

## PRECINCT URBAN PLANNING PRIVACY POLICY

Precinct Urban Planning Pty Ltd ACN 639 546 688, its subsidiaries, affiliates and related entities in Australia (together as “**Precinct Urban Planning**”, “**we**”, or “**us**”) are committed to protecting and managing personal information in accordance with the Australian Privacy Principles (“**APPs**”) established under the *Privacy Act 1988* (Cth) (“**Privacy Act**”) and in accordance with other applicable privacy laws.

The APPs provide a privacy protection framework that supports the rights and obligations of collecting, holding, using, accessing and correcting personal information. The APPs consist of 13 principle-based laws and apply equally to paper-based and digital environments.

This document is referred to as our **Privacy Policy**. It sets out our policies for managing your personal information including how we collect, use, hold, store and disclose the information.

In this Privacy Policy, “**you**”, “**your**”, or “**client**” refers to any individual about whom we collect personal information.

Broadly speaking, when we are referring to personal information, we are referring to information or an opinion about you, or information that is reasonably recognisable as you. It includes information or an opinion that may or may not be accurate and recorded in a hardcopy or electronic form.

When we refer to sensitive information, we are referring to certain personal information that is more sensitive and may include health information or details of memberships of professional associations. Under the APPs, sensitive information is afforded a higher level of privacy protection and requires us to obtain your consent before collecting this type of information.

This Privacy Policy applies to your personal information regardless of how we collect it from you. When you submit information to us, access or use our websites, or social media platforms, you are providing your consent to us collecting and managing your personal information according to this Privacy Policy.

### **About Precinct Urban Planning**

Precinct Urban Planning is an Australian based business and offers a range of services in the Town Planning and Development Industry. Precinct Urban Planning offers services such as statutory and strategic planning, development facilitation and management in relation to residential, rural, commercial and retail, industrial, mining and energy, mixed used and tourist developments. Precinct Urban Planning offers its services, in part, through its website, <https://www.precinctplan.com.au> (“**Website**”), and related social media channels. Precinct Urban Planning may also conduct research and development initiatives and provide access to other service providers and applications.

Precinct Urban Planning’s Website and related social media channels are not designed to provide town planning and development advice. The information provided or displayed on our Website or related social media channels does not consider your unique situation and needs. Please refer to our disclaimer for further information, which is accessible at <https://www.precinctplan.com.au/media/2492/website-disclaimer-precinct-urban-planning.pdf>.

This Privacy Policy is effective as of 15 March 2023. From time to time, we may need to change this Privacy Policy, and will upload the updated version on our website, which as at the date of this Privacy Policy is accessible at <https://www.precinctplan.com.au/privacy-policy>. Any such amendments to our Privacy Policy will take effect immediately after such uploading. Please check this Privacy Policy regularly for any updates.

### **What information do we collect about you?**

When you enquire about our services or become a client of Precinct Urban Planning, a record is made that includes your personal information.

The types of information that we collect will vary depending on the circumstances of collection and the kind of service that you request from us, and may likely include:

- Contact Information & Personal Data: your name, date of birth, age, gender, address, email address, and telephone details.
- Government Related Identifiers: your tax file number, Medicare number, Individual Healthcare identifier and others.
- Sensitive Information: In limited circumstances, we may collect information that is considered sensitive information. For example, professional affiliations or memberships.
- Payment Details: your credit card, bank account details, and billing information to complete purchases.
- Financial Details: your financial details and occupation, which may include budget information, wages/salary information, and general expenditure.
- Employer & Profession: your professional details and information about your employer or an organisation you represent.
- Identification Documents: your driver's licence, passport or other photographic identification documents.
- Photographs & Videos: any pictures, videos, sound recordings and other audio-visual recordings that you provide to us, or authorise us to take of you.
- Social Media Accounts & Handles: your social media accounts, handles, and other personal websites and profiles.
- Geo-Location & Locality Information: when you interact with us, we may collect your current or last known location used to determine your locality from other individuals. We may achieve this through various methods, including collecting your Wi-fi, Guidance Positioning System (GPS), Cellular or other technology in your electronic device or web browser.
- Cookies & Other Browser or Device Information: your session cookies and persistent cookies when you visit our website, your device type, browser type, Internet Protocol (IP) address, your URL information, the date and time (including time zone) of your visit, the pages you have accessed on our websites and third party websites, your software and hardware information concerning your mobile device or computer. Cookies that we place may be removed by following instructions that are provided by your browser.
- Interaction & Behavioural Information: your interactions, use, habits, behaviours when dealing with us, our website and other applications.
- Employment Information: We collect personal information when recruiting personnel, such as your name, contact details, qualifications and work history. Generally, we will collect this information directly from you. We may also collect personal information from third parties in ways which you would expect (for example, from recruitment agencies or referees you have nominated). Before offering you a position, we may collect additional details such as your tax file number and superannuation information and other information necessary to conduct background checks to determine your suitability for certain positions (for example, positions which involve working with children).
- Other Information: any other administrative and additional information that you provide to us, or authorise us to collect, as a part of your interaction with Precinct Urban Planning.

