



## Privacy Policy – Daiwa House Australia Pty Ltd

### 1 General

- (1) This Privacy Policy ("**Policy**"):
  - (a) explains how Daiwa House Australia Pty Ltd (ABN 90 169 473 241) and its related entities ("we", "our" or "us") collects, stores, uses, discloses and manages your personal information; and
  - (b) governs your use of our websites, applications and free Wi-Fi access (**Sites**) and your use of our products and services.
- (2) Please read this Policy carefully as by using our Sites and/or products and services and by providing your personal information to us:
  - (a) you are confirming that you have read this Policy and understand how your personal information will be handled by us; and
  - (b) you consent to us collecting, using, storing, disclosing and managing your personal information in accordance with the *Privacy Act 1988* (Cth) ("**Privacy Act**"), the Australian Privacy Principles ("**APP's**") (to the extent that we are required to comply with the Privacy Act and the APP's) and this Policy.

### 2 How do we collect personal information?

- (1) In this Policy, "personal information" has the meaning given to it in the Privacy Act and includes any information or opinion, whether true or not, about an identified individual or an individual who is reasonably identifiable.
- (2) The types of personal information we collect depends on the nature of your interactions with us, but includes:
  - (a) personal information you voluntarily supply to us as a result of:
    - (i) accessing our Sites;
    - (ii) accessing our products and services; and
    - (iii) business dealings with us, potential and actual, current and historical.
    - (iv) employment
  - (b) tracking information we collect as you navigate through accessing our Sites (e.g. the use of Cookies).
- (3) We will generally collect personal information from you:
  - (a) directly, when you communicate with us;



- (b) indirectly, anytime you communicate or interact with us, whether by phone, email, face to face meetings, online, via our Sites or by social media;
  - (c) when you access our Sites;
  - (d) when you engage in business dealings with us, potential or actual, current and historical; and
  - (e) from your participation in our market research, surveys, competitions, loyalty programs or promotions.
- (4) We may also collect your personal information from third parties such as:
- (a) marketing agencies, data collection and research organisations;
  - (b) medical professionals if you are involved in an accident or incident at any of our office locations; and
  - (c) credit reporting bodies, law enforcement and government entities.

### **3 What personal information do we collect?**

- (1) We collect the types of personal information required to assist us in providing and operating our Sites as well as providing our products and services to you, including fulfilling any functions and activities with respect to your use of our Sites and your use of our products and services including when engaging in business dealings with you, potential or actual, current and historical.
- (2) This includes, but is not limited to, the following types of personal information:
  - (a) Information that identifies you (for example, name, gender, address, contact details (e.g. phone number, email etc.) and date of birth.
  - (b) Financial information including bank accounts, credit card details, your income and creditworthiness.
  - (c) Information to assist our relationship management and market research functions, which may include information relating to your interests, experiences and preferences.
  - (d) Your device ID, device type, geo-location information, IP address, browsing information and any personal information that you may provide to us directly or indirectly via accessing our Sites.
  - (e) Any other personal information that you provide to us that may be required in order to facilitate your dealings with us.
- (3) We endeavour to collect personal information about an individual only from that individual. However, in some circumstances we may obtain personal information from a third party or may be required to verify details against records kept by other parties.
- (4) If you provide personal information about another person to us, we require that you inform that person that you intend or have so provided their personal information to us as well as provide them with a copy of this Privacy Policy.

