

This and the following four pages is the

PRIVACY POLICY OF ALPHA COMMERCIAL PROPERTY PTY LTD



Corporations Act 2001 (Cth)

Dated 17 April 2023

Privacy Policy

1. Policy Statement

Alpha Commercial Property Pty Ltd (ABN: 12 169 135 568) (**the Company**) acknowledges the importance of privacy to its customers, members, business partners, tenants, landlords, staffs and other individuals and entities that the Company has dealings with. The Company is committed to compliance with the *Privacy Act 1988* (Cth) (**the Act**) to protect your personal information.

In accordance with the Act, personal information in this privacy policy means any information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- (a) whether the information or opinion is true or not; and
- (b) whether the information or opinion is recorded in a material form or not.

This Privacy Policy details how the Company deals with or handles your personal information. The information contained in this privacy policy are subject to the requirements of the Act and other laws. Please be aware that the Company may update this privacy policy from time to time.

2. Collection of Personal Information

The types of personal information the Company may collect include:

- your name;
- your home or other address;
- your email address;
- your telephone number;
- your occupation;
- your identification details;
- credit card information, bank account details or any other financial details;
- credit reporting bodies;
- information about your interests, opinions and preferences in connection with the Company's business activities;
- records of your interactions with the Company in connection with the Company's business activities;
- property information, which may include property type, property attributes, property value and other related property information;
- transaction information of properties;
- other information you provide to the Company; and

- any other personal information that may be required in order to facilitate the Company's dealings with you.

Some of the personal information is collected pursuant to law requirements including, but not limited to the *Fair Work Act 2009* (Cth), *A New Tax System (Goods and Services Tax) Act 1999* (Cth), and the *Corporations Act 2001* (Cth).

The Company collects the aforementioned types of personal information in various ways, including but not limited to:

- directly from you, such as via telephone, email or letters;
- from any online form details;
- from your financial institute when you make a payment;
- from your representatives such as your conveyancers, solicitors, builders and agents;
- from your interaction with the Company's employees, agents, website and social media;
- from records of communications and activity;
- from your application or listing enquiries;
- from public sources; and
- from third parties in connection with the Company's business activity.

3. What the Company Does with Personal Information

The Company collects, stores, uses and discloses personal information for purposes including the following:

- to operate the Company's business;
- to assist you with the sale, purchase, renting and listing of a property;
- to assist you to locate a property;
- to respond to your enquiries and requests;
- for background check purpose;
- for recruitment and internal management of the Company's matters;
- for identification;
- for dealings with contractors and business partners;
- to interact with third-parties in connection with the Company's business;
- where you give consent to the Company for the use or disclosure of your personal information;
- for purposes of record-keeping, research, planning, service development, security and compliance with laws;

- to the extent that the Company is authorised by law to do so, and to defend and exercise its legal rights;
- to perform functions and activities relating to the Company's business purposes; and
- to provide you with advertisement and information about the Company. You can notify the Company if you do not wish to receive such information at reception@alphacp.com

You have the option to engage with the Company anonymously. For example, you do not need to share your personal information for general enquires. However, if you choose to interact with us anonymously, we may not be able to provide services to you, make some offers available to you and contact you.

The Company may also use your information for direct marketing. The Company uses your information for promotion and other services in connection with the Company's business purposes. This marketing materials may be sent to you by email, post, phone or SMS. You will have an opportunity to opt out of receiving future marketing materials at any time.

4. Who the Company Shares Personal Information with

The Company may share your personal information with other individuals or organisations such as:

- the Company's employees, contractors, business partners, related subsidiaries and volunteers;
- tenant, landlord, applicant and their legal or financial representatives;
- other people whom the Company may have business dealings with;
- third party service providers such as organisations that assist the Company by providing consulting, website operation, professional service and electronic payment service;
- you and the Company's representatives such as conveyancers, solicitors, valuers, builders and agents;
- data collection agents providing information to valuers and real estate information services;
- professional advisors such as lawyers and accountants; and
- Government authorities and courts.

Some of the third parties the Company shares personal information with may be in countries other than Australia. For example, some third-party service providers in connection with the Company's enterprise service such as Google, Microsoft and PayPal may store the data in numerous locations overseas.

The Company will not send your personal information to any personal located outside Australia unless it is authorised by law and the Company is satisfied that the recipient of the personal information has adequate data protection policy in accordance with the Act.

5. The Company's Website

The Company and the third-party service providers in connection with the Company's business purpose use various technologies such as clickstream, cookies and digital email service.

Clickstream data Collection

The website's server automatically logs and collects clickstream data for statistical and system administration purposes. The types of data collected include:

- the domain name;
- the IP addresses;
- The type of browser;
- aggregate information in relation to the date and time when the Company's website is accessed;
- aggregate information in relation to operating systems; and
- aggregate information in relation to what page is accessed.

Cookies

The Company's website uses cookies to enhance the overall user experience relating to the Company's business purposes.

The Company may use session cookies, and other similar technologies to recognise your device and provide personalisation, as well as to help the Company understand where the Company's visitors are going and how much time they spend there.

You may not be able to access or fully use the Company's website and services if your device does not allow cookies from the Company.

Third party services

The Company's website may use Google services such as Google Analytics. For more information about how Google collects and processes data, please refer to Google's privacy policy.

6. Security

The Company has implemented a number of measures to protect the security and integrity of your personal information in physical and digital form. The measures the Company used include encryption of data, installation of a firewall, premises security, access controls, and backups. The Company stores personal information with the assistance of third-party service providers.

The Company will destroy or de-identify your personal information once it is no longer needed, not contained in a Commonwealth record and not required to be kept by law.

7. Access to and Correction of Your Information

If you wish to request access to your personal information for the purpose of updating, deleting or correcting your personal information, please contact the Company at reception@alphacp.com.au or via the Company's website "[Contact us](#)" form. Someone will contact you within a reasonable period after the request is made.

In some circumstances, the Company may not be authorised by the Act to provide you with access to personal information including for the purposes of amendment. In these circumstances, the Company will provide you with the reason(s) for such refusal.

8. Queries and Complaints

If you have any queries in relation to privacy, your personal information or complaint, please do not hesitate to contact the Company via the methods as set out below:

Email: reception@alphacp.com.au

Address: Alpha Commercial Property, Unit 11, 19-25 Kembla St , Fyshwick ACT 2609

Website: "[Contact us](#)" form

If you make a complaint, the Company may request additional details from you and may need to engage or consult with professional opinion in order to deal with your complaint. The Company will keep records of your request and respond to you in relation to your complaint within a reasonable period after the request is made.

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