

Privacy Policy

Lend Lease Development

1. About this policy

This section describes the purpose of our policy and explains how to read it.

1.1 Purpose of this policy and general overview

The LLD Privacy Policy explains how our organisation manages and protects your Personal Information. Our Privacy Policy lays down the principles by which we collect, store, use and disclose any Personal Information you provide to us or we collect from other sources.

Our Privacy Policy also informs individuals about how they can access their Personal Information held by us, correct Personal Information (if necessary), lodge complaints or make any related enquiries.

Although the Lend Lease Group has a Global Privacy Policy applying to its operations internationally, this LLD Privacy Policy is specifically designed to apply to LLD's national operations under Australian privacy law. To the extent of any inconsistency between the Lend Lease Global Privacy Policy and the LLD Privacy Policy, the latter prevails.

LLD is subject to the Australian Privacy Principles as set out in the Privacy Act.

1.2 Interpretation of this document

Definitions:

- "**APPs**" refer to the Australian Privacy Principles in the Privacy Act.
- "**LLD**" collectively refers to Lend Lease Development Pty Ltd ACN 000 311 277, Lend Lease Apartments Pty Ltd ACN 132 930 495, Lend Lease Communities (Australia) Pty Ltd ACN 000 966 085 and other companies in Lend Lease's development and communities business.
- "**Privacy Act**" refers to the *Privacy Act 1988 (Cth)* as amended by the *Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Cth)* and as otherwise amended from time to time.
- "**Personal Information**" is information that is capable of identifying an individual which may include name, address and date of birth.

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- **"Sensitive Information"** is certain Personal Information relating to an individual's health, religion, racial or ethnic origin, sexual orientation or practices, political affiliations or views, genetics, biometric information, philosophical beliefs, professional or trade association or union membership or criminal record.

2. Types of information we collect and hold

LLD collects and holds Personal Information about the individuals who are interested in our products or services or with whom we have dealings. These individuals may include: purchasers, tenants, investors, contractors, consultants, suppliers, job applicants and other individuals with whom we have dealings in the course of our business.

We only collect Personal Information which is relevant to our dealings with the particular individuals and which is reasonably necessary for our business activities. Examples of the information that may be collected include:

- Name, date of birth, address and contact details;
- Financial information and credit worthiness;
- Information to verify identity such as driver's licence or passport details;
- An individual's tax file number;
- Information regarding product preferences and opinions;
- Property ownership information;
- Demographic information;
- Job application information;
- Employment information;
- Survey responses;
- Competition entries;
- Enquiry/complaint details;
- Information relating to incidents connected to our business such as personal injuries, misconduct, breach of conditions or unlawful activity;
- Information about how you interact with us.

Generally, LLD does not collect Sensitive Information about individuals. However, if Sensitive Information is required arising out of LLD's particular dealings with an individual, LLD will collect the information with the consent of the individual or as otherwise authorised by law.

3. How we collect your information

We may collect Personal Information from individuals through our marketing, sales, business development, operational, human resources, research or other activities. Examples of the ways in which we collect Personal Information include:

- Via an individual's access to our websites, email/online communication services, social media profiles, mobile applications and other online facilities ("**Online Facilities**"), including information relating to individuals' devices and location;
- When an individual makes a direct enquiry to our staff regarding our products or services;

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- Through participation in surveys and questionnaires;
- From records of any communications, dealings or interactions you have with us via the Online Facilities, telephone, writing, in person or otherwise;
- From records from any audio or visual recording devices used at our premises and in connection with our Online Facilities.

We have a general policy to collect Personal Information directly from you, unless it is unreasonable or impracticable to do so. However, in some cases Personal Information may be collected from third parties such as real estate agents, credit agencies, government bodies and other Lend Lease Group companies.

4. Direct marketing

From time to time, we may send you direct marketing about our products and services that we consider may be of interest to you. In doing so, we are subject to the various laws affecting direct marketing including the Privacy Act and the Spam Act 2003 (Cth). Under these laws we often need to conduct direct marketing in accordance with consent or the reasonable expectations of individuals. We will also include an opt-out procedure in our direct marketing communications. This means you will be able to easily unsubscribe from all future marketing communications, if you so wish.

