

## Longton Group Privacy Policy

Effective Date: 23 May 2014

### PLEASE READ CAREFULLY

This is the Longton Group privacy policy ("Privacy Policy" or "Policy"), revised and effective as of 23 May 2014, which applies to Longton Capital Pty Ltd ("Longton Capital", "we", "us", "our") and its related bodies corporate and Affiliated Entities (such as Longton Real Estate Pty Ltd). Please refer to section 9 of this Privacy Policy for a complete list of entities and websites to which this Policy applies.

We recognise the importance of protecting your privacy. The purpose of our Privacy Policy is to:

- assist you in understanding how we collect, use, disclose and protect the Personal Information you provide to us;
- assist you in making informed decisions in relation to your dealings with us; and
- explain how you can access and correct the Personal Information we collect and hold about you.

The Longton Group is bound by the *Privacy Act 1988* (Cth) ("Privacy Act") and will handle and protect your Personal Information in accordance with the Australian Privacy Principles ("APPs").

We may amend this Privacy Policy from time to time to reflect changes in our personal information handling practices. Please check this policy for updates periodically. We will try to post any changes to this Privacy Policy before they become effective. If we make any material changes to this Privacy Policy, we will notify you here, by email or by means of a notice on the home pages of our Longton Group Websites.

Please note: by using or registering with any Longton Group Websites or by providing Personal Information to us, you agree to the terms of this Privacy Policy.

### 1 THE TYPES OF PERSONAL INFORMATION WE COLLECT AND HOLD

The Longton Group only collects Personal Information which is reasonably necessary for its dealings with the individuals to whom the information relates.

The types of Personal Information that we collect will depend on the particular dealings we have with you. However, generally, we collect and hold Personal Information about:

- purchasers, or potential purchasers, of Longton Group property, products or services (such as a Longton apartment, Sino Australian Seniors Association ("SASA") registration, lifestyle purchase, home automation purchase, myiButler services, or when responding to requests for information about these products or services);
- individuals who register or subscribe to Longton Group Websites and applications, including our myiButler applications;
- visitors to our display centres and showrooms;
- our third party suppliers (for example, when establishing records and systems to enable payment for goods or services);
- job applicants (for the purposes of seeking employment opportunities with the Longton Group);

- individuals as shareholders in Longton Group securities; and
- other individuals who may come into contact with the Longton Group.

The type of Personal Information we hold about these individuals includes, but is not limited to:

- personal identifiers, such as name, address, contact details and date of birth;
- an individual's payment details for the purpose of processing the purchase of our products and services;
- information about the individual that is required or authorised by law;
- sensitive information about individuals collected in connection with the Longton Group's myiButler services (such as health information); and
- individuals' opinions about our products, services and/or staff.

In certain circumstances, the Longton Group may collect sensitive information if it is reasonably necessary to allow us to deal with the individual and the information has been collected with their consent. The collection of sensitive information, which includes health information, may be necessary to provide you with certain products and services such as the myiButler and Longton Home Automation services.

### **Marketing Data**

We may also collect marketing-related data from third parties. This data is combined with information we already hold, including personal information that you provide to us, for the purpose of providing you with more useful and targeted information about products and services across the Longton Group.

### **Website cookies**

We also generate and collect information through website cookies whenever a page is accessed on a Longton Group Website. A cookie is a small data file that may be placed on your computer (usually in the browser software folder) during a visit to our websites. Cookies are necessary to allow the Longton Group Websites and your computer to interact effectively and to enhance security. Cookies can record information about your visit. This information assists us to better understand your needs.

The type of information we automatically collect when you visit a Longton Group Website includes the following:

- your computer's operating system;
- your computer's browser type and capabilities;
- your computer's Internet Protocol (IP) address and geolocation;
- the web pages you have visited, including how you were referred to each web page; and
- web page usage statistics, including the time spent on each web page.

If you do not wish to receive any cookies, you should set your browser to refuse cookies. However, doing so may mean you will not be able to use all features of the relevant Longton Group Website.

We will not identify your browsing activities, except where we are required to do so by law.

## **2 HOW WE COLLECT AND HOLD PERSONAL INFORMATION**

The Longton Group collects Personal Information in a number of different ways. Whenever it is reasonable and practicable to do so, the Longton Group will only collect Personal Information directly from the individual to whom that information relates. However, in some circumstances, Personal Information may be provided to the Longton Group by third parties, such as an individual's agent. Where this occurs, we will take reasonable steps to inform the individual, or otherwise ensure he/she is aware, that we have collected this information, unless it is obvious from the circumstances.

### **Security of Personal Information**

The Longton Group will take reasonable steps to protect your Personal Information that it holds from misuse, interference and loss, and from unauthorised access, modification and disclosure. We hold the Personal Information we collect on secure servers or in physical storage located in controlled environments. All employees of the Longton Group are required to maintain the confidentiality of any Personal Information they handle.

