

# Privacy Policy

## 1.1 WHAT INFORMATION DO WE COLLECT?

### Customers

We collect information about customers in a number of different ways. These include the following:

- In connection with competitions or signing up to email or on-line newsletters or communications (either in person, or online), customers provide us with their contact details. When you do so, your details are entered into our database(s), and are used to contact competition winners, inform customers about events, activities and promotions.
- If your details are entered into our database, you may opt out of receiving further communications (either at the time of providing your details, or at a later time).
- If you enter into any transactions and dealings with us, or apply for any special assistance or facilities, you may be required to provide us with contact details. This information will be used for the purpose of those transactions, including our keeping records of them. Unless you have opted out of receiving further communications, we may also use those details to inform you about events, activities and promotions.
- People entering our property (including shopping centres and car parks) may be subject to video and camera surveillance, and personal information collected, including images of persons, cars and car licence plate details. We may collect personal information from you or third parties (such as police and retailers) in connection with the management and security of our centres. This information may be provided to government bodies, including local councils and law enforcement, our staff and management agents, our service providers, insurers and tenants for those purposes.
- When people park in our car parks, we may collect car licence plate details, and in some circumstances other details such as names and email addresses. These details are used for managing the car parks (and fees, if paid parking is in place), ensuring compliance with car park rules, assisting customers to locate cars (where this facility is provided) and analysing car park dwell times and shopper behaviour and for marketing purposes.
- When people use mobile applications provided by us, or log on to our wi-fi or other telecommunications infrastructure, they provide us with certain information, including their contact details. We collect this information to enable customers to be informed of activities in the centre (including retailer and sponsor offers and promotions), upcoming events, activities and promotions. This information will be notified to people when using those applications or facilities.
- When persons purchase or redeem gift cards, they may provide us with their contact details. We may also collect information about purchases made with those cards, for the purpose of payment of retailers, and debiting money spent from the balance of the card. That information is used for card fulfilment purposes, and if you do not opt out (or opt in, as the case may be) we may also use those details to inform you about events, activities and promotions.
- If we collect donations on behalf of any charitable organisations, we may collect personal information for the purpose of that payment, and to assist the organisation with providing a tax receipt.

## **Website and WiFi use**

In addition to the above, if you use our website or any WiFi services we provide:

- You may provide any or all of your name, email address, telephone number, address, gender and if required for the purpose of payment your credit card or other payment details.
- You might view products from participating retailers;
- You might shop with participating retailers (or be directed to their on-line shopping platforms);
- You might subscribe to membership of the site or email communications from us;
- You might purchase gift cards;
- You might submit your resume (and other personal information) for consideration in relation to any advertised or potential job vacancies;
- You may join, and provide information to feedback network or forum relating to the centre;
- You may complete surveys;
- You may communicate with us through the website.

We collect your personal information for the purpose of facilitating the above, your access to the site, and the functionality of the website, and your use of our WiFi services. If you do not provide that information, access to or the operation of our WiFi services, all or part of the site, or those functions may be prevented or may be impaired.

Whenever you use our website, or any other website, the computer on which the web pages are stored (the Web server) needs to know the network address of your computer or other device so that it can send the requested web pages to your Internet browser. The unique network address of your computer is called its "IP address," and is sent automatically each time you access any Internet site.

We also may collect and retain your IP address, domain name, MAC address or Device ID number, date and time of accessing webpages or services, URLs of sites visited through our systems, details of apps and browsers used using our systems, cookies which track visits to our websites, to enhance the operation of our systems, and for security purposes. We or our service providers also may keep a record of this information for security reasons, such as identifying the source of a suspected security incident (for example, a virus infection, an attempted hack or denial of service attack).

In addition, if you use our WiFi services, we may record the dates, times and locations you use those services, and if you sign onto our WiFi or website using a social media ID we may record publicly available social media posts, personal information and demographic data which we obtain from those social media platforms.

We may also conduct device monitoring of Wi-Fi-enabled devices, including the collection of MAC address and location updates from such devices, without collecting other personal information.

Please note that some of these functions may not be currently available, or may only be available at particular times (eg submission of resumes may only be available when we have advertised a vacancy and stated that applications may be made online through this website).

This site is an Australian based website, and it is not intended to provide services to EU residents. While we will take steps to ensure privacy protection, those steps may not be fully compliant with the General Data Protection Regulation. If you are an EU resident and use the website, you do so on the terms of the website, at your own risk and on the basis that use is not covered by EU laws and in particular the General Data Protection Regulation.

### **Use of Customer Information**

In addition to the above uses (set out in the sections headed Customers and Website Use), we may use the this information for the purposes of management and security of the particular centre, and for shopping centres generally (in which we or a related company may have an ownership interest), to obtain feedback about our centre or retailers in them, and may be provided to law enforcement and government bodies, our insurers, our staff, contractors and service providers, and retailers for these purposes.

Where we collect information about you at different times, in different ways and for different purposes, we may connect that information and use it for any of the purposes for which we have collected the information. We may update that information if you provide us with different details at a later time.

If you specifically and knowingly provide any personal information to us (including via this website), you consent to Phoenix Shopping Centre using that personal information lawfully at its sole and absolute discretion, including for the purposes of providing promotional and marketing materials by other means. You must obtain the consent of any third person whose personal information you provide to us or post to this website to its provision, posting and subsequent disclosure and use.