Precinct Urban Planning may collect personal information about other individuals who are not clients of Precinct Urban Planning. This includes customers and members of the public who participate in events we are involved with, individual service providers and contractors to Precinct Urban Planning, and other individuals who interact with us on a commercial basis. The kinds of personal information we collect will depend on the capacity in which you are dealing with Precinct Urban Planning. Generally, it would include your name, contact details, and information regarding our interactions and transactions with you.

If you are participating in an event we are managing or delivering, we may take images or audio-visual recordings which identify you.

You can always decline to give Precinct Urban Planning any personal information we request, but that may mean we cannot provide you with some or all of the services you have requested. If you have any concerns about the personal information we have requested, please let us know.

### **How and why do we collect and use your personal information?**

Precinct Urban Planning collects personal information reasonably necessary to carry out our business, assess and manage our clients' needs, and provide our services. We may also collect information to fulfil administrative functions associated with these services, for example billing, entering into contracts with you or third parties and managing client relationships.

Precinct Urban Planning generally collects personal information directly from you. We may collect your personal information over the phone, by email, through our website or mobile sites, over the internet or when you visit one of our social media sites (such as Facebook, LinkedIn, Twitter, or Instagram), or when you visit one of our offices in person.

We may also collect personal information about you from other sources, for example:

- an authorised person acting on your behalf;
- our affiliated and related entities;
- third-party agents, suppliers and contractors who assist us in operating our business;
- recruitment service providers and any referees provided on employment applications;
- payment and debit service providers processing and managing the transaction on our behalf; and
- your family and friends through any marketing or promotional activity that we conduct.

We may receive information about you that we have taken no active step to collect. If this does occur, we recommend contacting us and asking for the personal information to be de-identified or destroyed.

The purposes for which Precinct Urban Planning usually collects and uses personal information depends on the nature of your interaction with us, but may include:

- communicating with you confirming your identity;
- responding to requests for information, complaints and enquiries;
- administrative, management and operational purposes;
- informing you about our business offerings, news, updates, direct marketing material, activities, facilities, services and events;
- managing, planning, advertising and administering programs, events, competitions and performances;
- researching, developing and expanding our facilities and services;
- recruitment processes (including for volunteers, internships and work experience);
- taking photographs, videos or other audio-visual recordings of you for testimonial, marketing or other promotional purposes;
- market research purposes and to improve our business offerings;
- via mobile device applications, widgets and other interactive features used, operated or owned by us;
- through surveillance and security cameras that capture your image;
- processing your purchases, orders, transactions or sales, including the processing of payments, arranging shipping and providing you with tax invoices or order confirmations;
- for any other purposes (including secondary purposes) that you would reasonably expect; and
- to enable us to comply with our obligations under the law.

You can always decline to give us your personal information, but that may mean that we cannot provide you with some or all of the services you have requested.

