

# Privacy Policy

AD Group (Australia) Holdings Pty Ltd PRIVACY POLICY

## 1. GENERAL

(a) The products and services are provided, and the [www.showcase.space](http://www.showcase.space) website (site) is operated by AD Group (Australia) Holdings Pty Ltd (ACN 658 740 857) (we,us or our).

(b) We are committed to protecting your personal information in accordance with the Australian Privacy Principles set out in the Privacy Act 1988 (Cth)(Privacy Act) and the General Data Protection Regulation (EU 2016/679) (GDPR), which applies across the European Union (collectively, Privacy Laws). Your privacy is very important to us and we are very careful about how and when your personal information is collected, processed, stored, altered, used, shared or destroyed.

(c) By using, browsing or accessing the site or by signing up online as a customer, you indicate that you have read, understood and accept this Privacy Policy and you agree to abide by it. Access to our products, services or site is conditional on your approval of this Privacy Policy and you agree that your use of our products, services or site implies your consent to the terms of this Privacy Policy.

(d) We do not wish to collect information about visitors which is sensitive information as defined under the relevant Privacy Laws. However, some of our services are automated and we may not recognise that you have accidentally provided us with sensitive information. If you have accidentally sent us sensitive information, please contact us using the details below.

(e) This Privacy Policy applies in general terms to the collection, processing, storage, use and disclosure by us of your personal information and how you may access personal information that we keep or complain about a suspected privacy breach.

## 2. WHAT PERSONAL INFORMATION DO WE COLLECT?

(a) Personal Information is information or an opinion about an identified individual or an individual who is reasonably identifiable, whether or not the information is true or recorded in a material form.

(b) This may include your:

(i) full name;

(ii) date of birth;

(iii) gender;

(iv) contact details, such as address, mobile and telephone number and email address;

(v) information about the products or services you have used, ordered, purchased, subscribed to or enquired about;

(vi) information from enquiries or communications you have made with us (which may include occupation and salary details);

(vii) the content of your enquiries or any communications between us;

(viii) billing information (such as credit card and bank account details);

(ix) method of payment;

(x) information about your interest in property, the property market, property values, property investment and the First Home Owner grant, including your intention to

purchase, finance details and property requirements, such as the location, size and configuration, and price range; and

(xi) information about your interest in property, the property market, property values, property investment and the First Home Owner grant, including your intention to purchase, finance details and property requirements, such as the location, size and configuration, and price range; and

(xii) any other Personal Information provided by you to us when making an enquiry or subscribing to our services and/or site or through surveys, competition forms, at special events and other promotional activities.

(c) We collect and use personal information from customers, users, authorised contacts, account holders or visitors of our site, and any other individual that interacts with us. The type of Personal Information that we collect and use depends on the type of dealings that you have with us.:

### 3. COLLECTING YOUR PERSONAL INFORMATION

#### 3.1 Methods of collection

(a) We will collect Personal Information about you in a variety of ways, including:

(i) through your use, or orders of, of our products and services (and our records thereof);

(ii) when you visit our site or submit information through our site, contact us, including in relation to a query or request information about products and services, complete any forms or agreements for our products or services, participate in surveys, competitions or promotional events;

(iii) from third parties (including our related bodies corporate (as defined in the Corporations Act 2001 (Cth)), business partners and service providers, credit reporting bodies and government agencies); and

(iv) from publicly available sources of information, such as if you use our social media sites or applications, pages or plugins.

(b) We do not use or share Personal Information for any purpose other than for the purpose for which it was collected.

(c) We will only collect Personal Information that is necessary for one or more of our functions or for a purpose outlined in this Privacy Policy or otherwise disclosed to you.

(d) The Personal Information collected by us will track your use, or enhance your use, of the foregoing and assist us in providing a better service.

### 3.2 Collection from you

(a) When we collect Personal Information directly from you, we will take reasonable steps to notify you (using a collection notice) at, before, or as soon as practicable after, the time of collection.

(b) As a collection notice is specific to a particular collection of Personal Information, it will provide more specific information about our information-handling practices than this Privacy Policy.

