

GREENPOOL MANAGEMENT CO. PTY LTD PRIVACY POLICY

Greenpool Management Co. Pty Ltd (ACN 646 523 122) (**Greenpool**) is committed to protecting your privacy and the confidentiality of your personal information and sensitive information in accordance with the *Australian Privacy Principles* contained in the *Privacy Act 1988* (Cth) and the *Privacy Amendment (Notifiable Data Breaches) Act 2017* (Cth) (**Australian Privacy Legislation**).

The Greenpool Privacy Policy explains, in further detail, the types of personal information we collect, how we collect and use this information, who we may disclose it to, how you can access and change your personal information and how you can make a privacy complaint.

What kind of information do we collect and/or hold?

What kinds of information do we collect?

- 1 The types of personal information that Greenpool, or a third party contractor, may collect and hold includes the following:
 - 1.1 full name, postal address, e-mail address, telephone and fax numbers;
 - 1.2 occupation;
 - 1.3 date of birth, gender and marital status;
 - 1.4 bank account details and credit card details;
 - 1.5 any other information you provide to us by any means; and
 - 1.6 information associated with web browsing, such as your IP address.
- 2 Generally, the kind of information that Greenpool will collect and/or hold will depend on the kind of project or development we are concerned with – **essentially, the purpose of the activity we are conducting**. Accordingly, the kinds of information we record will usually simply extend to your name, applicable contact details and minimal financial details (such as your tax file number).
- 3 On occasion we may collect and/or hold other kind of information – such as when we run a promotional event or a competition. When we do this, we will disclose our intention to do so to you.
- 4 Further, the kind of information we collect and/or hold may extend to other things, such as the composition of your family, marital status and/or your specific needs or interests.
- 5 At all times, Greenpool will take reasonable steps to inform you of the kind of personal information it collects and holds when you are engaged with it, and how this may vary from project to project.

What kinds of information can we hold?

- 6 We are permitted to collect and/or hold, with your consent, the following kinds of information:

- 6.1 Personal information, being information or an opinion about an identified individual, or an individual who is reasonably identifiable.
 - 6.2 Sensitive information, being information or an opinion about an individual's personal preferences or characteristics (such as race, ethnicity, political views, memberships, religious or philosophical beliefs and sexual preference), health information and/or biometric information.
- 7 Sensitive information is afforded a higher level of protection than other kinds of information under the Australian Privacy Legislation. We collect and hold sensitive information only when you knowingly and voluntarily submit it. We will rarely collect and hold this kind of information.

How do we collect your personal information and how do we hold it?

How do we collect your personal information?

- 8 Greenpool may collect personal information from or about you in a number of circumstances, including:
- 8.1 from publicly available sources of information;
 - 8.2 when you use our services or contact us directly;
 - 8.3 when you sign up to receive information from us;
 - 8.4 when you use our website and/or via software, such as cookies and web/tracking pixels (also known as "web beacons");
 - 8.5 when you provide or offer services to us;
 - 8.6 from a third party entity engaged to collect the personal information from you on behalf of Greenpool;
 - 8.7 from our own records at Greenpool; and
 - 8.8 when legally required to do so.

Means of collection

- 9 We will only collect your **personal information** when the information is *reasonably necessary for*, or *directly related to*, one or more of Greenpool's functions or activities.
- 10 We will only collect your **sensitive information** when you *consent* to the collection of the information and the information is *reasonably necessary for*, or *directly related to*, one or more of the Greenpool's functions or activities.
- 11 Greenpool will, at all times, take reasonable steps to collect your personal information **directly from you**, unless:
- 11.1 it is unreasonable or impracticable for us to do so;
 - 11.2 we have contracted with a third party entity to collect the information from you and to store the information for us;

- 11.3 you consent to the collection of the information from someone other than you; or
- 11.4 we are required or authorised by or under an Australian law, or a court/tribunal order, to collect the information from someone other than you.
- 12 If we receive your personal information from a third party, via referral and/or via a purchase list, we will take reasonable steps to inform you of that and seek your consent to our collection of that information. Should you refuse to consent to that collection, we will take reasonable steps to destroy or de-identify that information.

