

## RetPro Privacy Policy

### 1 Privacy and Security Policy

RetPro Pty Ltd ACN 140 217 796 and all our related entities including but not limited to RetPro Advisory Pty Ltd ACN 619 806 763 and RetPro Management Pty Ltd ACN 155 736 771 (collectively, **RetPro, us, we, our**) are committed to protecting the privacy of your personal information in accordance with the *Privacy Act 1988* (Cth) including the Australian Privacy Principles (**APPs**).

This policy is intended to provide a general overview of our policies for the handling of your personal information. Other policies may apply instead of or in addition to this Privacy Policy in certain circumstances.

By using our website at [www.retprogroupp.com.au](http://www.retprogroupp.com.au) (**Website**) and/or providing your personal information to us you consent to us handling your personal information in accordance with this Privacy Policy.

### 2 Collection of your personal information

We may collect personal information about you in the course of your dealings with us as a specialist retail property service provider. Our services include property management services for commercial tenancies such as managing tenant applications and performing other enquires in relation to proposed commercial tenancies. We also offer property advisory services for shopping centres and commercial tenancies.

We collect personal information as part of these services, such as personal information of property owners, prospective and existing tenants and other individuals involved in transactions related to the properties, such as guarantors. We may also collect personal information from you in connection with other dealings you may have with us, such as if you make a general enquiry with us or if you apply for a position with RetPro.

The type of personal information we collect will depend on your dealings with us. Generally, we will collect your name, address, contact details (including telephone number, fax number and email address), business details (ABN, business name and your position within the company - if applicable), payment details and information about your use of the products and services that we supply.

Depending on your arrangements with us, we may also collect credit information about you in accordance with our credit policy. For example, if you are an individual who is applying to become a tenant or guarantor for a tenant under a commercial tenancy that we are managing. You will be provided with further information if this applies to you. You may also view a copy of our credit policy is available on our Website.

We may also collect other personal and sensitive information from you (for example, if you are applying for a position with RetPro then the personal information we collect may include your resume, qualifications, skills, education provider and history, work history and residency status).

We generally only collect information that is necessary for our business functions. We generally collect your personal information directly from you, unless it is impracticable or unreasonable to do so. From time to time we may collect personal information about you from third parties (for example, from publicly available sources, our agents, our clients or contractors, and from other third parties such as other contractors engaged by our clients).

If you provide us with personal information about a third party, you represent, and we collect it on the basis that, you have that person's consent for us to collect and handle their personal information in accordance with this Privacy Policy.

If we are unable to collect the personal information we require, or the information provided is incorrect or incomplete, this may affect our ability to provide products or services to you.

### **3 Purposes for which personal information is collected, held, used and disclosed**

We generally use and disclose your personal information for the purposes for which we collected it as described above, and for other related purposes that you would reasonably expect.

Generally, these purposes include responding to your enquiries, providing you with products and services, handling payments and refunds, providing you with marketing information or special offers for our products and services, obtaining your feedback on your customer experience, conducting marketing and other promotional activities and for our general business operations (for example, maintenance of our business records, compliance with our legal and insurance obligations and statistical purposes).

By providing us with your personal information, you agree that we may send you marketing and promotional communications by post or by electronic means (including e-mail and SMS). You can opt-out of marketing and promotional communications at any time using an opt-out mechanism in one of our communications, or by contacting RetPro via the details shown below.

We may exchange your personal information within the RetPro, and may disclose your personal information to our licensees, agents, clients, contractors and/or promotion partners for the purposes set out above.

Apart from the above instances, we may also use and disclose your personal information with your consent and as otherwise required or permitted by law.

### **4 Sensitive Information**

We generally only collect 'sensitive information' with your consent. We will assume that you have consented to us collecting all information which is provided to us by you for use in accordance with this Privacy Policy, including any 'sensitive information', unless you tell us otherwise at the time you provide it to us.

### **5 Storage and security of your personal information**

We may hold your personal information in electronic formats or in hard copy. We take reasonable steps to securely store your personal information to ensure it is protected from unauthorised access, modification and disclosure, and from other types of misuse, interference and loss.

We generally take reasonable steps to destroy or permanently de-identify your personal information when we no longer require it for any purpose for which it was collected. We may retain your personal information for as long as necessary to comply with any applicable law, for insurance and corporate governance purposes, for the prevention of fraud and to resolve disputes. Your personal information may also be retained in our IT system back-up records.

The transfer of data over the Internet is inherently insecure. We cannot guarantee the security, during transmission, of any personal information provided to us via our website at [www.RetProgroup.com.au](http://www.RetProgroup.com.au). Please bear this in mind when transmitting information by this means to us.

## **6 Access and correction of your personal information**

You may lodge a request to correct personal information that we hold about you if you believe it is inaccurate, incomplete, out-of-date, irrelevant or misleading, in which case please contact our Privacy Officer via the contact details shown below.

You may request that we provide you with access to the personal information we hold about you. Generally, we will provide you with access, except in limited circumstances where the law permits us to deny access. Any such requests must be made in writing to RetPro via the details shown below. No fee will be incurred for requesting access, but if your request for access is accepted we will inform you of the fee (if any) that will be payable for providing access if you proceed with your request.

## **7 RetPro website**

Our website at [www.RetProgroup.com.au](http://www.RetProgroup.com.au) uses cookies. We do not use the information stored in those cookies to collect information about you or your computer. The cookies are used for statistical purposes and to assist with your use of the website. We may also collect click-stream data when you use the website, such as the date and time of your visit, the pages you accessed, your IP address, the type of browser and operating system you are using and the websites you come from and move to. This information is collected for statistical purposes to assist us to find out how our website is used and navigated and to improve our website.

The RetPro website may contain links to third party websites. We are not responsible for the privacy, security or handling of your personal information via those websites. You should review the privacy policy and terms of use for those websites each time you visit them.

## **8 Overseas disclosure of your personal information**

Depending on the particular service we have engaged to perform, it may be necessary and we may disclose your personal information to recipients in New Zealand and a number of countries in the European Union. Otherwise, generally we will not disclose your personal information to overseas recipients, except with your consent or where we are required or authorised to do so by law.

## **1 Changes to our Privacy Policy**

We may amend, modify or replace this Privacy Policy at any time. You should review our Privacy Policy each time you visit our website or provide us with personal information.

## **9 Complaints**

If you have a complaint about the way in which we handle your personal information, please contact us on the details below. We will confirm receipt of your complaint and set out the time frame we require to investigate your complaint and provide you with a response, which generally, will be within 14 days of receiving your complaint.

## **10 Contact us**

If you would like further information about the way we manage your personal information or if you have a complaint, please contact RetPro by telephone on +61 3 9693 7400, by mail Attention: Privacy Officer, RetPro, Level 4, Hanover House, 158 City Road, Southbank VIC 3006, or by email at [privacy@RetProgroup.com.au](mailto:privacy@RetProgroup.com.au).