



**Last Updated and Effective: July 1, 2021**

## **AUSTRALIAN PRIVACY POLICY**

### **Who we are;**

**Dye & Durham Australia Pty Ltd** ACN 646 898 160 aims to protect the privacy and security of your information within the scope of the Australian Privacy Principles established by the Australian Privacy Act 1988 (Cth). For the purposes of this Privacy Policy, any reference to Dye & Durham shall include any of the present and future affiliates of Dye & Durham Australia Pty Ltd including affiliates located in and outside of Australia. As such, when we mention "Dye & Durham", we", "us" or "our" in this Privacy Policy, we are referring to the relevant company within the affiliated group responsible for processing your personal information.

This Privacy Policy sets out how we treat the personal information that we collect, use, and disclose. When we refer to 'personal information', we mean that term as defined in the Australian Privacy Act 1988 (Cth). In that legislation, personal information is defined as 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).

We may update this Privacy Policy from time to time. The most current version and its effective date (as set out above) will be located on our website [dyedurham.com.au](http://dyedurham.com.au) (our "website") and is also available by contacting our Privacy Officer by email or at the address detailed below.

By using our website, or by providing any personal information to us, you consent to the collection, use and disclosure of your personal information as set out in this Privacy Policy. If you do not consent, then you should discontinue use of our website.

### **Types of personal information collected.**

The types of personal information that we collect, and hold will vary depending on your dealings with us. This personal information is likely to include any or all the following:

- name(s), address(es), telephone number(s), electronic address(es) and other contact details;
- payment information (such as credit card or bank details);
- transaction details relating to your use of our products, services, or benefits, including tax file numbers, student identification details and information about how you finance property;
- information about your use of our information and communications system including, location, preferences, current and previous education and employment information.

All of which are required to provide our services.



Where specifically required under certain circumstances we may collect your personal information which falls into the category of being 'sensitive information' such as:

- health information
- information about your criminal record, racial or ethnic origin, or religion; and
- information related to health and safety, workplace investigations or workplace environment, where you agree to provide it to us or authorise us to obtain it from a third party. We collect and use your sensitive information as permitted by you or otherwise in accordance with the Privacy Act 1988 (Cth).

From time to time, you may provide to us, and we may collect from you, personal information about third party individuals. Where you provide the personal information of any third-party individual, it is your responsibility to ensure that those persons are aware of this Privacy Policy, understand it and agree to accept it and that you have their permission to provide their personal information to us.

You do not have to provide us with any personal information, however if you do not do so we may not be able to provide you with the products, services or benefits you have requested.

### **How we collect personal information**

Generally, we collect personal information directly from you, such as:

- when you submit information through our website;
- in person;
- in the course of us providing you with a requested product, service or benefit; or
- when you have other dealings with us.
- when you apply for a position to work with us.
- when you make an enquiry about a product or service we offer.

We also collect personal information through:

- our related bodies corporate when you request information about or use our products and services.
- our business partners (such as government registries) using publicly available sources; and
- third party service providers (such as marketing and communication companies) when you subscribe to receive marketing communications from us.

We may also collect personal information from third party organisations, including market research organisations, at external events when you provide your business card or contact details.

### **Why we collect, use and disclose personal information**

We will use the personal information we collect for the purposes disclosed at the time of collection and as set out in this Privacy Policy. We will not use your personal information for any other purpose without first seeking your consent unless otherwise authorised or required by applicable law.



We will collect personal information for the following purposes:

- to establish or maintain your relationship with us;
- to provide and improve the products or services you have requested from us;
- to administer and protect our business or this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data);
- to answer any inquiry you make; and
- to send updates, notifications, reminders and relevant documentation.

We may also disclose your personal information to third parties who work with us in our business as we consider reasonably necessary to provide, promote or improve the products or services you have requested or may be interested in, such as:

- our related bodies corporate;
- our affiliated organisations in the countries set out below;
- third party service providers (including professional advisers, insurers and auditors) so that they can provide their services including business administration, website administration, payment processing, data hosting, data analysis, market research, marketing support, customer profiling, lead generation, customer service or other consultancy services or advice;
- government authorities, national regulators and accreditation bodies;
- marketing consultants, promotion companies and website hosts;
- consultants and professional advisers; and
- third parties who may acquire us or to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may have or may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal information in the same way as set out in this Privacy Policy.

We may from time to time disclose your personal information to comply with a legal requirement such as law, regulation, court order, subpoena, warrant in the course of a legal proceeding or in response to a law enforcement agency request.

We may also combine your personal information with information available from other sources, including the external sources described above and sources within our divisions and businesses, to help us provide better products and services.

### **Direct marketing**

We will also use and disclose your personal information to send direct marketing to you from:

- us;
- our related bodies corporate; and
- third parties who provide services to us.

