

2021
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**VARSITY TOWERS UTILITIES
MANAGEMENT RIGHTS PTY LTD**

PRIVACY POLICY

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1. Our Commitment to Your Privacy

Privacy is a valid concern for Internet users, as well as companies doing business on the Internet. We are committed to the privacy rights of our users, and fully disclose our Privacy Policy below so our users can understand what kind of information we capture, and how we subsequently use that information. All personally identifiable information is managed in accordance with our Privacy Policy ('Policy') outlined below.

Varsity Towers Utilities Management Rights (ABN: 52 616 241 519) is bound by the National Privacy Principles ("NPPs") under the *Privacy Act 1988 (Cth)* ("Privacy Act") in the way that it handles personal information. This Policy explains how We handle personal information relating to individuals, whether they are customers of ours or not.

2. Terminology

In this Policy, the expression "we", "us" and "our" are a reference to Varsity Towers Utilities Management Rights Pty Ltd.

The expression "personal information" is given its meaning under the *Privacy Act*. As at the date of this Policy, the expression "personal information" when used in this Policy, refers to information or an opinion about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.

3. Data Security

We will take reasonable steps to protect the personal information which we hold from misuse or loss and from unauthorised access, modification or disclosure.

When using our website, you should be aware that no data transmission over the Internet can be guaranteed to be totally secure. We do not warrant the security of any information transmitted over the Internet, although we strive to protect such information. By using our website, you accept that information will be transmitted to and from our website at your own risk.

4. Openness

From time to time, we may change our policy on how we handle personal information or the sort of personal information which we hold. Any changes to our policy will be published on our website.

5. Access, Correction and Further Information

We will provide you with access to your personal information held by us, unless we are permitted under the *Privacy Act*, to refuse to provide you with such access. Please contact us if you:

- Wish to have access to the personal information which we hold about you;
- Consider that the personal information which we hold about you is not accurate, complete or up to date; or
- Require further information on our personal information handling practices

For most requests, access to your personal information will be provided free of charge. However, we may charge a reasonable fee in accordance with the *Privacy Act* if your request requires a substantial effort on our part.

6. Updates to our Privacy Policy

We may amend or replace our privacy policy from time to time. Any changes to this Privacy Policy will be published on our website.

7. Information Collection

We only collect personal information to the extent that this is:

1. Necessary for us to carry out our core business as utility managers; or
2. Incidental to the carrying out of our core business.

Personal information will generally only be collected for the purposes of enabling us to liaise with individuals who are, or who are associated with, customers potential customers, contractors or sub-contractors.

The types of personal information which we may collect and hold in these circumstances include, without limitation, an individuals' name, address, phone number, e-mail address and other contact details.

We may collect personal information from you in a variety of ways including, without limitation, on forms, questionnaires and surveys, by our website, over the telephone or person to person.

We may collect “de-identified information” through your use of our website, including the dates and times you access our website, the domains from which you visit our website, your activity on our website and Internet Protocol addresses. This information is referred to as “click stream data” and we may use this data to analyse trends and statistics in order to improve our websites and services. We collect this data using various technologies, including “cookies”. A “cookie” is a text file that our website sends to your browser which is then stored on your computer as an anonymous tag identifying your computer (but not you) to us. You can set your browser to disable cookies. However, some parts of our websites may not function properly or at all if cookies are disabled.

Some pages on our website and emails created by our website may also contain a “web beacon”. A web beacon is a clear-pixel image which enables us to monitor your Internet activity. When you view a page containing a web beacon, a de-identified notice of your visit is generated which we may process. A web beacon generally works in conjunction with a cookie. If a person disables cookies, a web beacon will be able to generate an anonymous notice of the visit but which cannot be associated with the information contained in a cookie.

8. Information Use and Disclosure

We will not use or disclose personal information that we collect for any purpose other than the primary purpose of collection unless:

1. Such use is related to the primary purpose and you would reasonably expect us to use or disclose the information for that other purpose;
2. In the case of direct marketing not related to our activities – we have obtained your prior consent (unless it is not reasonably practicable to seek your consent and we otherwise comply with the requirements of the *Privacy Act*); or
3. The use or disclosure is otherwise permitted under the *Privacy Act*

As a general rule, we do not engage in direct marketing activities. To the extent that we do not engage in direct marketing in the future, however, you may at any time request us not to provide you with any further direct marketing communications by contacting us.

By using our website, you will be deemed to consent to us using your personal information collected by our website for the following purposes:

1. Notifying you about any changes to the information which currently exists on the website;
2. Notifying you in the future about new information relevant to our services; and
3. Monitoring your use of our website

In providing you with goods or services we may need to disclose your personal information to certain third parties including, without limitation, contractors assisting in the provision of the goods or services as part of our core business activities.