

SEA PALM BEACH

7TH AVENUE

Privacy Policy

1. Policy

BluePoint Property is bound by the Australia Privacy Principles ('APPs') in the Privacy Act 1988 (Cth). BluePoint Property understands the importance of, and is committed to, protecting your personal information. This Privacy Policy explains how BluePoint Property manages your personal information, including its obligations and your rights in respect of BluePoint Property dealings with your personal information. Please take a moment to read our Privacy Policy as it describes what happens to your personal information (that is, information or an opinion about you, whether true or not, which identifies you or from which your identity is reasonably identifiable) that is collected via BluePoint Property's website seapalmbeach.com.au ("the Website").

2. Collection of your personal information

2.1 We will collect and hold your personal information in a fair and lawful manner, and not in an unreasonably intrusive way. Where it is reasonably practical to do so, BluePoint Property will collect your personal information directly from you. However, in certain cases BluePoint Property may collect personal information from third parties, including from publicly available sources.

2.2 We may collect the personal information you directly give to us through some of the following means:

- (a) when you make an inquiry or order in relation to services through our Website;
- (b) when you contact us regarding the services you have requested;
- (c) when you login on the Website;
- (d) from other related correspondence (whether in writing or electronically);
- (e) while conducting customer satisfaction and market research surveys;
- (f) when administering any of our services; and
- (g) as otherwise required to manage our business.

3. Types of personal information collected

3.1 The type of personal information we may collect can include (but is not limited to), your name, postal address, email address, phone numbers and billing information/credit card information. We may also ask for information such as job function, job title, industry sector, company and country.

3.2 Where you do not wish to provide us with your personal information, we may not be able to provide you with requested goods or services.

4. Purposes for handling your personal information

4.1 As a general rule, we only process personal information for purposes that would be considered relevant and reasonable in the circumstances. We will only collect information that is necessary for the purposes as described in this Privacy Policy, or other purposes specifically communicated to you. We use fair and lawful methods to collect personal information.

4.2 We collect, hold, use and disclose personal information to:

- (a) provide you with our services;
- (b) manage and administer those services;
- (c) communicate with you regarding the services you have requested;
- (d) comply with our legal and regulatory obligations; and
- (e) otherwise to manage our business.

5. Use and disclosure of your personal information

5.1 Some of the primary purposes for which we use and disclose personal information include:

- (a) marketing to you;
- (b) the sale of properties including residential townhouses;
- (c) maintaining customer records; and
- (d) supply of services.

5.2 We may also use and disclose your personal information that we collect for a secondary purpose. A secondary purpose is one which is related to the primary purpose of collection. Some of the secondary purposes for which we may collect your personal information include:

- (a) services development;
- (b) customer and market research; and
- (c) to keep you informed of any changes to our business, services or other offerings that may be of interest to you.

5.3 We generally do not disclose your personal information to third parties or organisations, unless they are contracted or employed to provide administrative services on our behalf and are bound by the APPs.

5.4 We will not use or disclose your personal information for any other purpose unless you have consented to that use or disclosure.

6. Protection of personal information

6.1 At BluePoint Property your personal information is treated with the greatest of care. We maintain appropriate physical, procedural and technical security at our offices and information storage facilities so as to prevent any loss, misuse, unauthorized access, disclosure, or modification of personal information. This also applies to disposal of personal information.

6.2 We further protect personal information by restricting access to personal information to those who need access to do their job. Physical, electronic and managerial procedures have been employed to safeguard the security and integrity of your personal information.

7. Direct marketing

7.1 Like most businesses, marketing is important to our continued success. We would therefore like to stay in touch with customers and let them know about new opportunities. We may provide you with information about new products, services and promotions.

7.2 We may disclose your personal information to third parties for marketing purposes.

7.3 However, you may opt out at any time if you no longer wish to receive commercial messages from us. You can make this request by contacting our Privacy Officer.

8. Cookies (Optional)

8.1 A cookie is a small text file stored in your computer's memory or on your hard disk for a pre-defined period of time. We use cookies to identify specific machines in order to collect aggregate information on how visitors are experiencing this website. This information will help to better adapt this website to suit personal requirements. While cookies allow a computer to be identified, they do not permit any reference to a specific individual. For information on cookie settings of your internet browser, please refer to your browser's manual.

9. Accessing and correcting your personal information

9.1 You may contact our Privacy Officer to request access to the personal information that we hold about you and/or to make corrections to that information, at any time. On the rare occasions when we refuse access, you will be provided with a written notice stating the reasons for refusing access. We may seek to recover from you reasonable costs incurred for providing you with access to any of the personal information about you held by us.

9.2 We are not obliged to correct any of your personal information if we do not agree that it requires correction and may refuse to do so. If we refuse a correction request, you will be provided with a written notice stating the reasons for the refusal.

10. Overseas transfers of personal information

10.1 As the internet is a global environment, using the internet to collect and process personal information necessarily involves the transmission of that information worldwide.

10.2 As at the date of this Privacy Policy, we are not likely to disclose personal information to overseas recipients. If in future we do propose to disclose personal information overseas, we will do so in compliance with the requirements of the Privacy Act. We will, where practicable, advise you of the countries in which any overseas recipients are likely to be located.

10.3 If you do not want us to disclose your information to overseas recipients, please let us know.

10.4 From time to time we may engage an overseas recipient to provide services to us, such as cloud-based storage solutions. Please note that the use of overseas service providers to store personal information will not always involve a disclosure of personal information to that overseas provider. However, by providing us with your personal information, you consent to the storage of such information on overseas servers and acknowledge that APP 8.1 will not apply to such disclosures. For the avoidance of doubt, in the event that an overseas recipient breaches the APPs, that entity will not be bound by, and you will not be able seek redress under, the Privacy Act.

11. Resolving personal information concerns

11.1 If you have any questions, concerns or complaints about this Privacy Policy, or how we handle your personal information, please email our Privacy Officer at geordie@bluepointproperty.com.au or write to:

Geordie Whitcombe
The Privacy Officer
BluePoint Property
PO Box 766
Paddington QLD 4064
Tel: 0424 432 729
Email: geordie@bluepointproperty.com.au

11.2 Once a query has been lodged, the Privacy Officer will respond to you as soon as possible.

11.3 If you are not satisfied, you may also lodge a complaint with the Office of the Australian Information Commissioner by telephone: 1300 363 992 or email: enquiries@oaic.gov.au.

12. Changes

12.1 We reserve the right to change the terms of this Privacy Policy from time to time, without notice to you. An up-to-date copy of the Privacy Policy is available on our Website www.seapalmbeach.com.au

The last update to this document was 14 June 2018.