### **Who do we disclose your personal information to?**

During the conduct of our business, we may use and disclose your personal information to the following parties:

- our affiliated and related entities;
- our engaged contractors, agents, suppliers who assist us in operating our business;
- commercial partners under an agreed information sharing arrangement;
- payment and debit service providers and processors;
- our marketing research service providers and digital marketing agents;
- third party website service providers and website plugin or widget service providers;
- our professional advisors, such as our lawyers, accountants and financial advisors;
- relevant courts, tribunals or regulatory authorities, and law enforcement bodies;
- anyone else to whom you authorise us to disclose your information or that would be reasonably expected; and
- other companies or individuals as necessary to enable us to provide you with our services.

Precinct Urban Planning takes reasonable steps to ensure that the third parties we engage take reasonable steps to protect your personal information following the APPs and in a similar manner with this Privacy Policy. Our third-party service providers are required only to use the personal information disclosed to them by us for the purpose that it was provided to them. Additionally, the third parties to

who we have disclosed your personal information may contact you directly to let you know they have collected your personal information and give you information about their privacy policies.

Precinct Urban Planning may also use Google Analytics to help us understand how our customers and clients use our platforms, services. You can read more about how Google uses your personal information via <https://www.google.com/intl/en/policies/privacy>. You may also opt-out of Google Analytics here: <https://tools.google.com/dlpage/gaoptout>.

### **Do we disclose personal information to overseas recipients?**

Your personal information will not be disclosed to recipients outside Australia unless you expressly request us to do so. If you ask us to transfer your personal information to an overseas recipient, the overseas recipient will not be required to comply with the APPs, and we will not be liable for any mishandling of your information in such circumstances. We also disclaim responsibility to the extent permitted by law, and note that you may not have a remedy under Australian law.

### **Do we use or disclose your personal information for direct marketing?**

Precinct Urban Planning may use or disclose your personal information to inform you about our services, upcoming promotions and events, or other opportunities that may interest you. If you do not want to receive direct marketing communications, you can opt-out at any time by contacting us using the contact details below.

If you opt-out of receiving marketing material from us, we may still contact you concerning any ongoing relationship with you.

### **How do we hold, store and secure your personal information?**

Precinct Urban Planning takes reasonable steps to protect your personal information from misuse, interference and loss and from unauthorised access, modification, or disclosure. For example, we may maintain computer and network security, use firewalls and other security methods and other security systems such as user identifiers and passwords to control access to our computer systems.

Please be aware that there is no transmission method over the internet or through electronic storage that is fully secure and safe. We cannot guarantee the security of the personal information that we hold, but we do take reasonable steps to protect your information. If we are required by law to inform you of any misuse, interference, loss, or unauthorised use of your personal information, then we will notify you electronically, in writing, or by telephone.

Our websites, applications, or email systems may not use encryption or other technologies to ensure the secure transmission and receipt of information via the internet. Anyone using our website or receiving an email from us is encouraged to exercise care in sending personal information or depositing money via the internet. We recommend that you refrain from clicking any unsecured links or opening unknown attachments.

If you hold any concerns or become suspicious of any misuse, interference, loss, or unauthorised access to our website, our email systems or to our business more generally, we ask that you contact us immediately to verify your concern or suspicion.

Precinct Urban Planning hold and store your personal information in paper-based files, other electronic record keeping methods in secure databases (including trusted third party storage providers based in Australia), which may include cloud-based storage providers.

#### Paper-based Storage

Personal information may be collected in paper-based documents and converted to electronic form for use or storage (with the original paper-based documents either archived or securely destroyed).

#### Electronic Storage

Your personal information is usually collected in electronic form.

#### Third-Party Storage

Your personal information may be collected in electronic form for use or storage with a third-party storage provider that we engage.

We cannot ensure that your personal information is or will remain secure. This is due to us not having control over the third-party provider's policies and procedures concerning the handling and storing of your personal information.

### **What are the choices that you can make about your personal information?**

At any time, you can request us to:

- delete or destroy your personal information;
- de-identify your personal information;
- access or correct your personal information;
- provide you with a copy of your personal information.

Please understand that we may not be able to entertain your request if it is unlawful to do so or is otherwise impractical or unreasonable to do so in our discretion.