Cookies Policy

What are cookies?

A cookie is a small text file stored on your computer's browser. Many cookies from websites will be visible from your browser. You will usually find information on cookies and how to manage them under "options" or "settings" in your browser. You can choose to see cookies before deleting them and to keep cookies from some sites.

There are several different types of cookies (some of which are used on Greenpool's website):

- **First party cookies:** A "first party" cookie is sent from a website to your web browser when you visit that site. This is how websites "record" or "remember" things like your customised settings (such as your location), your shopping cart contents and your log in details.
- **Temporary cookies:** Temporary cookies generally only last for one browsing session (until you close your web browser).
- **Persistent cookies:** Persistent cookies remain on your computer after you close your browser and will be sent back to the applicable website each time you visit it.
- **Third party cookies:** Third party cookies are sent by businesses that provide content, such as advertising, on websites that you visit. Many websites feature advertising from third parties and those third parties may use cookies to track your browsing activities. They will normally use this information to "show" you targeted advertising – that is, advertising relating to products or services they think you will be interested in based on your prior web searches.
- **Tracking / web pixels (also known as "web beacons"):** Tracking pixels are clear picture files used to keep track of your navigation through a single website or a series of websites. Tracking pixels are normally used by websites that use third party traffic monitoring and tracking services.
- **Local Stored Object cookie or "flash cookies":** Flash cookies contain more information than the other kinds of cookies referred to above and are not generally cleared when you clear cookies in your web browser.

Why and how does Greenpool use cookies?

- 13 Generally we use cookies to learn about the way you interact with Greenpool's content and to help us to improve your experience when visiting Greenpool's website.
- 14 Greenpool may record your visit through the use of cookies and may log the following information for **purely statistical purposes**:
- your server address;
 - your top-level domain name (eg. .com, .gov, .uk, etc);
 - the date and time of your visit to Greenpool's site;

- the pages accessed and documents downloaded by you;
- the previous site(s) visited by you; and
- the type of browser used by you.

Most of the information collected by cookies will not be sufficient to identify you – this is because the information collected will be very “general” in nature, relating to your interests (i.e. the products you have looked at) and the websites you have visited previously. Information collected via cookies will only be deemed to be “personal information” for the purposes of the Australian Privacy Legislation if it makes you or any other individual reasonably identifiable.

Greenpool will not facilitate the merging of personally-identifiable information with non-personally identifiable information collected through any cookies, tracking/web pixels or Google advertising products or features, unless it has robust notice of and the relevant party’s consent to that merger.

Third party cookies

15 Third party cookies are sent by different organisations (such as businesses which provide content such as advertising) to the owner of the website you are visiting – so in this instance this means by organisations other than Greenpool.

16 Third party cookies are used on Greenpool’s website to enable remarketing and reporting for impression assisted visits, website conversions, user demographics and user interests.

17 The third party cookies we may use on our website include (but are not limited to):

- **Google Analytics:** Greenpool uses Google Analytics, a web analytics service provided by Google Inc. Reports obtained from Google Analytics are used to help improve the efficiency and usability of Greenpool’s website.

Google Analytics uses first party cookies and JavaScript code to gather statistics about how this website is accessed. It anonymously tracks how our visitors interact with this website, including which website they came from previously and what they did on the site (i.e. which pages they visited). The information generated by the cookie and JavaScript code about your use of the website (including your IP address) will be transmitted to and stored by Google on servers located outside of Australia.

Google will use the information transmitted to it for the purposes of evaluating your use of our website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may transfer this information to third parties where it is required to do so by law or where such third parties process the information on Google’s behalf.

- **Google Analytics Advertising Features:** Greenpool also uses Google Analytics Advertising Features. By enabling the Advertising Features, Greenpool enables or permits Google Analytics to collect data about the traffic to Greenpool’s website via the use of Google advertising cookies and identifiers, in addition to the data collected through the standard Google Analytics feature.

