

Vantage Real Estate Privacy Statement

Our privacy assurance to you

At Vantage Real Estate your privacy has always been important to us. We comply with the National Privacy Principles (new privacy laws that apply from 21 December 2001) as well as our existing obligations of confidentiality.

This policy & other privacy statements

This privacy policy explains how we collect personal information and how we maintain, use and disclose that information. It also provides some detail about your privacy rights along with our general rights and obligations and our policy in relation to the personal information we keep on record.

When you apply for a new product or service, the application form includes notes about privacy and requests for consent. Those privacy notices (called Privacy Statements) specify in more detail how any information about you may be used and disclosed in relation to the particular product or service.

When you apply for use of one of our products or services, you consent to us collecting, maintaining, using and disclosing personal information about you and provided by you or by another person in accordance with the privacy statement in the application form in this policy. This privacy policy does not apply to parties that may be linked or associated with our website. Those website owners are responsible for the privacy of the information they collect and should be contacted directly for details of their privacy policy.

What information does Vantage Real Estate hold?

The types of information we keep on record will depend on the type of product or service requested by you and provided by Vantage Real Estate.

Generally, we keep a record of one or more of the following types of information about you:

1. information that identifies you such as your name and address and other information provided by you and people nominated by you;
2. if you are using our payment systems we will hold records of bank accounts and/or credit card accounts from which transactions are made and other relevant identifying information;
3. if we are providing payment systems to you we will hold records of bank accounts from which transactions are made;
4. account transaction information including credits and debits;
5. dispense and point-of-sale information if you are using one of our pharmacy products.
6. All information sought is required for our business purposes, which are detailed generally in this privacy policy and more specifically in our application forms or on web pages that allow you to contact us.
7. We do not actively seek to collect sensitive information (for example, health information or information about your racial or ethnic origin or any criminal record) unless it is necessary for our business purposes. If we do have to collect sensitive information, we will do so in accordance with the National Privacy Principles.
8. Sometimes we act as an agent for others when collecting information about you, such as for our preferred product suppliers and venture partners. We will tell you when we do this.
9. During the course of our relationship with you, we may gather information about you relating to all products and services that we or other divisions of Vantage Real Estate or our preferred suppliers and venture partners provide to you. This information is used to help us form views about how we can improve our relationship with you.

How Vantage Real Estate collects information from its website

We collect and hold information about you when you:

1. complete an online application or any other type of form;
2. provide us with your email address; or
3. access and use our services through our website.

We also collect some statistical information about visitors from our website, for example, the number of visitors, pages viewed, types of transactions conducted, time online and documents downloaded. Some of this statistical information is collected by using cookies, but none of the statistical information we collect allows us to identify visitors. We use this information to evaluate our website performance and continually improve our services.

Other than statistical information, we do not collect any information about you through our website unless you provide the information to us.

How Vantage Real Estate generally collects your information

Generally, we only collect personal information about you from you, unless it is not reasonable or practical for us to do so, or you consent. For example, you may authorise us to collect information from a third party, like your employer, your bank, or we may engage an agent, to collect information on our behalf or you may be named as a referee or beneficiary in another application for one of our products or services. We may also collect information about you from other divisions of Vantage Real Estate or from publicly available sources such as company registers or land title registries.

How Vantage Real Estate may use your personal information

We use your personal information to:

1. respond to your request or help us process your application for products or services;
2. effectively manage and administer all products and services we provide to you including pharmacy, real estate, payments products and services (for example we may use your email address to communicate with you about the services we provide to you);
3. assess, process and investigate claims in respect of any products we provide to you;
4. ensure our internal business operations are running smoothly which may include fulfilling legal requirements and conducting confidential systems maintenance and testing.

When we request your information we may give some more specific details about the way we use your information.

What rights does Vantage Real Estate have to disclose personal information?

Usually we must get your consent before we tell anyone about you, your accounts or your credit information. You can give us your consent expressly or it may be implied by your conduct.

Sometimes the law requires us to give out information about you. For example, we must give your account details to a court if we are ordered to do so under a subpoena.

