Privacy Policy

The DevCore Property Group Pty Limited which includes Coral Cove Communities Pty Ltd and Coral Cove Asset Management Pty Ltd (**DevCore**) complies with the Australian Privacy Principles contained in the *Privacy Act 1988* and the *Privacy Amendment (Enhancing Privacy Protection) Act 2012* to protect the personal information DevCore holds about individuals.

DevCore's policy is to only collect personal information which is reasonably necessary for its dealings with the relevant individual. DevCore only uses personal information for the purpose specified or which is reasonably apparent at the time the information was collected, or for a related purpose for which the individual would reasonably expect it to be used. DevCore takes reasonable steps to protect personal information that it holds from unauthorised access, modification, misuse, interference and loss. DevCore may sometimes disclose personal information overseas to allow external parties to perform their services for DevCore but DevCore will only do so in accordance with the Australian Privacy Principles.

Personal information is defined as information or an opinion that can identify or can reasonably identify an individual. This may include an individual's name, address, email address and telephone numbers. The type of personal information that DevCore collects will depend upon what dealings the relevant individual may have with DevCore.

DevCore may collect and hold personal information about individuals who:

- purchase, or express an interest to purchase, a block of land or house and land package;
- register or subscribe for electronic newsletters, or promotions run by DevCore;
- supply goods and services (for example, when establishing records and systems to enable payment for goods).
- use DevCore's websites, social media and other online services; or
- may otherwise come into contact with DevCore.

DevCore only collects personal information which is reasonably necessary for its dealings with the relevant individual. The types of personal information may include, but are not limited to:

- information that identifies the individual (for example, name, gender, address, contact details, date of birth, photographic or video images);
- information needed verify an individual's identity such as driver licence number;
- information including an individual's image collected via our CCTV systems;

- information about the individual that is required or authorised by law; or
- the individual's opinion/preferences about DevCore's products, services or staff.

The Privacy Act imposes restrictions on collecting sensitive personal information such as information about religious views, ethnicity, political opinions and personal health. DevCore generally does not collect sensitive personal information about an individual. However, in certain circumstances, DevCore may collect some sensitive information if it is necessary to allow DevCore to deal with the individual and provided the individual has given consent for DevCore to do so.

Whenever it is reasonable and practical to do so, DevCore collects personal information directly from the individual. However, in some circumstances, personal information may be provided to DevCore by other parties such as the individual's agent, employees or DevCore's authorised agents, service providers and subcontractors. DevCore will take reasonable steps to inform the individual that it has collected the individual's personal information, unless it is obvious from the circumstances.

DevCore operates a number of businesses which handle personal information. DevCore's policy is only to use personal information for the purpose which was either specified or reasonably apparent at the time when the information was collected. DevCore may also use or disclose the information collected for any other related purpose for which the individual would reasonably expect it to be used.

If DevCore wishes to use or disclose the personal information in other circumstances, it needs to obtain the individual's consent to do so.

In general, DevCore uses personal information for the following purposes:

- providing products or services that have been requested;
- communicating with the individual;
- helping DevCore manage and enhance its products and services, including analysing customer feedback and future customer needs;
- providing ongoing information and marketing about products and services to individuals that DevCore believes may be interested and where the individual has signed up; or
- complying with regulatory and legal obligations.

DevCore may send marketing materials to its customers or potential customers where DevCore has collected the personal information from the individual and the individual would reasonably expect DevCore to use the information for that purpose.

The individual's prior consent will be obtained before personal information is used for marketing purposes in situations where the personal information has been collected

from the individual and the individual would not reasonably expect DevCore to use the information for that purpose, the personal information has not been collected directly from the individual or where sensitive information is involved.

If the customer no longer wishes DevCore to use his or her personal information in order for DevCore to provide marketing materials, the customer is to advise DevCore via the relevant method provided for in the electronic marketing message sent to the customer (e.g. via an 'unsubscribe' link) or to write to DevCore (refer to contact details below). DevCore will act and amend its records promptly.

DevCore may disclose personal information to other entities within DevCore.

External parties may be given access to personal information held by DevCore in certain circumstances. These include, but are not limited to:

- DevCore's contractors, consultants, advisers and service providers who assist DevCore in the operation of its business or to provide a customer service (for example, a company which helps maintain DevCore's computer systems or sends out DevCore's electronic direct mail);
- joint venture partners for the purposes of seeking relevant regulatory approvals;
- third party lenders and insurers;
- anyone authorised by a provider of personal information; and
- relevant parties in situations when DevCore is required by law to provide the information.

