

Terrace Tower Group Privacy Statement

Who we are

This Privacy Policy sets out how Terrace Tower Group Pty Limited (ABN 27 002 742 967) and its related entities ("we") collect, hold, use, disclose and otherwise manage Personal Information consistent with the Privacy Act 1988 (Cth) (Privacy Act).

Why we collect Personal Information

We are in the business of managing and operating real estate assets, including shopping centres and commercial office towers. This requires us to constantly collect information in order to better manage and improve your visit. Some of our functions and activities which require the collection of Personal Information may include:

- Marketing initiatives;
- Safety and security;
- General property management;

Where we collect Personal Information, we are committed to comply with the Privacy Act, including only using the Personal Information for the purposes for which it was collected, and application of Personal Information only as set out in our Privacy Policy.

This policy applies to customers, retailers, contractors and all visitors to our properties and/or websites.

We only collect Personal Information that is reasonably necessary for the business functions and activities described above. Whenever it is reasonable and practicable to do so, we only collect Personal Information about you, directly from you, through lawful and fair means.

What Personal Information we collect

Personal Information is defined in Section 6 of the Privacy Act and includes information or an opinion about you, or that can identify you.

Sensitive Information is also defined by Section 6 of the Privacy Act and includes sensitive Personal Information about you, such as racial or ethnic origin, religious beliefs, political affiliations, sexual preferences and criminal records, as well as health and genetic information.

Examples of Personal Information that we may collect, amongst others, include:

- your name;
- your contact details;
- your personal details including for example, date of birth, gender and drivers licence number;
- your business details including your ABN, registered offices and company registration details;
- your personal preferences including for example:

- information about you and your family and any characteristics, preferences or requirements that are relevant to the products and services that we may provide to you;
- any additional information relating to you that you provide to us directly or indirectly through our website, online presence or otherwise. That information may include information regarding what web pages you access;
- information you provide us through our representatives or customer surveys from time to time;
- information about the products and services we have provided;
- financial information about you (including, bank account and credit card details and information relating to your income and credit worthiness); and
- information about your motor vehicle, mobile phone or cellular device which you bring into one of our centres.

We will not generally collect Sensitive Information about you. However, we will ask for you to consent to the collection of your Sensitive Information before this information is collected (unless one of the exemptions under the Privacy Act applies).

How we use Personal Information

The Personal Information that we collect is only collected, stored, used or disclosed for purposes of one or more of the functions and activities listed above and is only accessed on a need-to-know basis.

In line with our functions and activities listed above, amongst others, we may use your Personal Information in the following ways:

- **Marketing initiatives;**
 - When you enter one of our properties, our cameras, ticket-booths or number plate readers will collect information about you, your vehicle and your cellular devices through video and camera surveillance and/or through applications installed or pre-installed on your cellular devices. We will use this information to send you details of special deals or campaigns and other marketing materials based on your web usage or location, to analyse your spending patterns, your preferences and your particular foot flow patterns so that we can give you a more individualised experience of our properties.
 - When you sign up to a competition, we will retain your Personal Information for future promotions and competitions. We also require your Personal Information to contact you about the competition.
 - We may also use your Personal Information to send you newsletters and information about upcoming promotions, discounts and campaigns.
 - We use social networking services such as Facebook, Twitter, Google+, YouTube and Instagram to communicate to customers of the Centre. When you talk with us using these services, we may collect your personal information to communicate with you and the public. The social networking service will also handle your personal information for its own purposes. These

services have their own privacy policies. You can access the privacy policies for these services on their respective websites and applications.

- We may share your personal information to conduct statistical analysis and market research to improve service delivery. We may engage external companies to conduct this research on our behalf.
 - We use data from applications installed on your mobile phone, bluetooth or from your connection to WiFi in our properties to learn more about customer flows and traffic patterns and assists us in determining how we can improve your customer experience. No Personal Information about you is included in this data and the data is completely anonymous. This function is enabled through applications installed on your mobile phone to which you must first agree to allow that application to give us this data.
 - We also use audience measurement tools through our advertising units to aggregate shopper data and to provide insights into customer habits.
 - When you use our WiFi, we may become aware of the websites you visit and your time spent on those websites.
- **Safety and security;**
When you enter one of our properties, our cameras, ticket-booths or number plate readers will collect information about you, your vehicle and your cellular devices through video and camera surveillance. We will use this information generally for the safety, security and management of the properties, which may be provided to government, law enforcement agencies, our staff and contractors, retailers and our services providers; including insurers and their investigators.
 - **General management of the centres;**
 - When you hire equipment from us or purchase gift cards or other items from us, we collect your information for the purposes of maintaining records of these things, and so that we can notify you of similar goods or services in the future.
 - We collect your Personal Information to assess and manage complaints, suggestions or feedback.
 - If you are a tenant, we may collect your information to understand your business dealings, evaluate the performance of the property, manage our relationship with you and to gain insight into your customers.
 - If you are a contractor, we may collect your Personal Information in connection with the services you provide us.

We will not use any Personal Information for any other purpose without your consent or unless we are authorised to do so by Law.