Depending on the product or service that we provide to you, if it necessary we may also disclose your personal information to:

1. our external service providers (which may be located overseas) for the purposes of our business, for example organisations that provide card authorisation, clearing and settlement services (such as Visa or Mastercard), Health Insurance Commission, claims investigators, mailing houses, valuers, and real estate agents;
2. any organisation which you request us to or any persons acting on your behalf including your solicitor, accountant, financial adviser or broker - unless you tell us not to;
3. any referees, any person which whom you transact, for example merchants, to process your transactions or any financial institution nominated by you (for example in direct debit).

We will not disclose your health information or information about your medical history unless you tell us to. We may at other times give you more details about our disclosure practices in relation to specific products or services, for example, on the forms we use to collect personal information about you.

How may Vantage Real Estate use your personal information?

Your personal information may also be used by Vantage Real to help assess your total relationship and product holding within Vantage Real Estate, analyse products and services, evaluate the needs of our customers in development products.

We may also provide access to your personal information to divisions of Vantage Real Estate to inform you of products and services offered by any division of Vantage Real Estate or preferred organisations which we think may be of interest or value to you. If you tell us or have previously told us that you do not wish to receive such information, then it will not be sent to you. Your health information or information about your medical history will not be disclosed to other divisions of Vantage Real Estate for this purpose.

How Vantage Real Estate protects the security of your information

We take all reasonable steps to protect your personal information from misuse, loss, unauthorised access, modification or disclosure.

We provide the maximum level of security when you use our online products and services.

We have physical, electronic and procedural safeguards to protect your information which is held by us. For example, your personal information is stored in secure office premises, our electronic databases require logins and passwords for access and/or one of our secured data warehouses. Access to information stored electronically is restricted to staff whose job purpose requires access. We require all staff to maintain the confidentiality of customer information.

Any visitor, for any purpose, to any part of our premises in which customer personal information is kept is required to register with us upon entry, or be accompanied by a member of staff while on the premises. We

use secure methods to destroy or de-identify any personal information as soon as the law permits, provided the information is no longer needed by us for any purpose. Ordinarily, for information about a particular account, we destroy the information seven years from the date you close the account.

Changes to our privacy policy

We may amend this policy from time-to-time. All changes to our privacy policy will require your consent, for example where office security procedures are changed. We will notify you of any change to our information handling policy that requires your consent before being implemented.

What are your rights?

You need not give us any personal information about you or any other person, which may be requested in our communications with you. However, without that information, we may not be able to process an application, fulfil your request or provide you with an appropriate level of service.

Information about our products & services

If you do not want the benefit of receiving information, special offers or exclusive opportunities about products and services (which may be supplied by us or any division of Vantage Real Estate or preferred suppliers or venture partners) which we think may be of interest or value to you, then please tell us. You can do this at any time by writing to us or telephoning us at the contact details listed in our Contact Us page or if you are an internet customer, contacting us by email when you are using that service.

Access to your Information

You can request access at any time to personal information we hold about you. We will process your request within a reasonable time, usually fourteen days for a straight-forward request. More time may be needed, depending on the nature of the request.

There is no fee for requesting access to your information; however, we may charge you a reasonable cost for processing a request.

Sometimes we are not required to provide you with access, for example, if the law says we can deny access. If we refuse you access to your personal information, we will tell you the reason why. If we are not required to provide you with access to the information requested, we will consider, if reasonable, whether the use of a mutually agreed intermediary will allow us sufficient access to meet your needs and ours.

Correction of information

We try to ensure that all information we hold about you, which we collect, use, or disclose is accurate, complete and up-to-date. You must promptly notify us if there are any changes to your personal information. You may ask us at any time to correct personal information held by us about you, which you believe is incorrect or out-of-date. We will deal with your request within a reasonable time.

If we disagree as to the accuracy of the information, you may request that we attach a statement to that information noting that you consider it is not accurate, complete or up-to-date.

If there is anything you would like to discuss, please contact us.

In this policy, reference to "we/us" means Vantage Real Estate.

If you have any questions, concerns or complaints about our privacy policy or practices or would like more information about particular members' privacy policies or practices, please contact us on 02 9356 3300, 9.00am to 5.00pm (EST), Monday to Friday.