### **Retailers**

Phoenix Shopping Centre may collect the following types of information from retailers, their directors, shareholders and guarantors, and other persons associated with or employed by retailers during negotiations for, and during and after the term of, leases, licences and other arrangements at the Centre:

- Name, address, gender and date of birth
- Contact and insurance details
- ABNs
- Information as to financial standing and assets, and retailing experience
- Other financial and trading information.

Phoenix Shopping Centre requires this information to make decisions about proposed transactions with the tenant, to prepare documents for the transaction, to deal with the tenant and its representatives before, during and after the term of any arrangement, and to effectively manage the centre. The information may be made available to others for those purposes, including to our managing agents, bank and advisers, and in the event of a sale of an interest in the Centre, to proposed buyers.

If a retailer provides us with direct credit or direct debit details, we will disclose them only for the purpose of the payment arrangements for which they are provided.

As noted above (in the Customer section), we collect information about persons attending the centre or using any of our services. This information may also be collected about

retailers and their employees, contractors and representatives, and will be used in the same manner set out above.

## **Suppliers**

If you are a supplier or an employee or contractor to a supplier of Phoenix Shopping Centre, we may collect personal information from you, which may include:

- Name, address, gender and date of birth
- Contact and insurance details
- ABNs
- Information as to financial standing and assets, and qualifications, certifications and experience
- Other financial and trading information
- Any other information provided during induction and compliance procedures
- As set out in the Customer section above, information about persons attending the centre or using any of our services. This information may also be collected about suppliers and their employees, contractors and representatives, and will be used in the same manner set out above.

This information will be used for the purpose of managing the provision of goods and services, and the centre generally.

## **Employees**

If you are an employee or potential employee of Phoenix Shopping Centre, or its owner, we may collect personal information about you for the purpose of your employment or possible employment. This may include your name, address, gender and date of birth, banking details, superannuation details, contact details, referees and next of kin, and any other information provided during recruitment, induction and compliance procedures, and during the course of your employment, including information about your performance.

This information will be used for recruitments, and in managing your employment and our business, in accordance with our legal obligations, including the Privacy Act 1988 (Cth).

### **1.2 DO WE DISCLOSE INFORMATION ABOUT OUR USERS TO ANYONE ELSE?**

We may share general information about the use of our site with service providers, advertisers, sponsors, content providers and other third parties. However, we generally only disclose (to persons other than our staff and service providers) aggregated, anonymous information about our users and except where otherwise specifically required to do so or for security reasons, will not disclose any personally identifiable information to any third party for marketing purposes without your approval. On occasions it may become necessary to release personal information, including if we are required to do so to satisfy a legal obligation.

For example, we may disclose the total number of "hits" our sites receive, or how often the average user visits our site, or which terms are most often entered in our site search engine. Further, as a necessary adjunct to the proper operation of our website, our staff, advisers

and technical contractors, who are subject to obligations of confidentiality to us, may gain access to personal information as part of their service.

While our site is Australian, some of the data collected (either on-line or through other methods) may be stored on servers in other countries, or processed in other countries. The entities providing that storage and processing are subject to duties of confidence to us, and we require them to use the information in accordance with this policy.

We use reasonable endeavours to keep all personal information in a secure environment, but due to the nature of the internet, this security cannot be guaranteed. If you believe that your personal information has been subject to unauthorised use or disclosure, please contact us.

### **1.3 DO WE KEEP EMAIL WE RECEIVE FROM YOU?**

We receive and reply to email from users on a regular basis. For record-keeping purposes we retain copies of most emails sent to us. The information in the email may be disclosed for the purpose of dealing with its subject matter, and otherwise we do not anticipate that the information in the email we receive or send will be disclosed to any third party without the permission of the sender, either express or implied, unless required or necessary as specified in the previous paragraph.

### **1.4 CORRECTION OF INFORMATION**

We take reasonable steps to keep your personal information in our data base accurate and up to date. However, if you believe we hold incorrect personal information about you, please contact us, and we will take reasonable steps to keep it up to date.

If we hold your personal information for marketing purposes, and you wish us to remove that information held for that purpose, please contact us, and we will take reasonable steps to remove that data from our current marketing database. This will not include removing that information from archived records, or from records that we hold for other purposes (e.g. accounting records of transactions with us).

### **1.5 LINKS TO OTHER SITES**

Our website may contain links to other sites that are not affiliated or associated with, or controlled by Phoenix Shopping Centre. Please be aware that these other sites may be owned or developed by people over whom we have no control, and accordingly we are not responsible for their privacy practices. This Privacy Policy applies only to those parts of our website within our control and not any information collected by those other sites.

We encourage you to familiarise yourself with the privacy policy of any other website you visit which collects personal information about you, and to use your discretion when providing such information.

### **1.6 CHANGES TO THE PRIVACY POLICY**

We may change this Privacy Policy from time to time at our discretion and without notice. If any such changes are made, we will make all reasonable effort to bring those changes to the attention of our users. An updated version of our Privacy Policy will be maintained on this website so that you remain aware of the data we collect, how we use it, and under what circumstances we disclose it.

## **1.7 FURTHER INFORMATION**

Please feel free to contact us at if you have any questions, comments or would like more information concerning privacy issues.