

Privacy Policy – July 2024

1. Privacy generally

This privacy policy governs how Lawport Pty Ltd (ACN 081 074 295), located at Suite 403, Level 4, 163 Eastern Road, South Melbourne, Victoria, 3205, and its affiliated entities (referred to as Lawport, we, us, our) handle personal information.

At Lawport, we recognise the significance of safeguarding individuals' personal information. This policy outlines our commitment to protecting your privacy, detailing your rights concerning your personal information managed by Lawport. It also explains how we collect, store, use, disclose, and manage your personal information.

Lawport adheres to the Privacy Act 1988 (Cth) (Privacy Act) and the Australian Privacy Principles contained within it when collecting, storing, using, disclosing, and managing your personal information. We regularly review our policies and procedures regarding personal information and may update and revise this privacy policy accordingly. Any updated policy will be accessible on our websites, including <https://lawportpropertygroup.com.au/>, or can be obtained by contacting us directly.

2. Kinds of personal information collected

Lawport specialises in developing residential real estate communities and engages in related property development activities. In the course of conducting our business, we may gather personal information.

Personal information refers to details or opinions about an identified or reasonably identifiable individual.

The specific types of personal information that Lawport collects can vary depending on our interactions or dealings with you. Generally, this may include:

- (a) your contact information such as your name, address, telephone number, email address and date of birth;
- (b) proof of identify information such as your driver licence, passport or other similar identity information;
- (c) information regarding your preferences regarding our products and services (including information regarding the residential developments, housing or lifestyle amenities that may be of interest to you or your family);
- (d) details regarding the transactions you undertake in respect of any Lawport developments; and
- (e) other information necessary to provide you with information regarding our products or services or undertake any transactions or dealings with you.

Lawport may also retain other types of personal information as permitted or required by law, or that we inform you of at the time of collection.

As a general practice, we typically do not collect sensitive information about individuals. This category includes details about your health, racial or ethnic background, political views, criminal history, or religious or philosophical beliefs. If there is a need to collect sensitive information, we will do so only with your consent or when authorised or mandated by law.

3. How we collect personal information

Generally, Lawport collects your personal information directly from you. For example, Lawport may collect your personal information:

- (a) when you request information or services from us;
- (b) where you enter into, or propose to enter into, a transaction with us, including the purchase of property;
- (c) where you use our website or other services or otherwise interact with us; or
- (d) if you post information to any of our social media sites or interact with us on social media.

Generally, Lawport will only collect your personal information from sources other than you if it is unreasonable or impracticable to collect that personal information from you. However, in some cases, Lawport may collect your personal information from someone other than you, for example, from:

- (e) Latitude Real Estate Pty Ltd (Latitude), who provide real estate services to us in relation to the property developments we undertake. Latitude may collect information from you where you visit a display centre for our property developments, submit an enquiry via a website for our property developments or attend an event at which our property developments are promoted;
- (f) other service providers that help us provide our services;
- (g) third parties you authorise to disclose your information to us; and
- (h) a publicly maintained record or other publicly available sources of information including social media and similar websites.

4. Purposes for which personal information is used

In general terms, Lawport collects and utilises personal information to enhance, refine, and promote our services while conducting our property development operations. Some examples of how Lawport collects, holds, uses, and shares your personal data include:

- (a) communicating with you;
- (b) addressing your inquiries and providing requested information;
- (c) managing our property development operations and delivering services to you;
- (d) enhancing and refining our products, services, and residential communities;
- (e) administering, managing, and processing transactions, such as property purchases;
- (f) assisting in the management of services provided to you; and
- (g) complying with applicable legal obligations.

Additionally, Lawport may use your personal information for other purposes disclosed to you during collection, as well as for purposes permitted or required by law.

When using or disclosing personal information, Lawport takes reasonable steps to ensure its relevance to the intended use or disclosure purpose. While you are not obligated to provide your personal information, withholding certain details may impact Lawport's ability to provide services or information to you, or affect the nature of our interaction with you.

Apart from the purposes outlined, Lawport may use and disclose your personal information to inform you about promotions, competitions, events, products, or services that may interest you. This may involve sharing your information with Lawport's related companies or other entities with whom Lawport has a commercial relationship. If you prefer not to receive such communications, you can opt-out by contacting Lawport using the details provided in our privacy policy or through the opt-out option in any marketing communication you receive.

5. Disclosure of personal information

Lawport shares your personal information for the purposes for which it is collected. Therefore, typically, Lawport will only disclose your personal information for the reasons outlined in paragraph 4 of this Privacy Policy. This may involve sharing your personal information with:

- (a) related and associated companies of Lawport;
- (b) Latitude, as a service provider or commercial partner involved in our property development projects;
- (c) our service providers, financiers, agents, contractors, and other third parties who assist us, including technology and administration service providers;
- (d) potential acquirers of Lawport or any of its businesses or assets;
- (e) investors or entities acquiring an interest in Lawport or its businesses or assets;
- (f) Lawport's professional advisors, such as legal, accounting, auditing, consulting, insurance, and other advisors;
- (g) Government authorities where necessary under the law.

