

# Privacy Policy

## 1. Privacy generally

This privacy policy applies to the handling of personal information by Blueways Group Pty Ltd (ACN 602 991 711) of 'UL40 Chadstone Shopping Centre', Level 2, 1341 Dandenong Road, Chadstone, Victoria 3148 and our related entities (Blueways, we us, our).

Blueways understands the importance of protecting the privacy of an individual's personal information. This privacy policy sets out how Blueways aims to protect the privacy of your personal information, your rights in relation to your personal information managed by Blueways and how Blueways collects, holds, uses, discloses, and otherwise manages, your personal information.

In collecting, holding, using, disclosing and otherwise managing your personal information, Blueways will comply with the Privacy Act 1988 (Cth) (Privacy Act) and the Australian Privacy Principles in the Privacy Act. Blueways will regularly review its policies and procedures regarding personal information and may therefore update and amend this privacy policy from time to time. Any updated privacy policy will be made available on <https://bluewaysgroup.com/> and any of our other websites or can otherwise be obtained by contacting us and requesting a copy.

## 2. Kinds of personal information collected

Blueways is a developer of residential real estate communities and undertakes related property development activities. In conducting this business, we may collect personal information.

Personal information is information or an opinion about an identified, or reasonably identifiable, individual.

The kinds of personal information that Blueways collects will vary depending on our particular interaction or dealing with you. However, generally speaking, the kinds of personal information Blueways collects may include:

- (a) your contact information such as your name, address, telephone number, email address and date of birth;
- (b) proof of identify information such as your driver licence, passport or other similar identity information;
- (c) information regarding your preferences regarding our products and services (including information regarding the residential developments, housing or lifestyle amenities that may be of interest to you or your family);
- (d) details regarding the transactions you undertake in respect of any Blueways developments; and
- (e) other information necessary to provide you with information regarding our products or services or undertake any transactions or dealings with you.

Blueways may also hold other kinds of personal information as permitted or required by law or other kinds of personal information that we notify you of at or about the time of collection.

Generally, we do not collect sensitive information about individuals. Information about your health, racial or ethnic origin, political persuasions, criminal record and religious or philosophical beliefs are all examples of sensitive information. If we do need to collect sensitive information about you, we will only do so with your consent or where we are required or permitted to do so by law.

## 3. How we collect personal information

Generally, Blueways collects your personal information directly from you. For example, Blueways may collect your personal information:

- (a) when you request information or services from us;
- (b) where you enter into, or propose to enter into, a transaction with us, including the purchase of property;
- (c) where you use our website or other services or otherwise interact with us; or
- (d) if you post information to any of our social media sites or interact with us on social media.

Generally, Blueways will only collect your personal information from sources other than you if it is unreasonable or impracticable to collect that personal information from you. However, in some cases, Blueways may collect your personal information from someone other than you, for example, from:

- (e) Wolfdene Pty Ltd (Wolfdene), who provide services to us in relation to the property developments we undertake. Wolfdene may collect information from you where you visit a display centre for our property developments, submit an enquiry via a website for our property developments or attend an event at which our property developments are promoted;
- (f) other service providers that help us provide our services;
- (g) third parties you authorise to disclose your information to us; and
- (h) a publicly maintained record or other publicly available sources of information including social media and similar websites.

#### **4. Purposes for which personal information is used**

Generally speaking, Blueways collects and uses personal information so that we can develop, improve and promote our services and conduct our property development business.

Some examples of the purposes for which Blueways collects, holds, uses and discloses your personal information include to:

- (a) communicate with you;
- (b) respond to your queries and provide you with information you request from us;
- (c) conduct our property development business and supply our services to you;
- (d) develop and improve the products and services we provide and the residential communities we develop;
- (e) administer, manage and process any transactions you enter into, or propose to enter into, with us, including the purchase of property;
- (f) help us to manage the services we provide to you; and
- (g) comply with our obligations under any applicable laws.

In addition to the purposes listed above, Blueways may use your personal information for other purposes which we notify you of when we collect the information and for purposes otherwise permitted or required by law.

Where personal information is used or disclosed, Blueways takes steps reasonable in the circumstances to ensure it is relevant to the purpose for which it is to be used or disclosed. You are under no obligation to provide your personal information to Blueways. However, without certain information from you, Blueways may not be able to provide services or information to you or may be limited in how we can interact with you.

In addition to the purposes outlined above, Blueways may use and disclose your personal information in order to inform you of promotions, competitions, giveaways, events, products or services that may be of interest to you. This may include Blueways disclosing your personal information to related companies of Blueways or other entities with which Blueways has a commercial relationship or arrangement for the purpose of the other entity contacting you for such direct marketing purposes. If you do not wish to receive such communications, you can opt-out by contacting Blueways via the contact details set out in this privacy policy or through the opt-out mechanism contained in a marketing communication to you.

