

# Landence Group Privacy Policy

## 1 Introduction

Xu Hui International Group Co., Pty Ltd and its related bodies corporate (together **we, our, us**) recognise the importance of protecting the privacy and the rights of individuals in relation to their personal information. This document is our Australian privacy policy and it tells you how we collect and manage your personal information of anyone we deal with in Australia.

We respect your rights to privacy under the *Privacy Act 1988 (Cth)* (**Act**) and we comply with all of the Act's requirements in respect of the collection, management and disclosure of your personal information.

## 2 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 we collect personally identifies you, or you are reasonably identifiable from it, the information will be considered personal information.

## 3 What personal information do we collect and hold?

We may collect the following types of personal information:

- name;
- mailing or street address;
- email address;
- telephone number (including mobile phone number);
- facsimile number;
- age or birth date;
- profession, occupation or job title;
- nationality and citizenship status;
- details of any property and/or services you have purchased from us or which you have enquired about, together with any additional information necessary to deliver such services and to respond to your enquiries;
- 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, through our representatives or otherwise; and
- information you provide to us through our service centre, promotions or customer surveys.

We may also collect some information that is not personal information because it does not identify you or anyone else. For example, we may collect anonymous answers to surveys or aggregated information about how users use our website.

#### **4 How do we collect your personal information?**

We 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 in ways including:

- through your access and use of our website (including specific project websites that we might establish for a given project);
- through enquiries made by you on other websites such as domain.com.au and realestate.com.au;
- during conversations between you and our representatives; or
- when you complete an application, enquiry / information form or reservation form or enter into a contract for sale.

We may also collect personal information from third parties including:

- from third party companies such as credit reporting bodies, law enforcement agencies and other government entities; and
- from third parties that own and operate webpages that are in anyway connected with our business (for instance, realestate.com.au).

#### **5 What happens if we can't collect your personal information?**

If you do not provide us with the personal information described above, some or all of the following may happen:

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

#### **6 For what purposes do we collect, hold, use and disclose your personal information?**

We collect personal information about you so that we can perform our business activities and functions and to provide best possible quality of customer service.

We collect, hold, use and disclose your personal information for the following purposes:

- for compliance with laws and regulations governing the sale of real estate;

- for the purposes for which it was collected (as advised on our website at the time of collection);
- to provide services to you and to send communications requested by you;
- to fulfil obligations under any sale of land contract;
- to answer enquiries and provide information or advice about existing and new developments, properties, events, special offers, competitions, promotions or services;
- to assess the performance of our website and to improve the operation of the website;
- to obtain opinions or comments about our services and developments;
- 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 and research purposes of Xu Hui International Group Co., Pty Ltd, its related bodies corporate, contractors or service providers;
- to provide your updated personal information to our related bodies corporate, contractors or service providers;
- to update our records and keep your contact details up to date;
- to process and respond to any complaint made by you; 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.

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

## **7 To whom may we disclose your information?**

We may disclose your personal information to:

- our employees, related bodies corporate, owners corporations of the projects we develop, contractors or service providers for the purposes of operation of our website or our business, fulfilling requests by you, and to otherwise provide products and services to you including, without limitation, web hosting providers, IT systems administrators, mailing houses, couriers, payment processors, data entry service providers, electronic network administrators, debt collectors, and professional advisors such as accountants, solicitors, business advisors and consultants;
- suppliers and other third parties with whom we have commercial relationships, for business, marketing, and related purposes;
- government authorities such as the Foreign Investment Review Board, the Victorian Department of Transport, Planning and Local Infrastructure and local city councils; and

- any organisation for any authorised purpose with your express consent.

We may combine or share any information that we collect from you with information collected by any of our related bodies corporate (within Australia).

## **8 Direct marketing materials**

We may send you direct marketing communications and information about developments, properties and services that we consider may be of interest to you. These communications may be sent in various forms, including mail, SMS, fax and email, in accordance with applicable marketing laws, such as the *Spam Act 2003* (Cth). 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 endeavour to use that method whenever practical to do so. In addition, at any time you may opt-out of receiving marketing communications from us by contacting us (see the details below) or by using opt-out facilities provided in the marketing communications and we will then ensure that your name is removed from our mailing list.

We do not provide your personal information to other organisations for the purposes of direct marketing.

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

You may request access to any personal information we hold about you at any time by contacting us (see the details below). Where we hold information that you are entitled to access, we will try to provide you with suitable means of accessing it (for example, by mailing or emailing it to you). We may charge you a fee to cover our administrative and other reasonable costs in providing the information to you. We will not charge for simply making the request and will not charge for making any corrections to your personal information.

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 if it would result in a breach of confidentiality. If that happens, we will give you written reasons for any refusal.

If you believe that personal information we hold about you is incorrect, incomplete or inaccurate, then you may request us to amend it. We will consider if the information requires amendment. If we do not agree that there are grounds for amendment then we will add a note to the personal information stating that you disagree with it.

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

If you believe that your privacy has been breached, please contact our Privacy Officer using the contact information below and provide details of the incident so that we can investigate it.

We request 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 our Privacy Officer using the contact details below. 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 we have completed our 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 we have changed our view.

## **11 Do we disclose your personal information to anyone 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 your personal information to entities located outside of Australia, including the following:

- our related bodies corporate, located in China;
- our data hosting and other IT service providers, located in United State or another country from time to time; and
- other third parties located in China.

## **12 Contacting us**

If you have any questions about this privacy policy, any concerns or a complaint regarding the treatment of your privacy or a possible breach of your privacy, please use the contact link on our website or contact our Privacy Officer using the details set out below.

We will treat your requests or complaints confidentially. Our representative will contact you within a reasonable time after receipt of your complaint to discuss your concerns and outline options regarding how they may be resolved. We will aim to ensure that your complaint is resolved in timely and appropriate manner.

Please contact our Privacy Officer at:

Privacy Officer  
Xu Hui International Group Co., Pty Ltd  
Post: Level 47, Rialto South Tower, 525 Collins Street, Melbourne VIC 3000  
Email: info@landence.com.au

## **13 Changes to our privacy policy**

We may change this privacy policy from time to time. Any updated versions of this privacy policy will be posted on our website. Please review it regularly.

This privacy policy was last updated on 27 November 2020.