

## Privacy Policy

**Omni Living respects your privacy. The Privacy Statement applicable to this Website explains how personal data will be treated as you access and interact with this Website and can be accessed on the Privacy page of this website.**

This policy sets out how Omni Living and its related companies and trusts (“Omni Living”) collects, uses, discloses and manages your personal information and how Omni Living complies with the Privacy Act 1988 (Cth) (“Privacy Act”).

If you have any queries or complaints regarding your personal information, please contact our office using the contact details listed below.

### **What is your personal information?**

When used in this privacy policy, the term ‘personal information’ has the meaning given to it in the Act. In general terms, it is any information that can be used to personally identify you. This may include your name, address, telephone number, email address and profession or occupation. If the information Omni Living collects personally identifies you, or you are reasonably identifiable from it, the information will be considered to be personal information.

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

The information we collect about you depends on the products, services or information that you ask us to provide to you. We may collect information such as:

- your name, date of birth, gender and contact details including your, physical address, email address and telephone number;
- bank account and credit card details;
- information to verify your identity such as your driver’s licence number;
- information relating to your income and credit-worthiness;
- your employment history, if you apply for a job with us;
- details of products and services that we have supplied to, or you have enquired about, together with any additional information necessary to deliver those products and services and to respond to your enquiries;
- your preferences for particular products, services, facilities or lifestyle activities when you tell us what they are;
- information about you and your family and any characteristics, preferences or requirements that are relevant to the products and services that we may provide to you;
- information relating to your Omni Living account (including your password and username);
- any additional information relating to you that you provide to us directly through our websites or indirectly through use of our websites or online presence or otherwise. That information may include information regarding what web pages you access;
- information you provide to us through our representatives or customer surveys from time to time;
- if you invest through us, information relating to you and your investment;

- if you are involved in an incident, details about the involvement of you and other people in the incident, witness and incident statements, CCTV footage, medical information and information from medical consultants and other consultants and third parties.

## **Cookies**

A cookie is a small text file that a website may write to your hard drive when you visit the website. A cookie file can contain information, such as a userID, that the website uses to track the pages you have visited. The only personal information a cookie can contain is information you personally supply. A cookie cannot read data on your hard disk or read cookie files created by other websites.

Omni Livings websites use cookies to track user traffic patterns and to better serve you when you revisit the website. You can set your browser to notify you when you receive a cookie, providing you with the opportunity to either accept or reject it. You can also refuse all cookies by turning them off in your browser.

## **How is your personal information collected?**

Omni Living will collect your personal information directly from you unless it is unreasonable or impracticable to do so. When collecting personal information from you, we may collect it in ways including:

- through your access and use of our websites;
- through your enrolment and participation in surveys, questionnaires, customer loyalty programs, competitions and promotions run by or on behalf of Omni Living;
- during conversations between you and our representatives;
- when you make an enquiry, complete an application or purchase order; or
- in the case of incidents in which you are involved, from you, witnesses, CCTV footage, medical consultants and other consultants and third parties.

We may also collect personal information from third parties including from our related companies, third party companies including but not limited to, marketing agencies, credit reporting agencies, law enforcement agencies and other government entities.

## **What happens if Omni Living cannot collect your personal information?**

If you decide not to provide Omni Living with the personal information described above, some or all of the following may happen:

- Omni Living may not be able to provide the requested products or services to you, either to the same standard or at all;
- Omni Living may not be able to provide you with information about the products and services that you may want; or
- Omni Living may be unable to tailor the content of its websites to your preferences and your experience of the websites may not be as enjoyable or useful.

## **For what purposes does Omni Living collect, hold, use and disclose your personal information?**

Omni Living operates the following businesses:

- property development;
- investment in and leasing of commercial and industrial property;
- investment in and leasing of shopping centres;
- investment in residential property;
- investment in and leasing of retirement living property;
- real estate agent;
- mortgage broking and insurance; and
- unlisted property trust where it may make product offerings to potential investors.

Omni Living collects personal information in order to carry on the above businesses, to provide property-related products and services, to improve our products and services and to communicate with our customers and investors. Personal Information may also be disclosed between Omni Living's businesses, joint venture partners, related companies and trusts.

Omni Living also collects, holds, uses and discloses your personal information for the following purposes:

- to provide products and services to you and to send information and communications requested by you;
- to inform you of updates concerning Omni Living and its products and services;
- to provide you with access to protected areas of our websites;
- to assess the performance of the website and to improve its operation;
- to conduct business processing functions including providing personal information to our related bodies corporate, contractors, service providers or other third parties;
- for the administrative, marketing (including direct marketing), planning, product or service development, quality control or research purposes of Omni Living and its contractors and service providers;
- to provide your updated personal information to our contractors or service providers in order for us to provide our products and services to you;
- to update our records and keep your contact details up to date;
- to process and respond to any enquiry or complaint made by you;
- for risk management purposes including incident investigation, claims management and litigation; and
- to comply with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or in co-operation with any governmental authority of any country (or political sub-division of a country).

Your personal information will not be shared, sold, rented or disclosed other than as described in this policy.

## **Direct marketing communications**

Omni Living may send you direct marketing communications and information about:

- products, services, discounts, competitions and special promotions that we consider may be of interest to you;
- offers or promotions based on how you use our products and services;
- other companies' products and services (including offers and discounts we've specially negotiated for our customers) we think may interest you, if you've chosen to receive this information.