If other parties provide support services to the Longton Group, we require them to implement appropriate safeguards to protect the privacy of the Personal Information we provide to them. This may include requiring our contractors to execute non-disclosure agreements to ensure the confidentiality of Personal Information.

## **3 HOW WE USE AND DISCLOSE PERSONAL INFORMATION**

Longton operates a number of businesses which handle Personal Information. Our policy is to only use Personal Information for the primary purpose for which it was collected, or for a secondary related purpose where you would reasonably expect us to use, or disclose the Personal Information for that secondary purpose. We may otherwise use and disclose your Personal Information if you have given us consent for the use or disclosure, or if it is required or authorised by law.

In general, we use Personal Information for the following purposes:

- providing you with the products or services you have requested;
- to communicate with you;
- to assess your suitability as a prospective tenant for Longton Group properties;
- to help us manage and enhance our products and services, including analysing customer feedback and future customer needs;
- to provide you with ongoing information about our products and services;
- to comply with our regulatory and legal obligations; and
- to recruit employees and engage contractors.

If you do not provide all the Personal Information we request from you, we may not be able to provide our products or services to you.

### **Website registration**

When you visit or transact business through Longton Group Websites, our showrooms, retail store, lifestyle store, apps, or social media, you may be required to register with us or be requested to provide us with Personal and Account Information.

To enable your registration, we will ask you to provide us with a member name and password, your name, address and phone number and a valid email address. We ask that you keep your password strictly confidential so as to ensure the security and integrity of your personal information.

### **Disclosure of Personal Information**

Entities within the Longton Group share Personal Information with each other subject to the requirements of the Privacy Act. This includes the sharing of Personal Information with our Affiliated Entities, a list of which is set out at section 9 of this Policy.

For instance, when Longton Real Estate Pty Ltd collects Personal Information from individuals visiting its display centres or showrooms, this information is made available to other entities within the Longton Group, (including Longton Capital) for use in sending you information about their products and services (such as myiButler, Longton Home Automation, Longton Property and Longton Lifestyle products and services) and SASA. You can opt out of receiving information about products and services from any or all of the entities within the Longton Group by emailing us at [marketing@longton.com.au](mailto:marketing@longton.com.au).

Personal information collected by entities within the Longton Group, including by Affiliated Entities such as Longton Real Estate Pty Ltd, may also be shared with Longton Capital, which provides accountancy and administrative services to the other Longton Group entities.

In addition, we may also disclose Personal Information to entities outside the Longton Group in certain circumstances. These entities include, but are not limited to the following:

- our contractors and service providers who assist the Longton Group in the operation of its business or to provide a customer service (for example, a contractor that helps us maintain our computer systems, provides our payment gateway system, or sends out Longton Group mail);
- joint venture partners for the purposes of seeking relevant regulatory approvals;
- third party lenders and insurers;
- to assist Longton in the operation of its business to provide the products and services you request. For instance, when you order your myiButler service, we may disclose your Personal Information (including sensitive information) to our service providers, which assist us in providing the service to you. The service providers to which we disclose your Personal Information are subject to strict obligations of confidentiality in their handling of the information;
- the Australian Securities and Investments Commission and other government agencies or enforcement agencies as authorised or required by law; and
- anyone authorised by you to access your Personal Information.

The Longton Group only provides external entities with the Personal Information they require to perform services for us or that we are legally obliged to give. We require our service providers to agree to handle Personal Information in accordance with the Longton Group Privacy Policy and to comply with strict contractual conditions governing how this information may be used and stored.

Longton may sometimes disclose Personal Information to recipients located outside Australia in order to allow our contractors to perform services for us. The overseas entities to which we disclose personal information include service providers that provide direct marketing services. The location of these recipients include China, Korea and Indonesia. If we disclose Personal Information to overseas recipients, we do so in accordance with the APPs.

It is our policy not to sell Personal Information to entities outside the Longton Group.

#### **4 HOW WE USE AND DISCLOSE PERSONAL INFORMATION FOR MARKETING PURPOSES**

The Longton Group collects, uses and discloses Personal Information to keep you informed about our latest news, products and services.

To this end, we may offer you the option to sign up to receive our newsletters, magazines, social media or announcements/updates and promotional offers. We may send you this information using the personal email address you provided while registering on the Longton Group Websites.

If you elected to opt-in to receive any of our email lists and/or other marketing material and you later decide that you no longer wish to receive this material from us, you may unsubscribe by following the instructions contained in each email we send to you. Alternatively, you can opt-out by contacting the Longton Group on [marketing@longton.com.au](mailto:marketing@longton.com.au). We will act and amend our records promptly in response to any unsubscribe request we receive.

#### **5 APPLYING FOR EMPLOYMENT WITH LONGTON**

Longton collects Personal Information from individuals who submit applications or register interest for employment with a Longton Group entity. If the application is unsuccessful, Longton may retain the information in case a future, or more appropriate, opportunity becomes available. Applicant information may also be shared with other Longton Group entities for consideration against employment opportunities (if any) within the corporate group.

