

## PRIVACY POLICY

### General

The Devine Group comprised of Devine Limited and its affiliated entities (referred to in this document as **we, us** or **our**) recognise that your privacy is important and we are committed to protecting the personal information we collect from you. The *Privacy Act 1988* (Cth) (**Privacy Act**), Australian Privacy Principles and registered codes govern the way in which we must manage your personal information. This policy sets out how we collect, use, disclose and otherwise manage your personal information.

### Collection

#### What is personal information?

Personal information means information or an opinion about an identified individual, or an individual who is reasonably identifiable whether the information or opinion is true or not and whether the information or opinion is recorded in a material form or not. Examples of personal information include your home address, telephone number, name, and employment details.

#### Types of information collected

We may collect and hold personal information about you, that is, information that can identify you, and is relevant to providing you with the products and services you are seeking. The kinds of information we typically collect include name, address, phone number, facsimile number, email address, place and type of business and/or other information relevant to providing you with the services and products you are, or someone else you know, is seeking.

#### Method of collection

Personal information will generally be collected directly from you through the use of any of our standard application forms, in a meeting with you, over the internet, via email, or through a telephone conversation with you.

There may, however, be some instances where personal information about you will be collected indirectly because it is unreasonable or impractical to collect personal information directly from you. We will usually notify you about these instances in advance, or where that is not possible, as soon as reasonably practicable after the information has been collected. For example, we may also collect personal information about you from third parties, including referrals from our existing customers, your employer, or from third parties acting on your behalf (for instance, financial advisors).

#### Purpose of collection

The personal information that we collect and hold about you, depends on your interaction with us. Generally, we collect, use and hold your personal information for the purposes of:

- Providing products and services to you or someone else you know, including new units, townhouses and detached housing developments, house and land packages and prices, plans and specifications, special offers and finance packages;
- Determining your ongoing requirements (if any) and provide appropriate advice on our range of products and services;
- Assessing your application to purchase products and services from us;
- Providing you with information about other services that we offer that may be of interest to you;
- Attending to the administration associated with the provision of our wide range of products and services;
- Analysing our services and products with a view to improving our range of products and services;
- Identifying you for the purpose of our ongoing business relationship; and
- Facilitating our internal business operations, including the fulfilment of any legal requirements.

Further, we may imply that you have provided consent for us to collect and use your personal information by reference to your conduct. Instances of this may include telephone calls that you may make to our offices for the purpose of making enquiries about our products and services. Should you have any concerns about how your personal information is dealt with, including the way in which it is collected, managed or maintained by us, you may have regard to this privacy policy.

## **Failure to provide information**

Without your personal information, such as your name, address and other essential details, it is not possible for us to conduct its business and accordingly, we will not be able to provide you, or someone else you know, with the full range of our products and services on offer throughout our various locations.

## **Use and disclosure**

Generally, we only use or disclose personal information about you for the purposes for which it was collected (as set out above). We may disclose your personal information where you have provided your consent to do so. This consent for the disclosure of your personal information may be given explicitly either in writing or verbally or may be implied from your conduct such as when you make an application for a new house or house and land package and further indicate that you wish to be provided with assistance in terms of finance. We may disclose personal information about you to:

- our related entities to facilitate our and their internal business processes;
- third party service providers, who assist us in operating our business (including technology service providers), and these service providers may not be required to comply with our privacy policy. These providers may be based overseas or use overseas infrastructure to perform services for us, including the USA; and
- our related entities and other organisations with whom we have affiliations so that those organisations may provide you with information about services and various promotions.

In some circumstances, the law may permit or require us to use or disclose personal information for other purposes (for instance where you would reasonably expect us to and the purpose is related to the purpose of collection).

## **Marketing**

As our products and services change, we will, from time to time, use your personal information to provide you with updated information about our range of products and services. You have the right to 'opt out' or 'unsubscribe' to request that we do not provide you with such material or information, and should you not wish to receive it, simply contact the office concerned and advise us accordingly. Once we have been informed that you no longer wish to receive information about our products, we will endeavour to remove you from our mailing list promptly. You may, at any stage, opt to change your mind about receiving such information.

We do not disclose your personal information to any unrelated party to us for the express purpose of allowing them to direct market their products or services to you, unless we have your consent to do so.

## **Sensitive information**

Sensitive information is a particular kind of personal information that requires even greater care. By way of summary, sensitive information can be information about your political opinion, racial or ethnic origin, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or a trade association, membership of a trade union, sexual orientation or practices, criminal record, or information about your health. We only collect, use or disclose sensitive information about you with your consent.

## **Security**

We store your personal information in different ways, including in paper and electronic form. The security of your personal information is important to us. We take reasonable measures to ensure that your personal information is stored safely to protect it from misuse, loss, unauthorised access, modification or disclosure, including electronic and physical security measures. We use advanced technology in relation to any online transactions. Such measures are regularly updated and reviewed to maintain security.

## **Access and correction**

You are entitled to request access to personal information that we may hold about you, by making a written request. We may charge you a reasonable fee in order to cover the cost of the retrieval of the information and the copying and supply of it to you (but we do not charge you for making a request for access).

Generally, all requests for access to any personal information will be handled as quickly as possible and should be processed within thirty (30) days of receipt of the request. Occasionally, some requests for access may require longer than the thirty (30) day period, and this will depend upon the nature of the personal information being sought.

We may refuse a request for access to personal information in circumstances prescribed by the Privacy Act, and if we do, we will provide you with a written notice that sets out the reasons for the refusal (unless it would be unreasonable to provide those reasons). If, upon receiving access to your personal information, or at any other time, you believe the personal information we hold about you is inaccurate, incomplete or out of date, please notify us immediately. We take reasonable steps to correct the information so that it is accurate, complete and up to date.

If we refuse to correct your personal information, we will provide you with a written notice that sets out the reasons for our refusal (unless it would be unreasonable to provide those reasons) and provide you with a statement regarding the mechanisms available to you to make a complaint.

### **Complaints and feedback**

If you wish to make a complaint about a breach of the Privacy Act, Australian Privacy Principles or a privacy code that applies to us, please contact us as set out below and we will take reasonable steps to investigate the complaint and respond to you. If you are not happy with our response, you may complain directly to the federal Information Commissioner. If you have any queries or concerns about our privacy policy or the way we handle your personal information, please contact our Privacy Officer at:

Street address: Level 1, 485 Kingsford Smith Drive, Hamilton, QLD, 4007

Email address: [privacyofficer@devine.com.au](mailto:privacyofficer@devine.com.au)

Telephone: 07 3608 6300

Facsimile: 07 3608 6333