



## **PRIVACY POLICY**

### **1. GENERAL**

Fiducia Group Pty Limited A.C.N 600 324 383, FPG Northbridge Pty Limited A.C.N 606 154 107 and Boutique Estates Pty Limited A.C.N. 166 989 064 (referred to as “The Group”, “we”, “us”, “our”), respects your privacy and is committed to handling your personal information in accordance with the National Privacy Principles (“NPP”) and the Privacy Act 1988 (Cth) (the “Act”).

This privacy policy explains how we manage your personal information we collect about you. Please read this privacy policy before using the site or submitting any personal information. By using the site [www.41drummoyne.com.au](http://www.41drummoyne.com.au) (the “Site”), you are accepting the practices described in this privacy policy.

These practices may be changed, but any changes will be posted on the Site and changes will only apply to activities and information on a going forward, not retroactive, basis. You are encouraged to review the privacy policy whenever you visit the Site to make sure that you understand how any personal information you provide will be used.

Note: the privacy practices set forth in this privacy policy are for the Site only. If you link to other websites, please review the privacy policies posted at those websites. This privacy policy does not apply to employee records.

### **2. PURPOSE OF THE PRIVACY POLICY**

THE GROUP takes its obligations under the Act and the NPP seriously. THE GROUP will take all reasonable steps to comply with the Act and the NPP to safeguard and protect the privacy of the information that we hold. This privacy policy sets out how we intend to do so.

### **3. WHAT PERSONAL INFORMATION DOES THE GROUP COLLECT AND HOW DOES IT COLLECT IT?**

We collect your personal information:

- (a) directly from you;
- (b) when you deal with us by telephone, letter or email;
- (c) when you access and interact with the Site; or
- (d) from other sources.

The type of information that THE GROUP collects and holds includes personal information about:

- (a) individuals who use our services;
- (b) your activities on the Site; and
- (c) other people who come into contact with THE GROUP.



The information we collect may include information such as your name, mailing address, email address, telephone and/or facsimile number, date of birth, postal address, credit card details, and other transaction or registration details. We may also collect data that can, under certain circumstances, indirectly lead to personal identifiable information. Users who register to become members of the Site may choose to provide or store non-personal information or related data in their profiles. You are aware, consent to and authorise other members of the Site and third party advertisers to view your profile information as well as any information you post on the Site as a member.

THE GROUP will generally collect this information by way of your voluntary registration over the internet, by phone, facsimile and email and in the course of interviews. Otherwise, THE GROUP will not collect or monitor any personal information about you without your consent.

When you visit the Site, we may record, for statistical purposes or in order to improve the Site or services provided by THE GROUP, the following information:

- (a) the date and time of your visit;
- (b) web pages you have accessed;
- (c) documents you have downloaded;
- (d) your IP address; and
- (e) the type of operating system and internet browser you use.

Where it is lawful or practicable to do so, we will provide you with the option of remaining anonymous when dealing with THE GROUP.

#### **4. HOW MIGHT THE GROUP USE THE PERSONAL INFORMATION?**

Your personal information is confidential.

Generally, THE GROUP may use the personal information for the following purposes:

- (a) to provide services and support to our customers;
- (b) to respond to requests, inquiries or applications;
- (c) to evaluate, develop and enhance our websites and our services;
- (d) to resolve disputes and troubleshoot problems;
- (e) to enforce the policies of our Site;
- (f) to conduct website and system administration, such as for the technical support of our websites and computer systems;
- (g) to provide information to individuals services that we think may be of interest to them; and
- (h) to communicate special offers, promotions or market research surveys.

Otherwise THE GROUP will not use any personal information about you without your consent.