The direct marketing may relate to:

- our products and services;
- the products and services of other parties; or
- new developments we believe may be of interest to you.

You may opt-out of receiving this direct marketing through the unsubscribe function that will be made available to you with each direct marketing communication, or by contacting our Privacy Officer using the details set out below.



### **How we store and protect personal information**

We store personal information in a combination of computer storage facilities, paper-based files and other records. In so doing, we take steps aimed to protect your personal information from misuse, interference and loss, and unauthorised access, modification or disclosure.

Where we provide personal information to third parties, we aim to use contractual measures to protect this information.

Additionally, we take steps aimed to destroy or permanently de-identify personal information when we no longer need it.

The internet is not a guaranteed secure method of transmitting information. Accordingly, we cannot and do not accept responsibility for the security of the methods you use to transfer information when you send it to us or where you receive it from us over the internet, or for any unauthorised access or use of that personal information by others.

### **Do we send personal information overseas?**

Depending on your relationship with us or the type of service we provide to you we may disclose, process or transfer your personal information, for the purposes described above, to our offices and other organisations outside Australia, including but not limited to Canada, the United Kingdom, Ireland, France, Germany and the United States, China, Korea, India, Indonesia, Japan, Malaysia, Singapore, Thailand, the Netherlands, other European Union countries and Mexico. We may also access from or transfer to, process in or disclose your personal information to other countries, including where specified by you, from time to time in order to provide services to you or exercise our rights or perform our obligations.

Privacy laws vary from country to country. We require our third-party service providers to comply with the applicable privacy laws within the country within which they operate. We will aim to ensure that any such service providers contractually commit to appropriately safeguarding your information in accordance with Australian data privacy legislation, and we take steps from time to time to verify their compliance with such contractual commitments.

By providing your personal information to us, you consent to our disclosure of your personal information to organisations in those countries (where relevant or necessary). You may request us not to transfer your personal information to the countries listed above, but if you do so we may not be able to provide the services or products you have requested from us.

### **How you can access or correct your personal information**

We take steps aimed to ensure the personal information we collect, use or disclose is accurate, complete and up to date. If your personal details change, or if you become aware of changes to the personal details of a third party whose personal details you have provided to us, such as an address or phone number, please contact our Privacy Officer by email or at the address detailed below.

At your request, we will correct personal information that we hold about you or provide you with a copy of any personal information which we hold about you, unless an exception under the Privacy Act 1988 (Cth) applies. We may charge a fee for retrieving this information if your request is clearly unfounded, repetitive or excessive, in which case we will inform you of the fee and obtain your agreement to that fee before providing the information or alternatively, we may refuse to comply with your request in such circumstances.



We will promptly acknowledge and investigate any complaint about the way we manage personal information.

We may need to request specific information from you to help us confirm your identity and ensure your right to access or correct your personal information. This is a security measure to ensure that personal information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request.

We will try to respond to all legitimate written requests by you regarding your personal information within 30 days after receiving them. Occasionally it may take us longer if your request is particularly complex or you have made several requests. In this case, we will let you know and keep you updated.

### **Cookies**

Our website uses cookies to track user traffic patterns and to better serve you when you revisit a website. A cookie is a small data file that a website may write to your hard drive when you visit it. A cookie file can contain information, such as a user ID which the website uses to track the pages you have visited. You can refuse all cookies by turning them off in your browser. However, full functionality for our websites requires the use of some cookies.

Information is also generated whenever a page is accessed on our website that records information such as the time, date and specific page. We collect such information for statistical and maintenance purposes that enables us to continually evaluate our website performance.

### **Third-Party Web Tracking**

We use third-party web tracking from Yahoo!, Google and other providers of similar tracking services to help analyse where visitors go and what they do while visiting our website. These providers use browser cookies to collect anonymous traffic data. They may also use anonymous information about your visits to this and other websites to improve their products and services and provide advertisements about goods and services of interest to you. If you would like more information about this practice and to know your options for not having this information used by these providers, see the policies provided by Yahoo and Google.

### **How to contact us or make a complaint**

If you have any questions about this Privacy Policy, if you wish to update information, we hold about you or if you wish to make a complaint about our collection, use or disclosure of your personal information under this Privacy Policy, please contact:

The Data Protection Officer  
Dye & Durham Australia Property Limited  
680 George Street  
Sydney  
Australia  
Ph: +61 (02) 8206 6000  
Fax: +61 (02) 8206 6001  
[DataProtection.AU@DyeDurham.com](mailto:DataProtection.AU@DyeDurham.com)

You have the right to make a complaint at any time to the Office of the Australian Information Commissioner (**OAIC**) at <https://www.oaic.gov.au>. However, we would appreciate the chance to deal with any concerns first and ask that you contact us to give us a chance to address your concerns or queries.