

Privacy Policy

CHP Management Pty Ltd ACN 168 793 253 (**CHP, us or we**) is a specialist property management company which manages a diverse portfolio of commercial, industrial and retail properties.

CHP is committed to protecting your privacy and aims to comply with its obligations under the *Privacy Act 1988* (Cth) (**Privacy Act**).

This Privacy Policy explains how we collect, disclose, store, use and handle your personal information.

Key Concepts

"CHP Properties" means industrial, office and retail shopping centres owned or managed by CHP.

"Personal information" has the meaning specified in the Privacy Act. Personal information generally refers to information or an opinion about an individual who is identified or reasonably identifiable. For example, personal information includes an individual's name, date of birth, address, and telephone number.

"Sensitive information" has the meaning specified in the Privacy Act. Certain types of personal information are categorised as sensitive information and are subject to additional protection under the Privacy Act. For example, sensitive information includes an individual's health information or criminal record.

"Credit information" has the meaning specified in the Privacy Act and relates to an individual's credit history, current credit arrangements and credit worthiness.

"Credit eligibility information" has the meaning specified in the Privacy Act and includes:

- credit reporting information, as defined in the Privacy Act, provided by credit reporting bodies about an individual; and
- credit worthiness information about an individual, which CHP derives from credit reporting information.

Exemptions

Where permitted by law, CHP relies on the employee records exemption under the Privacy Act and other applicable exemptions under relevant laws.

What types of personal information do we collect?

CHP may collect the following types of personal information from:

- **customers and visitors to CHP Properties** – name and contact details (physical address, postal address, email address and telephone number), payment information, car licence plate information, photos and videos in which the individual appears;
- **current and potential employees and contractors** – name and contact details, information contained in any application for an employee or contractor role, information obtained from referees, pre-employment checks and interviews, employment history, resumes, government-issued identifiers (including tax file numbers), bank account information, superannuation information, car licence plate information, photos and videos in which the individual appears, training, attendance and performance records, sensitive information (including health information and criminal record checks);
- **current and potential tenants, their personnel and related individuals such as lease guarantors** – name and contact details of key personnel, ABN, credit and bank account

information, operational and trading information, insurance information, guarantor information;

- **suppliers, service providers and their personnel** – name and contact details of key personnel, position, ABN and bank account information;
- **owners of CHP Properties** – any personal information provided to us about owners of CHP Properties for the purposes of managing their interests in such properties, including their name and contact details, bank account information and government-issued identifiers (including tax file numbers); and
- **individuals who contact us** – any information provided to us by individuals who contact us, including their name and contact details.

CHP also collects technical information and general analytics data from individuals who access and use its websites, and may collect further types of personal information as required or permitted by law.

How does CHP collect personal information?

CHP collects personal information about you directly from you, including when you:

- visit CHP Properties and any car parks which form part of these properties, through CCTV cameras or when you use CHP's on-site services (e.g. any mobility services);
- apply to become an employee or contractor of CHP or communicate with us in relation to your existing employee or contractor role;
- apply to become a tenant in a CHP Property or communicate with us in relation to your existing tenancy;
- participate in trade promotions, competitions or loyalty and rewards programs or agree to receive direct marketing communications from us;
- access and use CHP websites;
- contact CHP via the internet, email, social media, phone, in person or by any other means, including to submit an enquiry, feedback or a complaint; and
- otherwise provide your personal information to CHP.

CHP may collect credit information and credit eligibility information from credit reporting bodies about you when you seek to become a tenant (or a guarantor for a tenant) or if you default in any payment to us. The types of credit information and credit eligibility information CHP may collect about you include:

- information about your employer, position held and income;
- your consumer credit liability information;
- information relating to your commercial credit activities;
- your repayment history information;
- information request statements from credit providers, mortgage insurers or trade insurers;
- default information, payment information, new credit arrangement information, court proceedings information and personal insolvency information about you; and

- other publicly available information related to your credit worthiness.

In certain circumstances, CHP may collect personal information about you from third parties, including from:

- owners of CHP Properties;
- tenants, service providers, suppliers and contractors (e.g. in relation to a health and safety incident which occurs at a CHP Property or in order to check the credit worthiness of a prospective tenant or their guarantor);
- referees and parties who conduct pre-employment checks on CHP's behalf relating to potential employees and contractors;
- publicly available sources; and
- any third party who is permitted to provide us with your personal information.

CHP uses cookies and similar technologies (including Google Analytics) on and in relation to its websites. Cookies are data files that are placed on your device and often include an anonymous unique identifier. These technologies are used to monitor and improve your experience on CHP's websites. If you choose to disable cookies, this may affect your experience of CHP's websites.

Google Analytics assists us to understand your use of CHP's websites. If you would like more information about how Google uses personal information, please refer to Google's [Privacy Policy](#).

By accessing and using CHP's websites, you consent to CHP's use of the above technologies.

