, shopping centres or other retail assets
- brokers, agents and advisers and persons acting on your behalf, for example a custodian, asset consultant or a person who holds a power of attorney, and
- government and law enforcement agencies or regulators where required or authorised by law or to assist in the prevention, detection and management of unlawful conduct such as fraud.

If we need to disclose your personal information for any other purpose, then we will obtain consent from you.

DATA QUALITY

Gazcorp will take reasonable steps to ensure that personal information it collects, uses and discloses is accurate and current.

If you believe any information that we hold about you is incorrect, incomplete or out-of-date, please contact us. Gazcorp will respond to your request within a reasonable period and will take reasonable steps to amend your records.

Gazcorp holds personal information in a combination of secure electronic and hard copy formats. We take all reasonable steps to ensure that any personal information held by us is protected from misuse, loss and unauthorised modification or disclosure. Such steps include, secure physical storage of documents within our office premises, network and communications security measures, staff training and destruction of data when it is no longer required.

No data transmission over the internet can be guaranteed as completely secure. So while we strive to protect such information, we cannot ensure or warrant the security of any information transmitted to us and individuals do so at their own risk.

Gazcorp will take reasonable steps to permanently de-identify or securely destroy personal information that it no longer requires, or upon request from you for any purpose except in limited permitted circumstances.

USE OF THE WEBSITE AND DATA PROTECTION

When you access our Website or any of our newsletters and publications, anonymous technical information (Cookies) may be collected about user activities on the Website. This may include information such as the date and time you accessed the Website, the type of browser used to access the Website and the page of the Website you visited and any

documents that you may have downloaded. This information is used by us to make decisions about maintaining and improving our Website and online services.

We provide links to useful websites on our Website. While we have confidence in these websites these linked sites are not under our control, and we cannot accept responsibility for the conduct of companies whose domain is linked to our website or whose domain links you to our website. Before disclosing your personal information on any other website, we advise you to examine the terms and conditions of using that website and its privacy statement.

ACCESS TO PERSONAL INFORMATION

You have a right to reasonable access to any information that Gazcorp holds about you. To request access to your information, please contact us by email at headoffice@gazcorp.com. At the time you make your request, we may ask you to provide a written request detailing the information you are seeking to access and if you are an authorised representative, to provide documented evidence that lawfully authorises you to act on the individual or company's behalf.

We reserve the right to charge for providing access to certain information, as permitted by law and you will be informed of this at the time of your request. We will always endeavour to matter your request for access within a reasonable timeframe and in the manner requested by you if it is reasonable to do so.

However, in some circumstances we may decline a request for access to information such as where we no longer hold the information, or where denying access is permitted or required by law. If we are unable to give you access to the information you have requested, we will give you written reasons for this decision when we respond to your request.

CONTACTING US / COMPLAINTS

If you have any questions, feedback or concerns about our Privacy Policy or how your personal information is handled by our firm, please contact us at:

Gazcorp Pty Ltd

Address: Level 10, 60 Park Street, SYDNEY NSW 2000

Post: PO BOX A2577 SYDNEY SOUTH NSW 1235

Phone: (02) 9817 7488

Facsimile: (02) 9879 0341

Email: headoffice@gazcorp.com

We will attend to your query or complaint within a reasonable timeframe. If you have a complaint or have made a complaint, you are not satisfied with our response and consider that the complaint has not be adequately resolved, then you may make a formal complaint to the Office of Australian Information Commissioner by calling them at 1300 363 992, online at www.oaic.gov.au or in writing to the Office of the Australian Information Commissioner, GPO Box 5218 Sydney NSW 2001.