#### Delete or destroy your personal information

Until you request for it to be deleted or destroyed, your personal information is kept by us for as long as necessary to provide our services to you and for legitimate and essential business purposes, such as complying with our legal obligations or settling disputes. This means that your personal information can be held for some time.

#### Remaining Anonymous & De-Identification

Precinct Urban Planning may require you to provide specific details and information to enable us to provide our services to you. We try to allow you to stay anonymous or use a pseudonym in your dealings with us where it is lawful and practicable to do so. For example, when making a general and nonspecific enquiry. Typically, it is not possible for us to deal with you anonymously or pseudonymously on an ongoing basis. If we do not collect your personal information, you may not be able to utilise our services, deal with us or participate in our events, programs or activities we manage or deliver.

#### Accessing or correcting your personal information

You are entitled to access or request a copy of your personal information held by us by sending us a request. You will not be charged for requests to access or copy your personal information, but you may be charged for the reasonable time and expense incurred in compiling the information.

You are responsible for ensuring that your personal information with us is accurate and up to date. We take steps to ensure that the personal information we collect, use or disclose is accurate and up to date. You can help us do this by letting us know if you notice errors, inaccuracies, or discrepancies in the information we hold about you and letting us know if your details change.

We may decline your request to access or correct your personal information in accordance with the APPs. If we refuse your request, we will provide you with a reason for our decision and, in the case of a request for correction, we will include a statement with your personal information about the requested correction.

### **Does the European Union General Data Protection Regulation apply to us?**

The European Union (**EU**) General Data Protection Regulation (**GDPR**) contains new data protection requirements and is effective as of 25 May 2018. GDPR replaces national privacy and security laws that previously existed within the EU with a single, comprehensive EU-wide law that governs the use, sharing, transferring and processing of any personal data that originates from the EU. The GDPR applies to the data processing activities of businesses, regardless of size, that are data processors or controllers with an establishment in the EU.

Consequently, Australian businesses of any shape and size may need to comply if they have an establishment in the EU, if they offer goods and services in the EU, or if they monitor the behaviour of individuals in the EU. There are also some notable differences, including certain rights of individuals (such as the 'right to be forgotten') which do not have an equivalent right under the APPs and the Privacy Act.

Currently, the GDPR does not apply to our business as Precinct Urban Planning does not currently offer our services to individuals located in Europe, our website does not explicitly target customers located in the EU nor do we monitor the behaviour of individuals in the EU.

### **What should you do if you have a complaint about the handling of your personal information?**

You may contact us at any time if you have any questions or concerns about this Privacy Policy or about how your personal information has been handled. You may make a complaint to our privacy officer using the contact details set out below.

#### Complaint handling process

Our Privacy Officer will first consider your complaint to determine whether there are simple or immediate steps that can be taken to resolve the complaint. We will contact you within thirty (30) days of the date we receive the written details of your complaint to acknowledge that we have received it. We may ask you to provide further information about your complaint and the outcome you are seeking.

Our privacy officer will review the way we dealt with your personal information, conduct an internal investigation (if necessary) into the complaint and will likely respond to you within thirty (30) days of the date we acknowledged receipt of your complaint. We will then typically gather relevant facts, locate and review relevant documents and speak with individuals involved.

In most cases, we will investigate and respond to a complaint within sixty (60) days of receipt of the complaint. If the matter is more complex or our investigation takes longer than anticipated, we will let you know.

If you are not satisfied with our response to your complaint, or you consider that Precinct Urban Planning may have breached the APPs or the Privacy Act, a complaint may be made to the Office of the Australian Information Commissioner (**OAIC**). The OAIC can be contacted by telephone on 1300 363 992 or by using the contact details on the website [www.oaic.gov.au](http://www.oaic.gov.au).

### **Our contact information**

We welcome any comments or questions about our Privacy Policy. All enquiries should be directed to Precinct Urban Planning's Privacy Officer at the following contact details:

**Attention:** Privacy Officer

**Telephone:** [07 4632 2535](tel:0746322535)

**Email:** [info@precinctplan.com.au](mailto:info@precinctplan.com.au)

This Privacy Policy was last updated on 15 March 2023.