

SPRINGLAKE PRIVACY POLICY

Introduction

Martin Road Development Pty Ltd ACN 152 398 779 (**Springlake**), the developer of Springlake Mount Barker, is a leading developer of residential land in South Australia.

The privacy of personal information you provide to us (**your personal information**) is important and Springlake respects and protects the privacy of our users. The following privacy policy governs the collection and use of your personal information by Springlake and sets out how we intend to respect your rights to privacy in accordance with the Australian Privacy Principles contained in the *Privacy Act 1988 (Cth)* (**the Act**).

Personal Information

The term '**personal information**' has the meaning given in section 6 of the Act and includes, but is not limited to, information about, or an opinion that identifies, an individual.

What personal information do we collect?

We limit our collection of personal information to a business, organisation or individual's name, a mailing or street address, telephone number, email address, facsimile number, occupation and gender and any other information relating to you that you provide directly or indirectly to us.

Where relevant we may record your relationship with any of our existing contacts and business associates which could be of benefit to you.

How we collect personal information

We collect personal information from you in ways including:

- when you meet with us (for example, where you give us a business card or complete a Registration form);
- when you communicate with us by letter, telephone, email or fax;
- from third parties such as your representatives (lawyers, accountants, finance/mortgage brokers and financial Advisers) and your employer;
- from publicly available records;
- when you register for or attend our events; and
- when you submit or provide information through our website, blogs or other social media outlets or our representatives or agents.

We may ask other people to analyse traffic on our websites, blogs and other social media outlets and they may use cookies to do so. A cookie is a piece of data stored on your hard drive containing information about you. Usage of a cookie is in no way linked to any personally identifiable information while on our site. Once you close your browser, the cookie simply terminates. If you reject the cookie, you may still use our site, however please note that if you do this you may not be able to use the full functionality of this website.

When we request your personal information, we will endeavour to specify which information we require for our purposes and which information may be provided at your election. You may elect not to supply any information requested by us, but our ability to provide services to you may be restricted.

If you give us personal information about another person, you represent that you are authorised to do so and agree that you have obtained consent from that person for us to use and disclose their personal information and that they may access any personal information we hold about them.

Why do we collect personal information?

We collect personal information:

- to advise and provide information about our products and services to you, including to assist you in buying land and to suggest land that may be of interest to you;
- to enable us to assess your suitability and eligibility for buying land;
- to complete a transaction to which the provision of that personal information relates (for example, in the completion of sales documentation);
- for our marketing, planning, product development and research requirements;
- to communicate and manage our relationship with you, including to get feedback and to answer any enquiries you may have about our products and services;
- to provide you with access to the protected areas of our website;
- for our administrative purposes, including updating our records to keep your details up to date;
- to manage our employees, contractors, agents and advisers; and
- to generally carry on our business.

How we use your personal information

We use your personal information for the primary purpose for which it was collected, related purposes and other purposes authorised by the Act.

At any time you may opt out of receiving any communications from us (other than as required for the operation of our business). If you wish to opt out of receiving communications from us please contact our Privacy Officer whose contact details are set out later in this policy.

Anonymity and pseudonyms

Individuals have the right not to identify themselves, or to use a pseudonym when dealing with us. However, if we request personal information and it is not provided, we may not be able to provide services to or otherwise assist the relevant individual.

Accessing your personal information

You may request access to personal information we hold about you. We may require you to verify your identity and to specify what information you require. We will deal with all requests for access to personal information as required by the Act.

Disclosure of your personal information to others

We will only disclose your personal information for the purposes that we collected the personal information.

We may disclose your personal information to:

- our related entities and subsidiaries;
 - our employees, contractors, agents and advisers, including appointed sales agents that we use in the ordinary operation of our business;
 - builders advertising house packages with us;
 - credit reporting and debt collection agencies; and
 - other persons in connection with the provision of our products and services, including to any of your contractors and other advisers and agents;
- and anyone else whom you authorise or consent to us to disclose the information or as otherwise authorised by the Act.

By providing personal information to us you also consent to your information being stored and processed on a data server or data servers (e.g. cloud services) owned by a third party, including any third party that may be located outside of Australia. We will take reasonable steps to ensure that any third party providers comply with the Australian Privacy Principles under the Act. If personal information is only routed through servers located outside of Australia - this is not regarded as a disclosure.

Disclosure to overseas recipients

We do not disclose personal information to overseas contractors such as IT service providers. Where it may be necessary to disclose personal information about you to overseas contractors consent to such disclosure must be provided by you.

Who else can access this information?

Our employees, contractors, agents and advisers may have access to some personal information we collect.

Our auditors, insurers and legal and other professional advisers may also access our records to protect our interests and to ensure that we comply with our obligations.

How we keep personal information secure

We take reasonable steps to protect your personal information from misuse, loss, unauthorised access, modification or exposure. We store information in access-controlled premises, and electronic information on secure servers. We require all persons authorised to access electronic information to use logins and passwords to access such information.

We require all our employees, contractors, agents and advisers and others to whom we disclose personal information or whom may have access to personal information we collect from you, to keep such personal information private and to protect such personal information from misuse and loss and from unauthorised access, modification or exposure.

Unless we are prevented to do so by the law, we de-identify or destroy securely all personal information we hold when no longer reasonably required by us.

Website analytics

Our website may contain links to other websites. Please be aware that we are not responsible for the privacy practices of such other sites. When you go to other websites from here, we advise you to be aware and read their privacy policy.

Integrity of personal information

We take reasonable steps to ensure that the personal information we collect is accurate, up to date and complete and that the personal information we use or disclose is, having regard to the purpose of such use or disclosure, accurate, up to date, complete and relevant.

Correction of personal information

You may request corrections to personal information we hold about you. We deal with all requests for correction to personal information as required by the Act.

Changes to this privacy policy

We reserve the right to make changes to this privacy policy from time to time. We recommend that you regularly review our privacy policy to ensure you are aware of any changes.

Complaints

If you wish to make a complaint about this Privacy Policy or our collection, use or disclosure of personal information, please contact us in the first instance. We will investigate your complaint and try to promptly resolve your complaint directly with you.

If you are not satisfied with the outcome, then you may make a complaint to the Office of the Australian Information Commissioner (**OAIC**). For information about how to make such a complaint, please refer to the OAIC website <http://www.oaic.gov.au/>.

Contact us

To request access to or correction of personal information, or to make a privacy complaint to us, please contact:

Privacy Officer

Richard Osborne

2 Red Gum Crescent

Mount Barker SA 5251

Telephone: 0417 878 314

Email: admin@springlake.com.au

Springlake