(c) This Privacy Policy is subject to any specific provisions contained in our collection notices and the terms and conditions of any offers, products and services. We therefore encourage you to read those provisions carefully.

### 3.3 Collection from an authorised representative

(a) If we collect your Personal Information from someone else (as your authorised representative), we will take reasonable steps to make sure you are aware of the collection.

(b) If you provide us with Personal Information about another individual (as their authorised representative), we rely on you to:

(i) inform them that you are providing their Personal Information to us; and

(ii) advise them that we can be contacted for further information.

(c) You must take reasonable steps to ensure the individual concerned is aware of and consents to the various matters detailed in this Privacy Policy, including the fact that their Personal Information is being collected, the purposes for which that information is being collected, the intended recipients of that information, the individual's right to obtain access to that information, our identity, and how to contact us.

(d) Where requested to do so by us, you must also assist us with any requests by the individual to access or update the Personal Information you have collected from them and provided to us.

#### 4. LEGAL BASIS FOR PROCESSING PERSONAL INFORMATION (EU ONLY)

We rely on several legal bases under the GDPR to collect, process, store, use and disclose the Personal Information of individuals residing in the European Union (EU), including:

(a) where you have freely and expressly consented to the collection, use, storage, processing and disclosure of your Personal Information for a specific purpose. The provision of Personal Information to us is voluntary. However, if you do not provide your Personal Information to us, we may not be able to provide you with access to, and use of, our products, services or site. You may withdraw your consent at any time by contacting us using the details below;

(b) where the collection, use, storage, processing and disclosure of your Personal Information is necessary for the performance of a contract to which you are a party. For example, when collection and use is necessary to fulfil our obligations to provide you with access to, and use of, our products, services or site;

(c) for our legitimate business interests, including:

(i) providing, operating and improving our products, services or site;

(ii) marketing new promotions, deals, offers, competitions, products, services provided by us or our Authorised Affiliates that we consider may interest or benefit you;

(iii) managing, analysing, understanding and developing our relationship with you; and

(iv) responding to your queries or complaints; and

(d) where there is a legal obligation to collect, use, store, process or disclose your Personal Information. For example, we may be obliged to disclose your Personal Information by reason of any law, regulation or court order and/or to protect our interests and legal rights.

## 5. USE OF YOUR PERSONAL INFORMATION

(a) We use, process and disclose your Personal Information for the purposes for which the information is collected.

(b) We may also use your Personal Information to:

(i) provide or deliver our products, services and site to you (or those of our related entities, (as defined in the Corporations Act 2001 (Cth)));

(ii) administer, improve, develop and manage our products, services and site (including maintaining, testing and upgrading our site and systems);

(iii) inform you about our site, products, services, offers, competitions, promotions, questionnaires, surveys, opportunities or other matters which we believe are of interest to you;

(iv) charge and bill you for the use of our products and services;

(v) customise the advertising and content on our site and to contact you about specials deals;

(vi) provide offers or information we think may be of interest or benefit to you, including information about the site, offers, competitions, promotions, events and surveys;

(vii) share with Third Parties;

(viii) verify your identity;

(ix) conduct creditworthiness and fraud checks;

(x) perform research and analysis;

(xi) to comply with regulatory or other legal requirements;

(xii) for any purpose to which you have consented; and

(xiii) for any other purpose notified to you at the time of collection.

## 6. USE BY THIRD PARTIES

## 6.1 Disclosure to Third Parties

(a) We may disclose your Personal Information to the following recipients:

(i) our employees, related entities (as defined in the Corporations Act 2001 (Cth)), business partners, third party contractors, suppliers and agents (Authorised Affiliates) from time to time for the purpose of delivering, providing and administering products, services or websites;

(ii) third-party service providers who process or use your Personal Information or the purpose of performing functions on our behalf, but may not process or use such information for any other purpose. Examples of these third-party service providers include, but are not limited to, marketing and analysis organisations, financial and credit card institutions in order to process any payments, hosting companies, web developers, internet service providers, telecommunication providers, customer service providers, customer support specialists, fulfilment companies, external business advisors (such as auditors and lawyers), research and data analysis firms, debt collectors and insurers (Third Party Data Processers); and

(iii) third-party advertising and commercial partners specified in section 9 below (Partners) for direct marketing purposes (see section 10 below),

(collectively, Third Parties).