Do I need to provide my personal information to CHP?

If you wish to contact CHP for the purposes of making a general enquiry, you can inform us that you wish to remain anonymous or you can use a pseudonym. In these circumstances, you do not need to provide any personal information to CHP.

However in any other circumstances, if you do not provide your personal information to CHP, this may affect the ability of CHP to conduct its business. For example, this may have an impact on CHP's ability to provide you with assistance, information or services or consider your application.

How does CHP use personal information?

CHP generally collects and uses personal information to conduct its business and manage the CHP Properties, including for the following purposes:

- to ensure your health, safety and well-being in the CHP Properties, including to manage any risks to your health, safety and well-being;
- to consider your application, including an application to become a contractor or employee of CHP or a tenant in a CHP Property, and to conduct checks with third parties in relation to your application (including credit, criminal record and pre-employment checks);
- to provide you with goods and services, including car park, concierge and mobility services;
- to receive goods and services from you;
- to manage its relationships with customers, visitors, employees, contractors, tenants, property owners, suppliers and other stakeholders;
- to conduct trade promotions, competitions, loyalty and rewards programs and events;

- to verify your identity (e.g. if you request access to your personal information); and
- to communicate with you and to respond to your communications, including about any of the above matters.

We may also collect and use your personal information for purposes which are related to the above purposes, for other purposes to which you have consented or as otherwise permitted or required by law. These purposes may include administrative, marketing (including direct marketing), market research, operational and quality control purposes.

Direct Marketing

CHP may engage in direct marketing including via email, post, SMS, MMS, targeted digital advertising, phone calls or any other means. We may use and disclose your personal information for the purpose of direct marketing where:

- we have your consent to do so; or
- we are otherwise permitted to do so by law.

You can opt-out of receiving direct marketing communications at any time by contacting us or by using the unsubscribe facilities provided in direct marketing communications.

Who does CHP disclose information to?

CHP discloses personal information to:

- suppliers and service providers, including insurers, market researchers, professional advisers and providers of IT, marketing, recruitment, security and communications services;
- tenants and owners of CHP Properties in the course of providing property management services;
- in the event that a CHP Property or CHP itself is subject to an acquisition by a third party, that third party and its professional advisers;
- in the event that you have instructed or authorised us to disclose your personal information to a third party (e.g. a referee), that third party;
- law enforcement and government agencies, in order to comply with its legal and regulatory obligations, protect its legal rights and interests and respond to a subpoena, warrant or a lawful request for information; and
- other third parties, as necessary for the above purposes or as otherwise required or permitted by law.

Does CHP disclose information outside Australia?

As at the "Last updated" date of this Privacy Policy (see below), CHP does not normally disclose personal information to recipients outside of Australia.

How does CHP protect personal information?

CHP implements reasonable measures to protect personal information from loss, misuse or unauthorised access, disclosure or modification. We store personal information in data centres located in Australia.

CHP is not able to guarantee the security of personal information which you transmit to us over the internet, as the internet is inherently insecure. You transmit personal information to us over the internet at your own risk. You should immediately inform CHP if you know or suspect that your personal information has been subject to any breach of security or unauthorised activity.

To the maximum extent permitted by law, we exclude all liability (including in negligence) for the consequences of any unauthorised access to, modification of, disclosure of, misuse of or loss or corruption of any personal information. Nothing in this Privacy Policy restricts, excludes or modifies or purports to restrict, exclude or modify any statutory consumer rights under any applicable law, including the *Competition and Consumer Act 2010* (Cth), or any liability which cannot be excluded due to the operation of statute.

How can I access and correct my personal information?

You can make a request to access or correct your personal information using the details set out under "Contact us" below. In accordance with applicable legal requirements and subject to applicable exceptions under the Privacy Act, CHP will provide you with access to, or will correct, your personal information.

In limited circumstances CHP may charge a fee to provide you with access to the requested information. CHP will provide you with notice of any such fee in advance.

What is the process for complaining about a breach of privacy?

Please contact CHP in writing using the details set out under "Contact us" below if you have any queries or complaints regarding how we collect, use, disclose or handle your personal information under this Privacy Policy.

CHP will investigate any complaint and you will be notified of the outcome of the complaint as soon as reasonably practical.

Changes to this Privacy Policy

CHP may change this Privacy Policy to reflect changes to its legal and regulatory obligations, the manner in which CHP conducts its business or other matters which may affect the handling of personal information. Any such changes will be reflected in an updated Privacy Policy which CHP will publish on this webpage.

By continuing to access and use CHP's websites, or continuing your relationship with CHP, after publication of the updated Privacy Policy you are deemed to have understood and accepted any published changes to the Privacy Policy.

Contact us

CHP Management Pty Ltd
Attention: Charles Hunt
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Hawthorn, VIC 3122
charles@chpmanagement.com.au

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