#### **4 How do we use your personal information and who may we disclose it to?**

- (1) We may collect, hold, use and disclose your personal information for the following primary purposes:
  - (a) For the purposes for which it is collected.
  - (b) To provide and market our products and services to you (including by disclosing your personal information to third party service providers to market to you on our behalf).
  - (c) To administer our relationship with you by communicating with you and providing you with information about our products and services and our Sites that may be of interest to you.
  - (d) To do business with you.
  - (e) For the general management and conduct of our business, products and services, including improving our business and managing and enhancing our products and services.
  - (f) To comply with our legal obligations.
  - (g) To investigate incidents (including potential incidents) which occur on or at our premises.
  - (h) For security and risk management purposes.
  - (i) To help us provide, manage, develop and enhance our products and services and our Sites (including informing you about our products and services and our Sites, personalising and customising your experience on our Sites and being able to fulfil our functions and activities with respect to your use of our products and services and our Sites).
- (2) We may use and disclose your personal information for secondary purposes related to the primary purposes set out above.
- (3) We may also use and disclose your personal information to governmental or regulatory authorities if we are served with a request to disclose your personal information and in any event will notify you if we receive such a request.
- (4) Otherwise, we will not disclose your personal information to any third party or use your personal information for any purpose unless we have obtained your prior written consent or if we are otherwise permitted to do so by law.
- (5) By disclosing your personal information to us, you consent to us using it to:
  - (a) provide you with full and proper access of our Sites and our products and services and to fulfil our functions and activities with respect to your access of our Sites, products and services;
  - (b) administer our relationship with you;
  - (c) monitor activity on our Sites;
  - (d) market, improve and add to our Sites, our products and services (including through third party service providers acting on our behalf);

- (e) respond to a serious threat to an individual's life or to public health or safety;
- (f) respond to suspected unlawful activity; or
- (g) where required or authorised by law.

## **5 Can you remain anonymous or withhold personal information?**

Where practical, you may choose not to identify yourself and deal with us on an anonymous basis or use a pseudonym. However if you do not provide us with required personal information we may not be able to provide you with access to some or all of our Sites, our products and services.

## **6 Will you receive direct marketing?**

- (1) We and/or our third-party service providers may send you direct marketing and promotional communications and information about:
  - (a) products, services, discounts, competitions and special promotions that we consider may be of interest to you;
  - (b) offers or promotions based on how you use our products and services; and
  - (c) third party products and services (including offers and discounts we may have negotiated for our customers) we think may be of interest to you.
- (2) These communications may be sent in various forms, including by telephone, post, fax, email, SMS or any other form of electronic communication, in accordance with the Privacy Act and the *Spam Act 2003* (Cth).
- (3) By providing us your personal information you consent to us and/or third party service providers we engage, sending you the direct marketing messages described above.
- (4) Our direct marketing messages and materials will contain a prominent statement (including, for electronic messages, an unsubscribe function) allowing you to unsubscribe from receiving direct marketing communications at any time.
- (5) You may therefore opt-out of any or all, direct marketing communications at any time by using the unsubscribe function or by contacting us directly.
- (6) If we are providing products and services to you, we may still be required to make certain communications to you in connection with providing the products and services to you or as required by law, notwithstanding your unsubscribe request.

## **7 Will your personal information be disclosed overseas?**

- (1) We may disclose your personal information to the following overseas recipients:
  - (a) related parties;
  - (b) other companies, service providers and individuals who assist us in providing or performing services and functions such as hosting and data storage providers; and

- (c) where we are obligated by law to so disclose.
- (2) The countries in which the overseas recipients will be located are in Japan and in the United States.
- (3) We will take reasonable steps to ensure that any overseas recipient does not use the personal information for their own purposes and ensure that they adhere to the Privacy Act as well as the Terms of this Policy.

## **8 Cookies**

- (1) Cookies are pieces of information that a website transfers to your device to store and sometimes track information about your use of a Site. We use cookies to distinguish you from other users in order to better serve you when you revisit our Sites.
- (2) You can set your browser to notify you when you receive cookies, providing you with the opportunity to either accept or reject or modify the cookies. You can also refuse cookies by turning them off in your browser. However if you do this, certain parts of our Sites may not function properly and you may be restricted from accessing those parts of the Sites.
- (3) We handle personal information collected by cookies in the same way that we handle all other personal information as described in this Policy.