## 6.2 Third Party disclosure to us

(a) Third Parties may provide us with Personal Information collected from you.

(b) If you disclose Personal Information to a Third Party, we rely on you to provide the Third Party with consent for us to collect, store, use, process or disclose your Personal Information.



### 6.3 Disclaimer

(a) We will not disclose your Personal Information to any Third Party (other than our Authorised Affiliates) without your written consent, unless:

(i) we are otherwise required by the relevant Privacy Laws;

(ii) we are permitted to under this Privacy Policy; or

(iii) such disclosure is, in our opinion, reasonably necessary to protect our rights or property, avoid injury to any person or ensure the proper functioning of the Site.

(b) This Privacy Policy only covers the use and disclosure of information we collect from you. The use of your personal information by any third party is governed by their privacy policies and is not within our control.

(c) If we collect any information that is not referred to or contemplated in this Privacy Policy, we will give you notification of the collection at the time that we or one of our services collects the information.

### 7. OVERSEAS DISCLOSURE

(a) Our Third Parties may be located both in and outside Australia and the EU. In particular, as at the date this Privacy Policy was most recently updated, your Personal Information may be disclosed to recipients in the United States, Australia, Singapore, China, Hong Kong and Malaysia and other countries from time to time (each, an Overseas Recipient), whose laws are not recognised by the European Commission as providing an adequate level of protection to Personal Information.

(b) Where we do transfer your Personal Information to Overseas Recipients, we take steps reasonably necessary to ensure that:

(i) there is a legal basis for the transfer of your Personal Information; and

(ii) your Personal Information is treated securely (including, using reasonable endeavours to ensure that each Overseas Recipient receiving your Personal Information are bound by Standard Contractual Clauses approved by the European Commission, which can be found at

[http://ec.europa.eu/justice/data-protection/international-transfers/transfer/index\\_en.htm](http://ec.europa.eu/justice/data-protection/international-transfers/transfer/index_en.htm) ).

(c) By accessing or using our products, services or Site, or providing your Personal Information to us, you explicitly and freely consent to the transfer of your Personal Information to Overseas Recipients. If you subsequently decide that you do not wish to receive information from Overseas Recipients you may let us know by contact us using the details below.

## 8. STORAGE AND SECURITY OF YOUR PERSONAL INFORMATION

### 8.1 Protecting your Personal Information

(a) Your Personal Information may be stored in storage facilities (owned and operated either by ourselves or our services providers) in hard copy or electronic format. We will use our reasonable endeavours to store your Personal Information securely and to make our sites and storage facilities as secure as possible against unauthorised access.

(b) We will use our reasonable endeavours to protect and maintain the security of your Personal Information. Our officers, employees, agents and third party contractors are expected to observe the confidentiality of your Personal Information and, where possible, we endeavour to procure that our Third Parties take reasonable steps to:

(i) protect and maintain the security of your Personal Information; and

(ii) comply with the relevant APPs when accessing and using your Personal Information.

## 8.2 No guarantee

The transmission of information via the internet is not completely secure. Despite our reasonable endeavours, we are unable to ensure or warrant the security of any Personal Information transmitted to us. Accordingly, all Personal Information disclosed by you to us is at your own risk and we are not liable for any unauthorised access to and disclosures of the Personal Information.

## 8.3 Destruction of Personal Information

(a) We will take reasonable steps to destroy or de-identify Personal Information where it is no longer required for any purpose, unless we are required or authorised by a relevant Privacy Law or a court or tribunal to retain the information.

(b) The Personal Information you provide to us will be stored by us for no longer than legally required following your Information request or following the closure of your account. To ensure we do not keep your Personal Information for longer than necessary, we consider several criteria, including:

(i) legal or regulatory obligations in relation to your personal information (eg financial reporting obligations);

(ii) whether we have an ongoing relationship (eg you have an account with us or our brands, you receive ongoing marketing communications or regularly visit or use our products, services or Site);

(iii) any specific requests you have made regarding the deletion of your personal information; and

(iv) our legitimate business interests (eg defending claims, statistical analysis or research).