5. Purpose for which we collect and deal with your information

As a general principle, we use Personal Information for the primary purpose for which we collect the information or a secondary purpose related to the primary purpose for which you would reasonably expect us to use the collected information.

We will take reasonable steps to make you aware of the purpose for which we collect your information, for example by notifying you about the relevant matters of that collection.

We will not use your information for an unrelated secondary purpose unless we obtain your consent or an exception applies, such as it is impracticable to obtain your consent and we believe that collecting, using or disclosing your information is necessary to lessen a serious threat to the life, health or safety of any individual.

The following are examples of the purposes for which we collect, hold, use, and deal with Personal Information:

- To provide you with information regarding products or services in which you are interested;
- To provide, administer and develop our products, services, properties, programs and Online Facilities;
- To conduct research (including market research and data analytics), planning, security and testing;
- To maintain and update our records;
- To verifying your identity and Personal Information;
- To manage our relationships with current, former and prospective purchasers, tenants, investors, contractors, consultants, suppliers and other individuals with whom we have dealings;
- To understand individuals' preferences, interests and behaviour;
- To work effectively with our related companies and service providers;
- To comply with our legal obligations and protect our lawful interests;
- Where Lend Lease suspects that fraud or unlawful activity has been, is being or may be engaged in; and

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- Where a third party acquires or wishes to acquire, or makes inquiries in relation to acquiring, an interest in the Lend Lease Group.

6. Cross border transfer or disclosure of information

In the event we engage in cross border transfer of information, such as routing or storing information on cloud servers located overseas or transferring information to an office of our company overseas, we will ensure that adequate security mechanisms are in place to protect your information. Lend Lease Group is a global organisation, and Personal Information may be sent to a range of countries including Australia, UK, EU countries, USA, Middle Eastern countries, China, Singapore, Malaysia and Japan.

7. Maintaining the integrity, currency and safety of your privacy information

This section explains how LLD holds your Personal Information, how you can access your Personal Information, update your Personal Information, complain about an alleged breach of the APPs or make any related enquiry.

7.1 Maintaining currency of your information

LLD relies on accurate and reliable information to deliver necessary and effective services. If we are satisfied that any of the information we have about you is inaccurate, out-of-date, irrelevant, incomplete or misleading, or you request we correct any information, we will take reasonable steps to ensure the information held by us is accurate, up-to-date, complete, relevant and not misleading.

If we disclose your Personal Information that is later corrected, you may ask us to notify the entity that received the incorrect information about that correction.

Should we refuse to correct the information, we will explain the reasons for refusal. We will also show you the complaint procedure if you wish to lodge a formal complaint about our refusal.

7.2 Safety of your information

All Personal Information is securely stored using appropriate physical and/or electronic security technology, settings and applications, and by ensuring staff dealing with Personal Information are trained in our privacy policies and procedures.

These policies are designed to protect Personal Information from unauthorised access, modification or disclosure and from misuse, interference and loss.

We hold personal information at our own premises and with the assistance of our service providers.

8. Accessing your information or lodging a complaint

8.1 Accessing and correcting information

You are entitled at any time, upon request, to access your Personal Information held by us. We will respond within a reasonable time after the request is made and give access to the information in the manner requested by you, unless it is impracticable to do so. We are entitled to charge you a reasonable administrative fee for giving you access to the information requested.

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Should you be refused access to your information, we will explain the reasons for refusal - any exceptions under the Privacy Act or other legal basis relied upon as the basis for such refusal – and, if you wish to lodge a formal complaint about our refusal, we will explain the complaint procedure.

8.2 Lodging a complaint

Should you wish to complain about a potential breach of this Privacy Policy or the APPs please contact our Privacy Officer.

The Privacy Officer will make good faith efforts to rectify the issue and respond within a reasonable period after the complaint is made.

8.3 Contact details

The Privacy Officer

Lend Lease Development

Level 4, 30 The Bond, 30 Hickson Road

Sydney NSW 2000

Ph: (02) 9236 6111

email: privacy@lendlease.com

9. Changes to Our Policy

We may amend or modify our Privacy Policy from time to time and will post the amended Privacy Policy on our website.

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