

PRIVACY POLICY

1. PURPOSE

This policy outlines how Property Development Solutions (Aust) Pty Ltd (**PDS Group**) handles Personal Information in the course of doing business. It affirms our commitment to and explains how we will meet the Australian Privacy Principles (**APP**) that outline standards that must be met in regard to the collection, use, disclosure and storage of Personal Information. It also explains how individuals can access and correct their Personal Information.

2. SCOPE

This policy applies to all Personal Information as defined below and in the Act, noting this specifically excludes Employee Records as defined in the Act.

3. DEFINITIONS

The Act in this policy refers to the *Privacy Act 1998 (Clth)* and any subsequent amendments

APP refers to the Australian Privacy Principles as defined in the Act

Personal Information is as defined in the Act, specifically 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.'

4. POLICY

4.1 Collection

PDS Group collects Personal Information that is relevant to our business relationships including business development and conducting business activities. This includes the type of information typically on a business card or email signature, and may also include:

- Information about our interaction with individuals and other relevant details that assist in our business
- Personal Information provided directly through our website or internal IT systems, such as cookies and IP addresses
- Personal Information provided when applying for employment with PDS Group, including sensitive information regarding personal health.

We collect this Personal Information primarily from the individual concerned in hard or soft copy or verbally. Personal Information may also be collected from authorised third parties such as from recruitment agencies, industry or mutual contacts, our staff or employment referees.

In most cases, individuals are unable to interact with PDS Group anonymously, other than by disabling cookies on their computer when accessing our website.

4.2 Use

PDS Group collects Personal Information in order to perform our business activities and operations and provide the best possible quality of service. We may use it for:

- Providing services to clients, interacting with stakeholders and sending communications to do so
- Responding to queries, providing information or advice about existing or new services

- Assessing the performance of the PDS Group website to improve its operation
- Determining suitability for potential job vacancies
- Conducting regular business processes, such as invoice processing, sharing details with service providers and other third parties
- Administrative, marketing, planning, service development, quality control or research purposes
- Updating our records to keep Personal Information up to date
- Processing and responding to any complaints about Personal Information
- Complying with the law or cooperation with any government authority.

PDS Group will never sell or rent Personal Information to other third parties.

4.3 Disclosure

Personal Information collected by PDS Group may be disclosed to our employees, clients, contractors and consultants and other service providers, for the purpose of conducting our business and business development, or to perform the services or function they have been engaged by PDS Group to deliver. This may include, with permission, sharing Personal Information such as name and image on our corporate social media accounts.

PDS Group may send communications and information about our products and services that we consider may be of interest to our industry contacts and network, and to those individuals who have indicated their interest by joining our mailing list through the PDS Group website. Every communication provides recipients the opportunity to opt out of future communications at any time.

PDS Group will also disclose Personal Information where required by government agencies and as required by law.

4.4 Storage and Security

The Personal Information we collect, use and disclose may be stored in hard and/or soft copy, for example in project files, recruitment files and databases.

In electronic form, Personal Information may be stored on our servers and computers, on online databases and software, and may pass through online, cloud-based services for email, saving and/or file sharing. The PDS Group website is linked to the internet which is inherently insecure, and we cannot provide any assurance regarding the security of transmission of Personal Information communicated online. We also cannot guarantee that the information will not be intercepted whilst being transmitted over the internet. However, PDS Group takes reasonable steps to protect Personal Information from misuse and loss, unauthorised access, modification or disclosure, and from any other interference. To keep electronic information secure, we use a range of security measures, such as restricting access to users who have a valid username and password.

When the Personal Information is no longer required or current, it is appropriately and securely archived and/or destroyed, or de-identified.

5. PROCESS

5.1 Access to and correction of Personal Information

We endeavour to ensure Personal Information we hold is accurate, complete and up-to-date. PDS Group will update details if advised of an update or correction.

Individuals may request to access their Personal Information held by PDS Group at any time by contacting the Privacy Officer, who will generally grant access to this unless it would interfere with the privacy of others or if it would result in breach of confidentiality.

5.2 Contacting Us

Any questions, enquiries or complaints about this Privacy Policy should be directed to the Privacy Officer at PDS Group corporate offices, or via email to privacy@pdsgroup.com.au.

6. RESPONSIBILITIES

PDS Group Employees have responsibilities to:

- Observe the policy requirements about use and disclosure, raising any privacy queries or concerns with the Privacy Officer

The Privacy Officer is responsible for:

- Maintaining and publishing this policy,
- Providing guidance to Employees, People Managers and Directors and other interested parties in its application, and
- Investigate and respond to any complaints about privacy breaches.

7. SUPPORTING MATERIALS

The latest version of this document is published on the PDS Group website at www.pdsgroup.com.au/privacy – refer there, as printed copies may not be the most current. See also:

- Office of the Australian Information Commissioner website at <https://www.oaic.gov.au>

8. APPROVED/PUBLISHED

Andrew Fortey
Managing Director
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