## 8.4 Suspected data security breach

(a) We have a comprehensive data breach notification policy and response plan (Response Plan), which outlines the steps our personnel are required to take in the event of a data breach. This allows us to identify and deal with a data breach quickly to mitigate any harm that may result.

(b) As part of the Response Plan, we will notify you as soon as practicable if we:

(i) discover or suspect that your Personal Information has been lost, accessed by, or disclosed to, any unauthorised person or in any unauthorised manner;

(ii) believe that you are likely to suffer serious harm as a result; and

(iii) are unable to prevent the likely risk of harm.

(c) If you would like more information about our Response Plan, please contact us using the details below.

## 9. DISCLOSURE OF PERSONAL INFORMATION

### 9.1 Disclosure to Partners

We may disclose any information, including Personal Information, to any of our Partners, who may include:

(a) real estate agents, property developers, buyer advocates and agents, builders, property consortiums and owners corporations that have listings or advertising on our site and which you have requested information from, by submitting an enquiry or when you visit our site; or

(b) third party providers of goods or services to the real estate or property industry with whom we have commercial relationship, such as:

(i) ApartmentConcierge.com.au Pty Ltd (ACN 623 819 581) and Developments ID Pty Ltd (ACN 610 919 090), for the purpose of us or those third parties providing you with details of offers, goods or services that may be of interest to you;

(ii) a credit provider or financial institution, for the purpose of providing financial products or services that may be of interest to you; and

(iii) utilities providers, for the purpose of providing gas, electricity, telecommunications and internet products and services that may be of interest to you.

## 9.2 Disclosure to law enforcement

We may also disclose your Personal Information to law enforcement bodies or regulatory authorities to assist with their functions, courts of law or as otherwise required or authorised by relevant Privacy Laws.

## 9.3 Merger and acquisition

In the event of a merger, acquisition or sale of the whole or part of our business or assets, we reserve the right to transfer your Personal Information as part of any such transaction.

However, your Personal Information would remain subject to this Privacy Policy.

## 10. DIRECT MARKETING

### 10.1 Your consent

(a) At the time of accessing, or using, our products, services, site or otherwise from time to time, we may seek your express consent for us or our Partners to send you marketing or promotional materials and other information.

(b) Where we have obtained your prior consent or are otherwise permitted under the GDPR, we may, from time to time:

(i) use your Personal Information to send you information about the promotions, deals, competitions, products or services we offer, and any other information that we consider may be relevant to you; and

(ii) disclose your Personal Information to a specified Partner for the purpose of that Partner contacting you for promotional or marketing purposes. For example, a specified Partner may send you information about special deals, products or services they offer and other information that may interest you.

(c) Subject to clause 10.3, these communications may continue, even after you stop using our products or services.

## 10.2 Communication channels

(a) We or our Partners may send this information to you via the communication channels specified at the time you provide your consent.

(b) These communication channels may include mail, email, SMS telephone, social media or by customising online content and displaying advertising on our site.

## 10.3 Opting-out

(a) You can unsubscribe or opt-out from receiving marketing or promotional materials at any time by:

(i) emailing us at support@ad-group.com.au; or

(ii) using the unsubscribe facility included in our commercial electronic messages (ie email or SMS).

(b) If you have subscribed to receiving marketing or promotional materials relating to [DevelopmentConcierge](#), [Development ID](#), [Apartments&Developments](#) (being related entities), opting out of receiving Showcase related communications does not necessarily mean you have opted out of receiving communications relating to those websites (or their products or services). Please visit those website(s) (as applicable) to unsubscribe to those communications, or otherwise activate the appropriate unsubscribe function using the unsubscribe facility included in our commercial electronic messages (ie email or SMS).

(c) You may re-subscribe at any time by re-registering.

## 11. LINKS TO OTHER SITES FROM OUR SITE

(a) Although our site may contain hyperlinks or banner advertising to or from external websites, those websites are not subject to our privacy standards, policies and procedures. We recommend that you make your own enquiries as to the Privacy Policies of these third parties. We do not endorse any of these third parties, their products or services, or the content on their websites.