## 5. HOW MIGHT THE GROUP DISCLOSE THE INFORMATION?

You authorise and consent to THE GROUP disclosing your personal information to:

- (a) enforce the policies of THE GROUP;
- (b) respond to any claims that content which you submitted violates the rights of any other person;
- (c) protect the rights of any person;
- (d) service providers such as organisations who provide data processing, printing and fulfilment operations;
- (e) entities for whom we are acting as an agent or publisher, such as societies and our affiliated group companies;
- (f) any court, tribunal or regulatory authority as required by law, including in response to subpoenas, court orders, or legal process, or to establish or exercise our rights to defend against legal claims;
- (g) any individual or authority if we believe it is necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, safety of person or property, violation of our policies, or as otherwise required by law;
- (h) anyone authorised by the individual;
- (i) to another company, in the event that THE GROUP, the Site or a related asset or line of business is acquired by or transferred to that other company;
- (j) any individual or authority to protect the rights, property or personal safety of any member of the public or THE GROUP.
- (k) our related bodies corporate;
- (l) our employees, insurer, third party contractors, agents or to our sponsors on a confidential basis;
- (m) our business partners, where from time to time, we partner with other companies to provide co-sponsored or co-branded products or services and may share your information with our co-sponsor;
- (n) our service providers (including service providers that provide web maintenance, billing and booking services);
- (o) any other person or entity (the "Recipient") upon the basis that the Recipient may only collect, use or disclose the information for the purpose for which that information was originally collected by THE GROUP

We will otherwise not transfer your personal information, or use, sell or disclose your personal information without your consent, unless:

- (a) such disclosure is permitted under the Act;
- (b) we are required by law to disclose that information;
- (c) we are trying to protect against or prevent actual or potential fraud or unauthorised transactions; or
- (d) we are investigating fraud which we believe may have already taken place.



The Site may contain links to websites which are owned or operated by third parties. You should make your own enquiries as to the privacy policies of these third parties. We are not responsible for information on, or the privacy practices of, such websites.

You consent to and authorise THE GROUP to transfer your personal information to an organisation or individual outside Australia. THE GROUP will only transfer personal information to a foreign country for the purpose of providing you with the services of THE GROUP and for carrying out any request you make when you use and interact with the Site.

Your personal information may be transferred overseas if you are accessing the Site from a country outside of Australia.

If THE GROUP sells all or part of its business or makes a sale or transfer of all or part of its assets or is otherwise involved in a merger or transfer of all or part of its business, THE GROUP may transfer your personal information to the party or parties involved in the transaction as part of that transaction.

THE GROUP will not otherwise disclose any personal information about you without your consent.

## **6. MANAGEMENT AND SECURITY OF PERSONAL INFORMATION**

THE GROUP takes reasonable steps to keep your personal information secure. Personal information about individuals is stored on servers that sit behind a firewall and is physically housed within a secure data centre. Employee access to personal information is limited.

We cannot and do not guarantee that your personal information will be protected against unauthorised access or misuse or abuse. We do not accept any liability for the improper actions of unauthorised third parties.

In relation to the internet, while THE GROUP uses reasonable efforts to safeguard the privacy of your personal information, transmissions made by means of the internet cannot be made absolutely secure. THE GROUP assumes no responsibility for disclosure of data due to errors in transmission or by unauthorised third parties. THE GROUP also assumes no responsibility or liability for third parties such as advertisers or other entities who utilise banner ads and links from the Site. If you click through a banner ad or link and submit your information to an advertiser, you will be subject to the privacy policies of those third party websites.

We retain the personal information we collect from you for as long as the information is relevant to our business purposes or the purpose of collection or until you request that we remove the data by contacting our Privacy Officer at the details set out below.



## **7. PERSONAL INFORMATION ABOUT OTHER PEOPLE**

You must not provide personal information to THE GROUP about another person, unless that person has authorised THE GROUP, through you, to collect, use and disclose personal information about that person for the purposes described in this privacy policy.

The Site may allow users to share their personal information for the purpose of completing transactions. You agree to only use another user's personal information for the purpose of completing a transaction. THE GROUP encourages you to respect the privacy of other users. To best maintain the privacy of your personal information, THE GROUP will only provide limited information with respect to another user for the purpose of completing a transaction.