#### **5. Disclosure of personal information**

Blueways discloses your personal information for the purpose for which Blueways collects it. As a result, generally, Blueways will only disclose your personal information for a purpose set out in paragraph 4 of this Privacy Policy. This may include disclosing your personal information to:

- (a) related companies of Blueways;
- (b) Wolfdene, as a provider of services to us and/or commercial partner of us in relation to the property developments we undertake;
- (c) our service providers, financiers, agents, contractors and other third parties that provide services to us, including our technology service providers and administration service providers;
- (d) people or entities considering acquiring an interest in Blueways or any business or assets of Blueways;
- (e) other parties who invest in or acquire an interest in Blueways or any business or assets of Blueways;
- (f) Blueways' professional advisors (including legal and accounting firms, auditors, consultants, insurers and other professional advisers); and
- (g) Government authorities where required by law.

Blueways may also disclose your personal information for other purposes if we notify you of the disclosure at or about the time of collecting the information, we have otherwise received your consent or the disclosure is required or authorised by law.

If you post information or other content to public sections of our website or to our social media sites, you acknowledge that the information or content may be viewed by the public and/or users of the relevant website or social media site.

## **6. Overseas disclosures**

Some of the parties that Blueways discloses your personal information to may be located outside Australia. We take reasonable steps to ensure that any such overseas recipients do not hold, use or disclose your personal information in a way that is inconsistent with the obligations imposed under the Privacy Act and the Australian Privacy Principles in the Privacy Act.

## **7. Links to other websites**

When you access our website or other online services, we may provide as a convenience to you links to other websites, including sites operated by our partners, associates, or independent third parties. These links are provided as a convenience to you. Each website has its own privacy practices, as described in that site's privacy policy. Those practices may be different than the practices described in this privacy policy, and we encourage you to read each website's privacy policy carefully before you use or submit information to that site. Additionally, to the extent that you follow a link to a website operated by an independent third party, please be aware that we exercise no authority or control over that third party, and cannot and are not responsible for any information that you may submit to that site.

## **8. Cookies**

Blueways may collect statistical information when you access and use our websites and any online platforms available via our websites, by utilising features and technologies of your internet browser, including cookies and pixel tags. We use this information to analyse how our websites and other online services are being used and seek to improve our websites and other online services and provide more user friendly and customised websites and online services. These features and technologies do not specifically identify you unless you expressly provide to us personally identifiable information. You may also elect to turn off the internet browser features which allow us to collect statistical information by selecting certain options on your browser. However, this may slow down or cause certain web pages to be inaccessible to you.

## **9. Security of personal information**

Blueways takes steps reasonable in the circumstances to ensure that the personal information it holds is protected from misuse, interference and loss and from unauthorised access, modification or disclosure. Your personal information will be kept on databases held on servers kept in a physically and technologically secured environment, accessed only by authorised personnel or contractors. Where personal information is held in hard copy, it will be held in controlled, access restricted premises which only authorised personnel or contractors will be permitted to access.

We have in place procedures for training our employees about their obligations under this privacy policy, disciplining them for failure to follow this privacy policy. We also have in place internal procedures to confirm general company compliance with this privacy policy.

Blueways will destroy or de-identify personal information in circumstances where it is no longer required, unless Blueways is otherwise required or authorised by law to retain the information.

## **10. Access and correction**

Blueways takes steps reasonable in the circumstances to ensure personal information it holds is accurate, up-to-date, complete, relevant and not misleading.

In addition, under the Privacy Act, you have a right to seek access to and correction of your personal information that is collected and held by Blueways. If at any time you would like to access or correct the

personal information that Blueways holds about you, or you would like more information on Blueways' approach to privacy, please contact the Blueways Privacy Officer using the details set out in paragraph 11 below. Blueways will grant access to the extent required or authorised by the Privacy Act or other law and take steps reasonable in the circumstances to correct personal information where necessary and appropriate.

To obtain access to your personal information:

- (a) you will have to provide proof of identity to ensure that personal information is provided only to the correct individuals and that the privacy of others is protected;
- (b) Blueways requests that you be reasonably specific about the information you require; and
- (c) Blueways may charge you a reasonable administration fee, which reflects and will not exceed the cost to Blueways for providing access in accordance with your request.

Blueways will endeavour to respond to your request to access or correct your personal information within 30 days from your request. If Blueways refuses your request to access or correct your personal information, Blueways will provide you with written reasons for the refusal and details of complaint mechanisms. If you are dissatisfied with Blueways' refusal to grant access to, or correct, your personal information, you may make a complaint to the Office of the Australian Information Commissioner.

## **11. Contacting Blueways**

For further information or enquiries regarding your personal information, or if you would like to opt-out of receiving any promotional or marketing communications or make a privacy complaint, please contact Blueways' Privacy Officer using any of the following contact details:

info@bluewaysgroup.com  
PO Box 103, Chadstone Centre, VIC 3148

## **12. Privacy complaints**

Please direct all privacy complaints to Blueways' Privacy Officer. At all times, privacy complaints will:

- (a) be treated seriously;
- (b) be dealt with promptly;
- (c) be dealt with in a confidential manner; and
- (d) will not affect your existing obligations or commercial arrangements between you and Blueways.

Blueways will acknowledge your complaint within 10 days of receipt and endeavour to resolve it within 30 days, unless Blueways informs you otherwise and seeks your agreement in writing.

Blueways' Privacy Officer will commence an investigation into your complaint. You will be informed of the outcome of your complaint following completion of the investigation. In the event that you are dissatisfied with the outcome of your complaint, or an extension to the time in which Blueways will resolve it, you may refer the complaint to the Office of the Australian Information Commissioner.