DevCore limits the information disclosed to external parties to what is required for them to perform their services for DevCore or the relevant individual, or what is required by law. From time to time, DevCore may disclose personal information to external parties located outside Australia to allow the external parties to perform their services for DevCore. DevCore will only disclose personal information overseas when it is necessary for the services provided by these external parties and when it is in accordance with the Australian Privacy Principles. This includes taking reasonable steps to ensure that the external party has appropriate data handling arrangements in place.

DevCore does not sell personal information to entities outside DevCore.

DevCore will take reasonable steps to protect personal information that it holds from unauthorised access, modification, misuse, interference and loss. DevCore maintains physical security measures over its physical premises, and a range of computer and network security measures (such as systems access, firewalls) over its electronic systems. DevCore employees are required to maintain the confidentiality of any personal information held.

If other parties provide support services, DevCore generally requires them to agree to appropriately protect the privacy of the information provided to them.

Any individual can request access to the personal information DevCore may hold about them. To obtain access to the information, the individual needs to write to DevCore noting their request. DevCore will require evidence to verify the identity of the individual.

In normal circumstances, DevCore will provide the individual with access to the individual's personal information. However, in some circumstances, there may be legal, regulatory or administrative reasons to deny the requested access. If access is denied, DevCore will provide the individual with the reasons for doing so.

If an individual wishes to change personal information that the individual believes may be inaccurate, out-of-date, incomplete, irrelevant or misleading, the individual may write to DevCore requesting the information to be changed.

DevCore may also collect the following information from you:

- A cookie is a small data file that may be placed on the computer of a web user (usually in the browser software folder) during a visit to a DevCore website. Cookies are necessary to allow the DevCore website and the user's computer to interact effectively and enhance security. Cookies can record information about the user's visit to assist DevCore in better understanding the needs of the user. For example, user traffic data may be collected and used to infer the website user's demographic using various web analytic technologies. DevCore sometimes also use performance tracking technology (such as conversion tags) to help DevCore to track user behaviour on its websites. General such user traffic and performance tracking data is non-personally identifiable and is collected on an aggregate level to report statistics to assist DevCore to improve the quality and relevancy of its services. However, if the user has completed the online registration form on DevCore's websites, such cookie data may be linked to the personal information DevCore holds about the user. In these circumstances, this cookie data will be treated the same manner as the personal information which it has been linked.
- DevCore may also use cookies from third party ad servers for the purpose of targeting our online advertisements on other sites. The cookies provided by the third party ad servers will collect information such as the device the user used to access the DevCore website (such as the type of device, the browser type or the operating system), the user's browsing behaviour (such as what the user searched for, the pages the user viewed, the date and time of the visit and how long the user stayed) and the performance of our marketing campaigns (such as which ads or online content the user viewed or accessed). The information collected through this technology is not personally identifiable but such

information will be shared with the third party ad servers for the purposes of showing the user more relevant advertising on DevCore's websites or partner sites.

- If DevCore website users do not wish to receive any cookies, they should set their browser to refuse cookies but this means that they may not be able to use certain parts of the DevCore website. If the user does not want third party ad servers to use cookies for targeted advertising purposes, the user can use an opt out mechanism provided by various advertising industry bodies such as Network Advertising Initiative opt-out (http://www.networkadvertising.org/choices/DAA).
- DevCore's websites use, among other technologies, Google's suite of analytics programs to track website traffic. Where users have chosen to enable Google to associate their web and app browsing history with their Google account, and to use information from their Google account to personalise ads, Google will use data from its signed-in users together with DevCore's Google Analytics data to build audience lists for cross-device remarketing. For users of DevCore's websites, Google Analytics will collect Google-authenticated identifiers associated with the user's Google Accounts (and therefore, personal information). Google Analytics will also temporarily join these identifiers to DevCore's Google Analytics data. If a customer does not wish to have their Google-authenticated identifies joined with DevCore's Google Analytics data, they should opt out of the 'personalised ads' option via their Google account.

DevCore reserves the right to change this Policy at any time. DevCore will notify any changes to this Policy by posting an updated version of the Policy on the DevCore website at https://www.devcore.com.au.

An individual can make a complaint about the way in which DevCore has handled an individual's personal information by writing to DevCore's General Counsel. DevCore will endeavour to act promptly in response to a complaint.

You may also contact the Office of the Australian Information Commissioner as follows:

Phone: 1300 363 992

Web: www.oaic.gov.au
Address: GPO Box 5218 Sydney, NSW 2001

DevCore's General Counsel can be contacted as follows:

Email: neala@devcore.com.au
Address: General Counsel

DevCore Property Group

Suite 16.02/99 Mount Street

North Sydney NSW 2060

For further information about privacy issues and the protection of privacy, visit the Office of the Australian Information Commissioner's website at http://www.oaic.gov.au.