## **8. WHAT HAPPENS IF YOU CHOOSE NOT TO PROVIDE THE INFORMATION?**

You are not obligated to give us your personal information. However, if you choose not to provide us with your personal information we may not be able to provide you with information about the services offered by THE GROUP or to fulfil one or more other purposes of collection of your personal information.

## **9. SOURCES OF INFORMATION**

Where possible THE GROUP will collect your personal information directly from you. If your personal information is collected from a third party, THE GROUP will take reasonable steps to inform you of the collection and provide you with our privacy policy.

## **10. USE OF COOKIES**

The Site collects information through the use of "cookies". Cookies are anonymous, unique alphanumeric identifiers sent to your browser from a website and stored on your computer's hard drive. The information we collect via cookies does not personally identify you, although it does identify your browser. We use this information to provide you with customised information when you visit the Site, and to collect aggregated user data for the purposes of usage analysis, quality control and administering and improving the Site. Aggregated data (which cannot be used to identify you) may be shared with third parties.

In addition, we may use third party advertisers to place advertisements on the Site. These third party advertisers may use cookies and other technologies to, among other things, enable such third party advertisers to record which advertisements your browser has seen and which site pages you have been viewing when the advertisement was delivered. You should make your own enquiries as to the privacy policies of these third parties. We are not responsible for information on, or the privacy practices of, such third parties.



You can prevent your browser from accepting new cookies, be notified when you receive a new cookie, or disable cookies altogether by changing your browser's preferences menu. If you disable cookies, you may not be able to use the customised functions on the Site.

#### **11. UPDATING YOUR PERSONAL INFORMATION**

THE GROUP endeavours to ensure, but in no way guarantees, that the personal information it holds about you is accurate, complete and up-to-date. You will generally be able to update the information we hold about you by accessing your account and profile information on the Site. You should promptly update your personal information if it changes or becomes inaccurate.

You can help keep your personal information up to date and secure by contacting our Privacy Officer (contact details set out below) and by maintaining confidentiality of any password, user name, accounts and profiles used on the Site. In the event that you share your password or other personal information with others, you will be responsible for all actions taken on your account.

#### **12. SENSITIVE INFORMATION**

The term "sensitive information" refers to personal information about an individual's racial or ethnic origin, political or philosophical beliefs or affiliations, trade or professional affiliations, sexual preferences or practices or criminal record and health information. We do not collect sensitive information unless it is volunteered by you.

#### **13. ACCESSING PERSONAL INFORMATION**

You will generally be able to view the personal information we hold about you by accessing your account or profile information on the Site. THE GROUP will, on request, provide you with access to personal information held by THE GROUP about you, subject to any limitations or exceptions in the Act. THE GROUP will deal with requests for access within a reasonable time. You must pay THE GROUP for reasonable costs incurred by THE GROUP in providing you with access.

If THE GROUP refuses to provide you with access to personal information about you, THE GROUP will provide you with reasons for the refusal, in accordance with the requirements of the Act.



#### **14. SECURITY OF YOUR PERSONAL INFORMATION**

We will take all reasonable steps to protect the security of the personal information that we hold. This includes taking appropriate measures to protect electronic materials and materials stored and generated in hard copy. We also take reasonable steps to destroy or permanently de-identify your personal information where it is no longer required and to protect your personal information from unauthorised access, disclosure, loss, misuse and alteration.

#### **15. MORE INFORMATION AND UPDATES TO THIS PRIVACY POLICY**

THE GROUP reserves the right to modify this privacy policy at any time without prior notice to you. The latest privacy policy will apply at all times. To view the current version of our privacy policy, visit our website [www.manning.com.au](http://www.manning.com.au) or contact our Privacy Officer at the details set out below.

#### **16. CONTACTING OUR PRIVACY OFFICER**

If you have any questions, complaints or comments about our handling of your personal information under this privacy policy or otherwise, please contact our Privacy Officer at: Email: [info@fiducia.com.au](mailto:info@fiducia.com.au)

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