The Google advertising cookies are used to, among other things, select advertising for users based on what is relevant to them, to improve reporting on campaign performance and to avoid showing ads the user has already seen.

- **YouTube:** We embed videos or insert links to videos from YouTube from time to time on our website. As a result, when you visit a page with content embedded from or linked to YouTube, you may be presented with cookies from these websites.
- **Facebook tracking / web pixel:** The Facebook tracking / web pixel is a piece of code provided by Facebook that is placed on or within a website to alert Facebook when a “conversion” is complete – that is, when a party clicks on a Facebook advertisement and then connects with website(s) of the party responsible for the advertisement.

For example, if an e-commerce company wishes to pay affiliates based on how many items are purchased on their site, they would need some way to correlate the purchases on their site with the advertisements that were viewed or clicked on the affiliate site – the pixel enables the e-commerce company to do this.

Greenpool makes use of this tracking / web pixel to run and facilitate the campaigns and competitions it runs via Facebook. The tracking / web pixel allows Greenpool to track the “conversions” that happen as a result of Greenpool’s Facebook advertisements.

How can I manage, reject and/or delete cookies?

- 18 We will not use cookies to collect personally identifiable information about you.
- 19 However, if you **do not want information** collected through the use of cookies, there is a simple procedure in most browsers that allows you to deny or accept the cookie feature. You should note that cookies may be necessary to provide you with features and/or functions on this website and on other websites.
- 20 As noted above, Greenpool sometimes links to or embeds content from other websites and organisations such as Facebook and YouTube. Greenpool does not control the dissemination of third party cookies from these sites. In order to manage and/or reject and delete third party cookies, you will need to refer to the privacy policies of the relevant third party website(s).
- 21 If you want to control or opt out of the operation or application of Google Analytics and/or the Google Analytics Advertising Features, you should refer to Google’s guide(s) on opting out of those features at:
<http://www.google.com/intl/en/policies/privacy/>.

Social media

- 22 When you browse and make use of Greenpool’s social media pages (such as Facebook, Twitter and YouTube), you are using an external site and are therefore subject to the privacy policies and practices of that site. If you have any questions or concerns regarding that site’s privacy policies and practices, you should review the privacy policy of the relevant site. Greenpool does not endorse, and is not accountable for, any views expressed by third parties using that site.

- 23 Greenpool records all information posted to its social media pages and uses that information for the purposes of administering the pages, for record keeping, for considering and/or addressing any comments made and for running competitions and campaigns. No attempt will be made to further identify social media subscribers except where requested and authorised by law.

Notification of collection

- 24 When Greenpool collects personal information about you, it will take reasonable steps to notify you or to otherwise ensure you are aware of certain matters. These matters include:
- 24.1 our identity as an organisation and contact details;
 - 24.2 the context of the collection;
 - 24.3 whether the collection is required or authorised by law;
 - 24.4 the purposes of the collection;
 - 24.5 Greenpool's usual disclosure of personal information;
 - 24.6 information about our privacy policy; and
 - 24.7 whether Greenpool is likely to disclose your personal information to overseas recipients.
- 25 Greenpool will take reasonable steps to provide this notification before, or at the time, it collects your personal information. If it is not possible for it to do so, Greenpool will take reasonable steps to provide notification as soon as practicable after collection.
- 26 If you choose not to provide certain personal information to us, we may not be able to provide you with access to parts of the Greenpool website or to certain content, products and services available on the Greenpool website or generally from Greenpool.

How do we hold and store your information?

- 27 All of the personal and sensitive information we collect is stored on our local based cloud system. Information storage is maintained by our accredited Information Technology partner.
- 28 At this stage in time, Greenpool stores personal or sensitive information through a third party local data storage cloud based system.
- 29 Greenpool also maintains a number of hardcopy collections of records and electronic databases for use by staff, these include:
- 29.1 project files (e.g. land acquisition, land planning, land development and land disposal);
 - 29.2 administration files (e.g finance, strategic planning and information technology);
 - 29.3 human resource management files; and

29.4 a library collection.