The unsuccessful applicant will be advised that he or she can contact Longton to request Longton not to retain the applicant's information.

#### **6 ACCESS TO PERSONAL INFORMATION**

The Privacy Act gives individuals the right to access the Personal Information we hold about them. To obtain access to your Personal Information, please email the Longton Group (contact details below) with specific details as to the type of Personal Information to which you seek access. Before we provide Personal Information to you, we will require you to verify your identity by providing us with, for example, a copy of your driver's licence.

This service is free of charge unless the Personal Information requested requires preparation time. In this situation, Longton will provide an estimate of how much this service will cost and request your agreement to the cost before proceeding.

Generally, we will provide individuals with access to Personal Information we hold about them. However, in some circumstances, there may be legal, regulatory or administrative reasons to deny access to the requested information. If access is denied, the Longton Group will provide the individual with reasons for the denial.

#### **7 CORRECTION OF PERSONAL INFORMATION**

If you wish to correct or update Personal Information that we hold about you, please email the Longton Group using the contact details below and requesting the specific changes that need to be made.

#### **8 PROBLEMS, QUERIES OR COMPLAINTS**

For further information about this Privacy Policy, to seek access to your personal information, or to make a complaint about a breach of the APPs, please contact us by emailing [admin@longton.com.au](mailto:admin@longton.com.au) or by calling 02 9283 8600. We will investigate any complaints received in writing and do our best to resolve them with you as soon as possible.

If you are not satisfied with the result of your complaint to us, you can refer your complaint to the:

Office of the Australian Information Commissioner  
Phone: 1300 363 992  
Post: GPO Box 5218, Sydney, NSW 2001

Online privacy complaint form: [www.oaic.gov.au](http://www.oaic.gov.au)

You are always free to contact us with a question or problem related to your interactions with us or a Longton Group Website. Our standard business practice is to retain any communications from visitors to a Longton Group Website to help us to better service our existing and prospective customers.

## **9 LINKS TO OTHER WEBSITES**

The Longton Group Websites may contain links to third party websites. We are not responsible for the privacy policies of any third party websites. We recommend that you review the privacy policy of each website you visit.

## **10 CHANGES IN THE FUTURE**

The Longton Group reserves the right to review, amend, update and change this Privacy Policy from time to time to reflect its practices and obligations. We will notify any changes we make by posting an updated version of the Policy on the Longton Group websites. Any changes will take effect when they are posted on our websites.

## **11 MEANING OF WORDS:**

“Affiliated Entities” means:

- Sunstar Capital Pty Ltd;
- Anchor Resources Ltd;
- Longton Real Estate Pty Ltd; and
- the Sino Australian Seniors Association.

“Longton Group”, “we”, “us”, “our” means:

- Longton Capital Pty Ltd;
- Longton Lifestyle Pty Ltd;
- Longton Home Automation Pty Ltd;
- myiButler™ Pty Ltd; and
- Affiliated Entities.

“Longton Group Websites” means:

- [longton.com.au](http://longton.com.au)
- [myiButler.com.au](http://myiButler.com.au)
- [longtonlifestyle.com.au](http://longtonlifestyle.com.au)
- [avantraicommunity.com.au](http://avantraicommunity.com.au)

- [theuptown.com.au](http://theuptown.com.au)
- [futra.com.au](http://futra.com.au)
- [facebook.com/longtonproperty](https://facebook.com/longtonproperty)
- [plus.google.com/111607702682460090369/posts](https://plus.google.com/111607702682460090369/posts)
- [twitter.com/longtonproperty](https://twitter.com/longtonproperty)
- [linkedin.com/company/myibutler](https://linkedin.com/company/myibutler)
- [linkedin.com/profile/view?trk=nav\\_responsive\\_tab\\_profile\\_pic&id=304137869](https://linkedin.com/profile/view?trk=nav_responsive_tab_profile_pic&id=304137869) Longton Property Group
- [pinterest.com/longtonp](https://pinterest.com/longtonp)
- [longtonpropertygroup.wordpress.com](http://longtonpropertygroup.wordpress.com)
- [youtube.com/user/longtonpropertyau](https://youtube.com/user/longtonpropertyau)
- [weibo.com/longtongroup](http://weibo.com/longtongroup)
- [i.youku.com/longtonproperty](http://i.youku.com/longtonproperty)
- [sunstargrp.com](http://sunstargrp.com)
- [anchorresources.com](http://anchorresources.com)
- [sasa2011.org.au](http://sasa2011.org.au)

“Personal and Account Information” means your name, company name, account number, address, telephone number, e-mail address, subscription details (i.e., particular types of markets or property types on which you request information), and any other information that personally identifies you or would enable us to contact you.

“Personal Information” means information or an opinion about an identified individual or an individual that is reasonably identifiable.

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