

Privacy Policy – Villa World Limited

1 Background and Purpose

Villa World Limited ACN 117 546 326 and its related entities (referred to as “Villa World”, “we” and “us”) recognise that the privacy of your personal information is important to you and are committed to protecting the privacy of any personal information we collect from you.

Villa World abides by the *Privacy Act 1988* (Cth) and the Australian Privacy Principles under the Privacy Act (**Privacy Laws**).

This Privacy Policy explains how we comply with Privacy Laws when collecting, using and disclosing your personal information. Unless you give us your consent to do otherwise, we will only collect, use and disclose your personal information in accordance with this Privacy Policy. By providing your personal information to us, you consent to its use and disclosure as set out below.

You can obtain information about Privacy Laws and your privacy rights at the website of the Office of the Australian Information Commissioner at www.oaic.gov.au/privacy-portal/.

2 Personal Information

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.

We collect personal information that is related to the conduct of our business, including (but not limited to):

- your name, physical address, email address, telephone number, date of birth;
- your financial position and credit history;
- information about your dealings with us, including your feedback about our products or services;

- details of your dealings in securities in Villa World entities; and
- other personal information that is contained in communications between you and us.

Where relevant we may ask you for other information, for example, qualifications and employment history if you are applying for employment with us as well as bank account, superannuation account details and a tax file number if you obtain employment with us.

3 What information is collected

We will only collect information that is reasonably necessary for, or is directly related to, our activities or functions, for example to provide you with a range of products and services, to meet our obligations to you as well as to enable us to conduct our business and improve and promote the products and services we provide. We might collect personal information about you if:

- 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 Villa World entities; or
- you are otherwise interested in doing business with us or having contact with us.

4 Failure to provide information

You are not obliged to provide us with any personal information. However, our ability to meet our obligations to you, your business, your employer, or to process any application may be adversely affected if you do not give us the requested personal information, or if the information you give us is incomplete or inaccurate.

POLICY:	Privacy Policy	
Policy authorised by:	CEO/Managing Director & CFO/Company Secretary	Date: 15 September 2015
Policy maintained by:	General Counsel	Current version: 2015/1

5 How information is collected

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 such as selling agents, finance brokers, lawyers, business associates, your employer or your personal associates. In those cases, we will notify you to inform you that the information has been collected. We may also collect personal information from publicly available resources.

We hold personal information in hard copy and electronic files.

Collection of information from the Villa World websites

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. This information is used for internal purposes only, including statistical purposes.

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. You may be able to change the settings of your browser so that cookies are not accepted generally or that you are provided with options to accept or reject them as they are sent to your browser. You might not be able to use the full functionality of our websites by refusing the use of cookies.

6 Use of information

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

- providing products or services to you or someone else you know;
- processing an application you have made, including for employment with us;
- acting as your agent if you request us to do so;

- undertaking various activities required by law;
- providing you with information about products or services offered by us and other affiliated organisations which 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
- analysing our services and customer needs with a view to developing new or improved products or services.

7 Disclosure of information

Generally, we only disclose 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 comply with 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 comply with 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 selected third parties whose products and services we consider may be of interest to you; and
- Government and regulatory organisations, as required or authorised by law.

Unless we are required to do so by law, we will only disclose your personal 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 Privacy Laws.

8 Security and accuracy

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, including electronic and physical security measures, to ensure that your personal information is stored safely to protect it from misuse, interference, loss, unauthorised access, modification or disclosure.

We will take reasonable steps to ensure that all personal information we hold is accurate, complete, up-to-date, relevant and not misleading.

If any of your details change, please let us know as soon as possible by using the contact details below so we can maintain the accuracy of your personal information.

9 Access and correction

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. There is no fee for making a request to access your personal information but we may charge you a reasonable fee for giving you access to your personal information in a mutually agreed format, usually by sighting the accessible information held on file.

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

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. If we refuse to correct your personal information as requested, we must:

- notify you in writing of the reasons for the refusal (unless it would be unreasonable to do so) and how to complain of the refusal; and
- upon request from you that we associate a statement that the information is inaccurate, incomplete, out-of-date, irrelevant or misleading, take such steps as are reasonable in the circumstances to associate such a statement so that it will be apparent to users of the information.

10 Links to other websites

Our websites may contain links to other websites. We are not responsible for the privacy practices of linked websites and linked websites are not subject to this Privacy Policy or our privacy practices. We suggest that you review the privacy policy of each website that you visit.

11 Feedback

If you believe we have breached the Privacy Laws, or you have any other complaint, query or concern about this Privacy 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: privacy@villaworld.com.au
Telephone: +61 7 5588 8888
Facsimile: +61 7 5588 8800

We will investigate your complaint and provide you with a response, usually within 30 days. We will always endeavour to resolve any complaint to your satisfaction.

12 Office of the Australian Information Commissioner

If you aren't satisfied with our response, you should contact the Office of the Australian Information Commissioner (**OAIC**), Tel: 1300 363 992 or email: enquiries@oaic.gov.au.

13 Changes to this Privacy Policy

This is our current Privacy Policy outlining our personal information management practices. This Privacy Policy replaces any other privacy policy published by us to date. We may vary this Privacy Policy from time to time. We encourage you to review the Villa World websites regularly to ensure that you are aware of our current Privacy Policy.

14 More information

For more information about privacy in general, you can visit the website of the OAIC at www.oaic.gov.au.