- 30 Current files are held on site or with project managers, whilst non-current files are archived to an offsite commercial storage facility.
- 31 The library collection consists of books, journals and reports produced by or for Greenpool in relation to its projects. The collection is maintained onsite with non-current documents archived in a similar manner to files. Access to the library collection is on a similar basis to that for files.
- 32 When and where Greenpool receives unsolicited information, Greenpool will determine whether it could have collected the information under *Australian Privacy Principle 3* (which governs the collection of solicited personal information). Where Greenpool could not have collected the information consistent with *Australian Privacy Principle 3*, Greenpool will destroy or de-identify the information as soon as practicable, so long as it is lawful and reasonable for it to do so.

Security

- 33 Greenpool strives to ensure the security, integrity and privacy of the personal and sensitive information of its clients. Greenpool takes reasonable steps to protect the security of all personal information.
- 34 Greenpool personnel are required to respect the confidentiality of personal information and the privacy of individuals.
- 35 We use a variety of physical and electronic security measures, including restricting physical access to our offices and firewalls and secure databases to keep personal information secure from misuse, loss or unauthorised use or disclosure.
- 36 Greenpool continually reviews its various security measures in order to ensure that they are up to date and fit for purpose.

Information retention and destruction practices or obligations

- 37 Greenpool will only retain your personal and/or sensitive information as long as it is necessary for it do so, or where and when it is required to do so by legislation or a court or tribunal order.
- 38 Greenpool has an internal system that is used to identify information that is no longer necessary for it to retain and periodically reviews its data in accordance with this system.
- 39 Once the purpose for which that information was collected expires and/or upon periodic review, Greenpool will take reasonable steps to destroy that information or to de-identify that information, so that it can be retained for statistical purposes.
- 40 Information which is retained for statistical purposes may be used to improve our products and services and to make us more responsive to the needs of our customers. This statistical compilation and analysis of information may also be used by us or provided to others as a summary report for marketing, advertising or research purposes.

Do we retain a record of personal information about all individuals with whom we deal?

- 41 We will only collect and/or hold personal information about you when you have consented to us doing so. This information will only be retained for the purpose for which it was collected and will, at the expiry of that purpose, be destroyed or de-identified, in line with Government record keeping.

Unsolicited personal information

- 42 Greenpool may receive your personal or sensitive information as **unsolicited personal information**.
- 43 Unsolicited personal information is received by an organisation, such as Greenpool, where it took no active steps to collect that information.
- 44 When and where Greenpool receives unsolicited information, Greenpool will determine whether it could have collected the information under *Australian Privacy Principle 3* (which governs the collection of solicited personal information). Where Greenpool could not have collected the information consistent with *Australian Privacy Principle 3*, Greenpool will destroy or de-identify the information as soon as practicable, so long as it is lawful and reasonable for it to do so.

Dealing with us via pseudonym or anonymously

- 45 In most circumstances, it will not be possible or practicable for Greenpool, in the course of conducting its activities, to deal with individuals who have not identified themselves or who have used a pseudonym.
- 46 Greenpool is required and/or authorised under Australian law, in certain circumstances, to deal only with individuals who have identified themselves.
- 47 However, on the expiry of the purpose for which certain information was collected and/or on the request of the individual the subject of the information, Greenpool will take reasonable steps to de-identify that information through the use of pseudonyms and/or to make the applicable personal details anonymous.

The purpose of our collection, holding of, use or disclosure of personal information

How and in what circumstances will Greenpool use or disclose my personal information?

- 48 Greenpool may, in certain circumstances, collect, hold, use and/or disclose your personal and/or sensitive information.

By way of a guide, these terms are defined as follows in section 6 of the *Privacy Act* and in the *Australian Privacy Principles Guidelines*:

An entity **“holds”** personal information *“if the entity has possession or control of a record that contains personal information”*.

An entity **“uses”** personal information *“where personal information is handled, or an activity is undertaken with the information, within the entity”*.