Lawport may also disclose your personal information for other purposes if we inform you of the disclosure when collecting the information, if we have obtained your consent, or if the disclosure is required or permitted by law.

If you post information or other content in public sections of our website or on our social media platforms, you acknowledge that this information or content may be accessible to the public and/or users of those websites or social media platforms.

6. Overseas disclosures

Some of the parties that Lawport discloses your personal information to may be located outside Australia. We take reasonable steps to ensure that any such overseas recipients do not hold, use or disclose your personal information in a way that is inconsistent with the obligations imposed under the Privacy Act and the Australian Privacy Principles in the Privacy Act.

7. Links to other websites

When you visit our website or use our online services, we may include links to other websites for your convenience, including sites operated by our partners, affiliates, or independent third parties. These links are provided solely as a convenience. Each website has its own privacy practices, which are detailed in their respective privacy policies. These practices may differ from those outlined in our privacy policy, and we recommend reviewing each website's privacy policy carefully before providing any information.

Furthermore, when you follow a link to a website operated by an independent third party, please note that we do not have control over that third party and cannot be held responsible for any information you submit to that site.

8. Cookies & Google reCAPTCHA

Lawport may gather statistical information through your interactions with our websites and any associated online platforms, utilising functionalities and technologies of your internet browser such as cookies and pixel tags. This information helps us analyse the usage patterns of our websites and online services, aiming to enhance their functionality and user experience by making them more personalised and user-friendly. Please note that these technologies do not identify you personally unless you provide identifiable information explicitly.

You have the option to disable these browser features that allow us to collect statistical data by adjusting specific settings in your internet browser. However, doing so may affect the speed of your browsing experience or render certain web pages inaccessible.

Our website also uses Google reCAPTCHA, provided by Google LLC, to enhance security and prevent automated access or abuse of our services. This feature operates by analysing user interactions with our website to distinguish between human users and bots. The use of Google reCAPTCHA is subject to Google's Privacy Policy and Terms of Service.

9. Security of personal information

Lawport employs reasonable measures to safeguard your personal information from misuse, interference, loss, unauthorised access, modification, or disclosure. Your personal data is stored in databases hosted on servers situated in physically and technologically secure environments, accessible only to authorised personnel or contractors. For personal information kept in hard copy, it is stored in controlled, access-restricted premises accessible solely to authorised personnel or contractors.

We conduct regular training sessions for our employees to ensure they understand and comply with this privacy policy. Employees who do not adhere to these guidelines may be subject to disciplinary action. Additionally, internal procedures are in place to monitor and enforce company-wide adherence to this privacy policy.

Lawport will securely destroy or de-identify personal information when it is no longer necessary, unless retention is required or authorised by law.

10. Access and correction

Lawport takes reasonable steps to ensure that the personal information we hold is accurate, up-to-date, complete, relevant, and not misleading.

Under the Privacy Act, you have the right to access and correct the personal information held by Lawport. If you wish to access or correct your personal information, or if you seek further information about Lawport's approach to privacy, please contact the Lawport Privacy Officer using the details provided in paragraph 11 below. Lawport will provide access to your information to the extent required or authorised by the Privacy Act or other applicable laws. We also take reasonable steps to correct personal information when necessary and appropriate.

To access your personal information:

- (a) you will need to provide proof of identity to ensure information is disclosed only to the correct individuals, protecting others' privacy.
- (b) please specify the details of the information you require.
- (c) Lawport may charge a reasonable administration fee based on the actual cost of providing access in accordance with your request.

Lawport aims to respond to access or correction requests within 30 days. If we refuse your request, we will provide written reasons for the refusal and information about complaint procedures. If you are dissatisfied with Lawport's decision, you may lodge a complaint with the Office of the Australian Information Commissioner.

11. Contacting Lawport

For further information or enquiries regarding your personal information, or if you would like to opt-out of receiving any promotional or marketing communications or make a privacy complaint, please contact Lawport's Privacy Officer using the following contact details: info@lawport.com.au

12. Privacy complaints

Please direct any privacy complaints to Lawport's Privacy Officer. All privacy complaints will be handled in accordance with the following principles:

- (a) they will be taken seriously.
- (b) they will be addressed promptly.
- (c) they will be treated confidentially.
- (d) your existing obligations or commercial arrangements with Lawport will not be affected.

Upon receipt of your complaint, Lawport will acknowledge it within 10 days and strive to resolve it within 30 days, unless an extension is agreed upon in writing. Our Privacy Officer will conduct an investigation into your complaint and inform you of the outcome once the investigation is complete. If you are not satisfied with the resolution or the extended timeframe provided by Lawport, you may escalate your complaint to the Office of the Australian Information Commissioner.