## **9 How do we store, protect and discard your personal information?**

- (1) We may hold your personal information in either electronic or hard copy form and use cloud storage and IT servers that may be located in and outside of Australia.
- (2) The confidentiality and security of your information is very important to us, and we take reasonable steps and precautions to protect your personal information from misuse, interference and loss, as well as unauthorised access, modification or disclosure.
- (3) We use a number of physical, administrative, personnel and technical measures to protect your personal information, and regularly test our security controls, however the open nature of the internet means there is always some risk that an unauthorised party might find ways to overcome our security measures, and hence it is not possible to guarantee the security of your personal information in such unforeseen circumstances.
- (4) You should also be aware that e-mail communications are not usually encrypted and should not be considered secure.
- (5) Where required by applicable law, we will notify you, and the Office of the Australian Information Commissioner and/or other relevant regulatory authorities, of data breaches affecting your personal information.
- (6) Where we no longer require your personal information, we will take reasonable steps to destroy or de-identify it.

## **10 Links to other websites**

- (1) Our Sites may contain links to websites owned and operated by other organisations. When you click on one of those links, you are moving to another website.

- (2) Unless stated otherwise, we are not responsible for the privacy practices of, or any content on, those linked websites.
- (3) We encourage you to read the privacy policies and other terms that apply to those websites as they may differ from this Policy, and if you have any privacy concerns, we encourage you to contact those website providers directly.

## **11 How can you access and correct your personal information?**

- (1) You generally have the right to access your personal information free of charge, subject to some limitations contained in the Privacy Act.
- (2) If you wish to:
  - (a) seek access to your personal information
  - (b) correct your personal information;
  - (c) request that we delete all or some of your personal information; and/or
  - (d) submit a request not to have any further contact from us,please contact us.
- (3) Depending on the nature of your request, we may ask you to provide us further information in order to verify your identity and ask you to put in writing the information you require. It may therefore take a little time to process your application or to access and retrieve your personal information.
- (4) The APP sets out some circumstances in which we are not required to provide you with such access. If you ask for your personal information and any of those circumstances exist, you may be given access to the personal information in a way that is permitted under the Privacy Act. For the avoidance of any doubt, this includes our policies and procedures with respect to the release of CCTV footage, and which comply with the Privacy Act.
- (5) In the event that access and/or correction of your personal information is denied, we will inform you of the reasons for that denial.
- (6) Where permitted by law, we may recover reasonable expenses associated with providing you with access to your personal information.
- (7) We encourage you to update us with your accurate, current and complete information.

## **12 Will this Policy change?**

- (1) We may update and amend this Policy from time to time.
- (2) We encourage you to check this Policy periodically as amendments to the Policy will be effective immediately upon notification on our Sites.



### 13 Do you have complaints or concerns about the privacy of your personal information?

- (1) If you have a complaint in relation to the collection, use and/or disclosure of your personal information, please contact us via the details provided below.
  - (a) **Email:** [info@daiwahouse.com.au](mailto:info@daiwahouse.com.au)
  - (b) **Post Address:** Suite 502, 2 Elizabeth Plaza, North Sydney 2060 NSW
  - (c) **Phone:** +61 (0)2 8036 4550
- (2) Once we receive your request we will acknowledge receipt and will endeavour to respond to your request or complaint in writing within 30 days.
- (3) If you consider that we have been unable to satisfactorily resolve your concerns or have concerns about our handling of your personal information, then you can contact the Office of Australian Information Commissioner for further information:
  - (a) **Email:** [enquiries@oaic.com.au](mailto:enquiries@oaic.com.au)
  - (b) **Post Address:** Office of Australian Information Commissioner, GPO Box 5218, Sydney NSW 2000
  - (c) **Phone:** 1300 363 992
  - (d) **Website:** [www.oaic.gov.au](http://www.oaic.gov.au)

### 14 Changes to Daiwa Houses's Privacy Policy

We will update our Policy from time to time to take account of new laws and technology, including changes in our operations and business practises.

Effective Date: 1<sup>st</sup> September 2025