(b) We are in no way responsible for the privacy practices of these third parties.

(c) This Privacy Policy only addresses the use and disclosure of information we collect from you via our site, via our account establishment process or as otherwise permitted in this Privacy Policy. The use of your Personal Information by the aforementioned third parties is governed by the privacy policies of such parties and is not subject to our control.

## 12. COOKIES AND IP ADDRESSES

(a) We may collect information when you access and use our site by utilising features and technologies of your internet browser, including cookies and similar technologies. A cookie is a piece of data that enables us to track and target your preferences. We may use cookies to:

(i) enable us to identify you as a return user;

(ii) personalise and enhance your experience and your use of our site; and

(iii) improve our service to you when you access our site and to ensure that our site remains easy to use and navigate.

(b) Most browsers are initially set up to accept cookies. You can reset your browser to refuse all cookies or to warn you before accepting cookies. If you have set your browser to warn you before accepting cookies, you will receive the warning message with each cookie. If you reject our cookies, you may still use our site, but you may be limited in the use of some of the features and this may affect the functionality of our site.

(c) We may also use IP addresses to analyse trends, administer our sites, track traffic patterns, and gather demographic information for aggregated use.

## 13. YOUR RIGHTS IN RELATION TO PRIVACY

### 13.1 Privacy rights (EU only)

(a) Under the GDPR, you have a number of important rights. We must ensure your information is:

(i) processed lawfully, fairly and transparently;

(ii) collected for specified, explicit and legitimate purposes (and processed accordingly);



(iii) adequate, relevant and limited to what is necessary for purpose;

(iv) accurate;

(v) stored in a minimal way; and

(vi) processed to erase your Personal Information in ensure integrity and confidentiality.

(b) Subject to certain exceptions, you have the following rights:

Right	Detail
Right of access	This Privacy Policy explains what information we collect and process, why and when, we collect your information as well as how we collect, hold, use and disclose your Information. You have the right to request copies of your information.
Right to have your information processed lawfully	We must process your data lawfully. Processing of your data is only lawful if:  <ol style="list-style-type: none"><li>1. consent has been given;</li><li>2. processing is necessary for the performance of a contract;</li><li>3. processing is necessary to satisfy legal obligations; or</li><li>4. if one of the other conditions in this Article is satisfied.</li></ol>

Right to know our details

You have the right to know our information before we collect your information. We are required to provide you with the following details:

1. our identity and contact details;
2. purpose and legal basis for processing data;
3. recipients of data; and
4. any transfers outside of EU;
5. length of time of storage of data;
6. that you have the right to request access to, rectification of, erasure or transfer of data;
7. that you have the right to withdraw consent;
8. the existence of any automated decision-making. If you already have this information, we are not required to provide it to you again.

Right to transparency	<p>We are required to provide you with information that is:</p> <ol style="list-style-type: none"><li>1. concise, transparent, intelligible and in an easily accessible form;</li><li>2. in an intelligible and easily accessible form;</li><li>3. in clear and plain language. You have the right to withdraw your consent at any time, and you must be informed of this prior to providing consent.</li></ol>
Right to consent	<p>We must be able to demonstrate that you have given us consent. Your consent must be given in a way that is:</p> <ol style="list-style-type: none"><li>1. concise, transparent, intelligible and in an easily accessible form;</li><li>2. in clear and plain language; and</li><li>3. in writing, including electronically where appropriate.</li></ol>
Right to child consent	<p>If you are under the age of 16, consent must be given on your behalf by someone who holds parental responsibility.</p>

Right to rectification	You have the right to request that we correct any information we hold about you that is inaccurate or incomplete.
Right of erasure	You have the right to request that we erase your information in certain situations.
Right to restrict processing	You have the right to request that we restrict our collection, use, processing or disclosure of your Information in certain circumstances.

Right to object to processing

You have the right to:

1. object to decisions being made by automated means which produce legal effects concerning you or significantly affecting you; an
2. object or withdraw your consent at any time to the collection, use, processing or disclosure of your Information (including for direct marketing purposes), but this does not:
  1. apply where we have other legal justifications to continue to collect, use, or process or disclose your information; or
  2. affect the lawfulness of any collection, use, processing or disclosure of your Information in certain circumstances.