We may use your Personal Information for the purpose of sending you information, including direct marketing. If at any time you no longer wish to receive such information from us, you can elect to opt out by contacting our Privacy Officer using the details set out at the end of this Privacy Policy or by opting out directly at the following link: privacyofficer@ttgroup.co

We do not sell your Personal Information to any organisations for the purpose of allowing such organisations to send you marketing or other information.

Disclosure of Personal Information

We may disclose Personal Information about you when:

- You allow us to;
- We use it for the purpose that we collected it;
- We are required to disclose it by Law; or
- We share information with our related companies.

We may need to disclose your Personal Information to third parties to enable us to conduct our business and provide our services.

Third parties that we may disclose your Personal Information to include:

- Our related bodies corporate, including to enable us to provide you with a product or service;
- service providers and business associates, in order to enable them to provide services and financing in connection with the business purposes described above (see 'Use of Personal Information'). When we contract with these organisations, we take reasonable steps to ensure that the organisations protect your Personal Information from misuse, interference and loss, as well as from unauthorised access, modification or disclosure.
- people authorised to act on behalf of you, where you request that we disclose your Personal Information to that authorised person; and
- law enforcement agencies, government agencies, regulators, courts or external advisers, in relation to compliance or law enforcement matters.

Cross-Border Disclosure of Personal Information

We do not disclose your Personal Information to recipients located outside the borders of Australia.

Storage and Security of Personal Information

We use security techniques and processes to take reasonable steps to store and protect your Personal Information from misuse, interference and loss, as well as unauthorised access, modification and disclosure. Only our employees and contractors and those who perform services on our behalf for the business purposes described above (see 'Use of Personal Information') and who are authorised to handle Personal Information, will have access to your Personal Information.

We review our security arrangements for storing Personal information regularly and implement improvements as appropriate.

We will store your Personal Information for the minimum time required to achieve the purpose for which we collected it.

Australian Privacy Principles

When we handle personal information about you, we are bound by the Privacy Act and the Australian Privacy Principles. In some circumstances, the handling of records relating to our current or former employees is exempt from the Australian Privacy Principles.

Right of Access to Your Information

Under the Privacy Act, you have the right to access your Personal Information held by us, subject to some exceptions. For example, we may not be capable of providing you with access to your Personal Information where giving access would have an unreasonable impact on the privacy of other individuals.

We will take reasonable steps to ensure that your Personal Information, that we collect, hold, use or disclose is up-to-date, accurate and complete.

If your Personal Information held by us is inaccurate, out-of-date, incomplete, irrelevant or misleading, then you have the right to request that TTG take reasonable steps to correct it. We will respond to your request for access or correction to your Personal Information within a reasonable period after your request is made. Where it is reasonable and practicable to do so, we will provide access to the Personal Information held by us in the manner requested by you.

If we are unable to agree that your Personal Information is inaccurate, out-of-date, incomplete, irrelevant or misleading, you may ask us to place with the Personal Information that you believe is inaccurate, out-of-date, incomplete, irrelevant or misleading a statement by you claiming that the particular Personal Information is inaccurate, out-of-date, incomplete, irrelevant or misleading.

If you wish to exercise your rights of access and correction of your Personal Information held by us, please contact our Privacy Officer, whose details appear at the end of this Privacy Policy.

Changes to Our Privacy Policy

This Privacy Policy relates to our current privacy standards. We may vary our Privacy Policy from time to time. TTG will update the Privacy Policy on this website as soon as practicable following any such variation.

Cookies

A cookie is a small text file that a website may write to your hard drive when you visit TTG's website. A cookie file can contain information, such as a user ID, that the website uses to track the pages you have visited. The only Personal Information a cookie can contain is

information that you personally supply. A cookie cannot read data on your hard disk or read cookie files created by other websites.

TTG's websites may use cookies to track user traffic patterns and to better serve you when you revisit the website. You can set your browser to notify you when you receive a cookie, providing you with the opportunity to either accept or reject it. You can also refuse all cookies by turning them off in your browser.

Links on TTG's Website

TTG's website may, from time to time, contain links to the websites of other organisations which may be of interest to you. When you visit a linked website, the organisation responsible for that website is responsible for complying with the Privacy Act in relation to Personal Information that it collects from you and the privacy statement on that website will apply to the collection, storage, use and disclosure of any of your Personal Information that is collected by them.

Contact Us About Privacy

If you:

- want to access, update or correct your Personal Information;
- want more information concerning how we handle Personal Information or any privacy issues; or
- have a complaint in relation to privacy

You should contact our Privacy Officer:

Attention: Privacy Officer

Terrace Tower Group

PO Box 109

Double Bay NSW 1360

Telephone: 02 9332 2744

Email: privacyofficer@ttgroup.co

If you are unhappy with TTG's handling of your complaint or you do not agree with the resolution proposed by TTG's Privacy Officer, you may make a complaint to the Office of the Australian Information Commissioner (OAIC) by contacting the OAIC using the methods listed on their website (<http://www.oaic.gov.au/about-us/contact-us/>) Alternatively, you may request that we pass on the details of your complaint to the OAIC directly.