These communications may be sent in various forms, including by telephone, post, fax, email, SMS, Whatsapp or by other forms of electronic messages.

You consent to us sending you those direct marketing communications by any of those methods. If you indicate a preference for a method of communication, we will try to use that method whenever practical to do so.

In addition, at any time you may opt-out of receiving marketing communications from Omni Living by contacting us (see the details below) or by using any opt-out facilities provided in the marketing communications. If you opt-out using the opt-out details specified in a marketing communication, we will ensure that your name is removed from the mailing list that we used to send you that particular communication. If you wish to opt-out of other (or all) marketing communications or mailing lists, please see below.

### **How can you opt-out of other marketing communications?**

You can opt out if you prefer to not receive direct marketing communications about our latest products, services, promotions and offers. You may wish to opt-out of selected mailing lists or all Omni Living mailing lists.

In order to opt-out, please contact our Privacy Officer using the contact details below. Please note that, if Omni Living is currently providing you with services or products, Omni Living will still need to send you essential information about your account, the relevant services or products and other information required by law.

### **To whom does Omni Living disclose personal information?**

Omni Living does not disclose your personal information, except as stated below. Omni Living takes reasonable steps to ensure that third party recipients do not use personal information for their own purposes and that those parties comply with Omni Living privacy policy.

Parties to whom Omni Living may disclose relevant personal information include:

- consultants, agents or contractors acting on Omni Living's behalf, including real estate and travel agents, marketing agencies, surveyors, conveyancers, builders and property developers;
- valuers where Omni Living is seeking to value a property or lease;
- panel lenders, lenders mortgage insurers, credit reporting agencies, guarantors;
- regulatory authorities where required by law;

- related parties, entities and trusts of Omni Living; and
- parties to whom Omni Living has outsourced various functions. Those parties may include the providers of share registry services, catering and restaurant services, contractors or service providers for the purposes of operation of our website or our business, custodians, IT systems administrators, mailing houses, couriers, payment processors, data entry service providers, electronic network administrators, debt collectors, insurers, insurance brokers, real estate agents, marketing agents, travel agents, claims management services, injury management services, property management services and professional advisors such as accountants, lawyers and business advisors.

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If any Omni Living business, company or trust is sold to another organisation, we may transfer any personal information we hold about you to that organisation.

### **Security of Information**

No employee is able to access information they do not require for their duties. There are passwords and security access IDs in place to restrict access to confidential and personal information to those who need it perform their duties.

### **Access and correction of personal information**

If you wish to seek access to the personal information we may hold about you, please contact our office by sending a form from this website. Where we hold information that you are entitled to access, we will try to provide you with a suitable means of accessing it (for example, by mailing or emailing it to you).

There may be instances where we cannot grant you access to the personal information we hold. For example, we may need to refuse access if granting access would interfere with the privacy of others or it would result in a breach of confidentiality. If that happens we will give you written reasons for the refusal.

If you believe that personal information we hold about you is incorrect, incomplete or inaccurate, then you may request us to amend it. If you wish to update the personal information that Omni Living may hold, please complete the Change Details Request Form. In some unusual cases we may not agree that there are grounds for amending your personal information. If that happens, we will add a note to the personal information stating that you disagree with it.

We will not charge you for simply making the request and will not charge for making any corrections to your personal information. Depending on the nature of the request, we may ask you to verify your identity, put your request in writing and to complete an enquiry form, which will be sent to you.

You may contact our Privacy Officer by:

Email: [privacy@thirdigroup.com.au](mailto:privacy@thirdigroup.com.au); or

Post: Privacy Officer, Omni Living, 53 Hume Street Crows Nest NSW 2065

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

Omni Living requests that complaints about breaches of privacy be made in writing, so we can be sure about the details of the complaint. Our Privacy Officer deals with privacy complaints and any complaints should be directed to the Privacy Officer using the contact details above. We will attempt to confirm as appropriate and necessary with you your understanding of the conduct relevant to the complaint and what you expect as an outcome. We will inform you whether we will conduct an investigation, the name, title, and contact details of the investigating officer and the estimated completion date for the investigation process.

After Omni Living has completed its enquiries, we will contact you, usually in writing, to advise the outcome and invite a response to our conclusions about the complaint. If we receive a response from you, we will assess it and advise if Omni Living has changed its view. If you are unsatisfied with the outcome, Omni Living will advise you about further options including, if appropriate, review by the Privacy Commissioner within the Office of the Australian Information Commissioner.

## **Do we disclose your personal information outside Australia?**

We may disclose personal information to our related bodies corporate and third party suppliers and service providers located overseas for some of the purposes listed above. We take reasonable steps to ensure that the overseas recipients of your personal information do not breach the privacy obligations relating to your personal information. We may disclose personal information to entities outside Australia, including the following:

- our related bodies corporate, located in the China, Hong Kong and Singapore; and
- our data hosting and other IT service providers, located in India.

## **Security**

Omni Living takes all reasonable security measures to protect personal information from loss, unauthorised access, destruction, misuse, modification or disclosure.

## **Changes to Omni Living's privacy policy**

Omni Living reserves the right to modify or amend this privacy policy at any time and will update the privacy policy on Omni Living website if it has been changed. If you have any further questions about Omni Living privacy policy, please contact our office.