Right of data portability	You have the right to obtain a copy of your information in a commonly used electronic format so that you can manage, share and move it. You also have the right to request we send it to a third party.
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(c) You can exercise any of these rights by contacting us using the details below.

(d) We also have further obligations to you under the GDPR in relation to how we look after and treat your Information. You can find further details [here](#).

### 13.2 Access rights

(a) We will use our reasonable endeavours to keep your Personal Information that we collect accurate, up-to-date and complete.

(b) Subject to some exceptions provided by law, you have the right to access your Personal Information.

(c) You may access or request that we correct Personal Information which we have collected about you, by making a request in writing using the contact details below. Proof of identity may be required before such information will be provided or corrected.

(d) If we do not allow you access to any part of the Personal Information we hold about you, we will tell you why.

(e) We will not charge you for requesting to access your Personal Information, but we may charge you for our reasonable costs in supplying you with access to this information.

(f) We will endeavour to respond to your request for access or correction within 1 month from your request.

#### 14. CHILDREN'S POLICY

(a) We do not knowingly seek, collect or process Personal Information from or about persons under the age of 16 years of age (Children) without the consent of a parent or guardian.

(b) If we become aware that any Personal Information relating to a Child has been provided without the consent of a parent or guardian, we will use reasonable endeavours to:

(i) delete the Personal Information from all relevant files as soon as possible; or

(ii) ensure, where deletion is not possible, the Information Personal Information is not used further for any purpose or disclosed further to any Third Parties.

(c) Any parent or guardian with queries regarding our collection, use, processing or disclosure of Personal Information relating to their Child should contact us using the details below.

#### 15. CONSENT

You expressly and freely acknowledge and agree that we, our Third Parties and each of their officers, employees, agents and contractors are permitted to collect, process, use, share, store, disclose, alter and destroy your Personal Information in the manner set out in this Privacy Policy and in accordance with the Privacy Laws.

#### 16. CHANGES TO THE PRIVACY POLICY

(a) We are committed to:

(i) clearly expressing our Privacy Policy and keeping it up to date; and

(ii) making sure we take reasonable steps to implement and the practices, procedures and systems to ensure we comply with all the relevant Privacy Laws.

(b) Accordingly, we may amend this Privacy Policy from time to time at our discretion.

(c) Any revised version of this Privacy Policy will be posted on our site, effective from the time of posting. A copy may also be requested from our Privacy Officer.

(d) Your continued use of our products, services or site following any such amendment will be confirmation of your acceptance of the amendments. We reserve the right to modify this Privacy Policy at any time, so please review it frequently.

## 17. HOW TO CONTACT US

If you would like to request to access or correct Personal Information we hold about you, or to opt-out of receiving any promotional communications from us or our Partners, please contact our Privacy Officer at [support@ad-group.com.au](mailto:support@ad-group.com.au).

## 18. RESOLVING YOUR PRIVACY ISSUES

(a) If there are any queries, issues or complaints you wish to raise with us regarding the way we have handled your Personal Information, or this Privacy Policy, please contact our Privacy Officer directly in writing to the email specified in section 17.

(b) When making a privacy complaint please provide our Privacy Officer with full details of your complaint and any supporting documentation.

(c) At all times, privacy complaints:

(i) will be treated seriously;



(ii) will be dealt with promptly;

(iii) will be dealt with in a confidential manner; and

(iv) will not affect your existing obligations or your commercial arrangements with us.

(d) Our Privacy Officer will endeavour to:

(i) provide an initial response to your query or complaint within 15 business days; and

(ii) investigate and attempt to resolve your query or complaint within 30 business days or such longer period as is necessary and notified to you by our Privacy Officer.

(e) If you are dissatisfied with the outcome of your complaint, you may refer the complaint to:

(i) the Australian Information Commissioner who may be contacted at <https://www.oaic.gov.au/individuals/how-do-i-make-a-privacy-complaint>; or

(ii) the supervisory authority in the relevant EU member state.

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