



## PRIVACY POLICY

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### 1 Background and purpose

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In Australia, privacy is regulated by the Privacy Act 1988, the Privacy Amendment (Enhancing Privacy Protection) Act 2012 and associated regulations (Privacy Laws). The Privacy Laws include the Australian Privacy Principles.

This policy has been adopted by Villa World Limited, and also applies to its related entities (we/us/our). We recognise the importance of your privacy, and this policy explains how we comply with the Privacy Laws when collecting, holding and using information about individuals.

### 2 Personal information

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Under the Privacy Laws, “personal information” is information or an opinion about an individual who is identified or is reasonably identifiable.

Personal information will be “sensitive information” if it relates to things such as an individual’s racial or ethnic origin, political opinions, religious or philosophical beliefs, membership of a trade union, sexual preferences or practices, criminal record or health information. Generally, we do not collect sensitive information, and will only do so with your consent.

Examples of information that may be collected include (but are not limited to) your name, physical address, email address, telephone number, date of birth, tax file number, financial position, credit history, your feedback about our products or services.

### 3 Why information is collected

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We will only collect information that is reasonably necessary for, or is directly related to, our activities or functions. We might collect personal information about you if you are an individual and:

- You have bought, or may be interested in buying, a house and/or land from us;
- You have applied to rent a property from us;
- You have applied to work for us;
- You supply products or services to us;
- You own securities in one of our entities; or
- You are otherwise interested in doing business with us or have contact with us.

### 4 How information is collected

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We will collect information directly from you in person, over the telephone, by email or through our websites. If it’s unreasonable or impractical to collect the information directly from you, we may collect it from third parties that you’re dealing with including selling agents, finance brokers and lawyers. In those cases, we will notify you if you may not be aware that the information has been collected.

### 5 Use of information

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Generally, we will use your personal information for one or more of the following reasons:

- providing services to you or someone else you know;
- processing an application you have made;
- acting as your agent if you request us to do so;
- undertaking various activities required by law;
- providing you with information about other services offered by us and other affiliated organisations, that may be of interest to you;
- providing you with promotional information about us and other affiliated organisations;
- facilitating our internal business operations, including the fulfillment of any legal requirements; and

## PRIVACY POLICY

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- analysing our services and customer needs with a view to developing new and/or improved products and services.

### 6 Disclosure of information

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Generally, we only use personal information for the purposes for which it was collected (as explained above). However, we may disclose personal information about you to:

- Service providers who assist us in operating our business. These service providers would enforce their own privacy policy and may not be required to comply with ours;
- Other service providers who provide the various services you have requested and we have arranged. These service providers would enforce their own privacy policy and may not be required to comply with ours;
- A purchaser of the assets and operations of our business, providing those assets and operations are purchased as a going concern;
- Corporate partners, business associates and other organisations we have strategic affiliations with, for the purposes of marketing their products and services to you where we consider these products and services may be of interest to you;
- Other carefully screened third parties whose products and services we consider may be of interest to you;
- Government and regulatory organisations, as required or authorised by law.

We shall only disclose your information to third parties where that party demonstrates the same level of commitment to your privacy as we do.

If you do not wish to receive direct marketing material from third parties, you are able to withdraw your consent at any time by notifying us in writing at the address below.

We are not likely to disclose personal information to overseas recipients, and will only do so for a permitted purpose and in accordance with the Privacy Laws.

### 7 Failure to provide information

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If the personal information you provide to us is incomplete and/or inaccurate, we may be unable to effectively provide our goods or services. However, you are not obliged to provide us with any personal information.

### 8 Internet users

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If you access our websites, we may collect additional personal information about you in the form of your IP (Internet Protocol) address and domain name.

Also, our websites use cookies. The main purpose of cookies is to identify users and to prepare customised web pages for them. Cookies do not identify you personally, but they may link back to a database record about you. We use cookies to monitor usage of our websites and to create a personal record of when you visit our websites and what pages you view so that we may serve you more effectively.

### 9 Security

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We store your personal information in different ways, including in paper and in electronic form. The security of your personal information is important to us. We take all reasonable measures to ensure that your personal information is stored safely to protect it from misuse, loss, unauthorised access, modification or disclosure, including electronic and physical security measures.

### 10 Access

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You may access the personal information we hold about you, upon making a written request. We will endeavour to provide you with access to the information requested within 30 days. We may charge you a reasonable fee for processing your request.

We may decline a request for access to personal information where the Privacy Laws require us to do so.



## PRIVACY POLICY

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If, upon receiving access to your personal information or at any other time, you believe the personal information we hold about you is inaccurate, incomplete or out of date, please notify us immediately. We will take reasonable steps to correct the information so that it is accurate, complete and up to date.

### **11 Links to other web sites**

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Our websites may contain links to other websites. We are not responsible for the privacy practices of linked web sites and so linked web sites are not subject to this policy or our privacy procedures.

### **12 Feedback**

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If you believe we have breached the Privacy Laws, or you have any other complaint, query or concern about this policy or the way in which we have handled your personal information, please contact us as follows:

Privacy Officer  
Villa World  
PO Box 1899  
BROADBEACH QLD 4218  
Email address: [info@villaworld.com.au](mailto:info@villaworld.com.au)  
Telephone: +61 07 5588 8888  
Facsimile: +61 07 5588 8800

We will investigate your complaint and provide you with a response, usually within 30 days. If you aren't satisfied with our response, you should contact the Office of the Australian Information Commissioner (OAIC).

### **More information**

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For more information about privacy in general, you can visit the website of OAIC at [www.oaic.gov.au](http://www.oaic.gov.au).

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