An entity **“discloses”** personal information *“when it permits that information to become known outside the entity and releases it from its effective control”*.

49 **Greenpool will use and disclose your personal information to provide our services to you or to fulfill administrative functions associated with these services.** In general, we will use and disclose your personal information for any purpose for which the information was provided, or any related purpose.

50 Greenpool will **disclose** personal information when it permits that information to become known outside Greenpool and where it releases it from its effective control. For example, Greenpool would be said to have disclosed your personal information where:

50.1 it shares your personal information with another entity;

50.2 it publishes your personal information on the internet so it is accessible by others;

50.3 where one of its staff reveals your personal information in the course of a conversation with a person who does not work for Greenpool; or

50.4 where one of its staff members sends a document containing your personal information to someone who is not you.

Primary purpose and secondary purposes

51 Your personal and/or sensitive information will only be used and disclosed for the **primary purpose** for which it was submitted or for such other **secondary purposes** that are related to that purpose, unless we disclose other uses in this privacy policy or at the time of the collection of that information.

Definition pursuant to *Australian Privacy Principles Guidelines*:

Primary purpose refers to the particular purpose for which the information in question was collected.

Secondary purpose is any purpose other than the primary purpose for which we have collected your personal information.

52 We will only make use of or disclose your personal information for a **secondary purpose** if:

52.1 you have consented to the use or disclosure of that information;

52.2 you would reasonably expect Greenpool to use or disclose the information for the secondary purpose;

52.3 the use or disclosure of that information is required or authorised by or under legislation or court/tribunal order;

52.4 a “permitted general situation” exists in relation to the use or disclosure of the information by Greenpool; or

52.5 Greenpool reasonably believes that the use or disclosure of the information is reasonably necessary for one or more enforcement related activities conducted by, or on behalf of, an enforcement body.

53 If Greenpool discloses information pursuant to clause 52(e), Greenpool will make a written record of the use or disclosure.

- 54 When collecting your information we will inform you of the primary purpose of our collection and/or any anticipated secondary purpose that may arise. The purpose of our collection will vary from project to project, depending on the nature of the project and the nature of your involvement and/or interest in the project.

Who can access my personal information and what conditions apply to their use of my personal information?

- 55 As a general rule, your personal and sensitive information will only be accessed and/or viewed by Greenpool and its third party contractors staff and officers, as and when it is appropriate or necessary.
- 56 Where a party, other than an employee or officer of Greenpool, has access to the personal information of individuals, they will be required to comply with the applicable Australian privacy legislation and, where appropriate, to enter into Privacy Agreements with Greenpool.
- 57 The access and use of your personal or sensitive information by a third party will be restricted to the purpose for which it was first collected and/or to a closely related secondary purpose.

Direct marketing

Definition pursuant to the *Australian Privacy Principles Guidelines*:

Direct marketing involves the use and/or disclosure of personal information to communicate directly with an individual to promote goods and services. A direct marketer may communicate with an individual through a variety of channels, including telephone, SMS, postal mail, e-mail and online advertising.

- 58 Greenpool will not use or disclose your **personal information** for the purpose of direct marketing, unless:
- 58.1 we collected the information from you;
 - 58.2 we obtained your consent to the use or disclosure of the information for that purpose (except where it was impracticable to do so);
 - 58.3 you would reasonably expect Greenpool to use or disclose the information for that purpose;
 - 58.4 we provide you with an easy to use means of opting out of receiving any further direct marketing communications; and
 - 58.5 you have not requested that we cease sending you direct marketing communications.
- 59 As mentioned above, Greenpool makes use of a number of Google Analytics Advertising Features, including remarketing. The remarketing feature allows Greenpool to reach people who have previously visited its website and to match users with appropriate advertising.
- 60 If you would like to control or opt out of the application of the Google Analytics Advertising Features, you should refer to Google's guide(s) on opting out of those features.

- 61 Greenpool will only make use of your **sensitive information** for direct marketing purposes if you have consented to the use or disclosure of that information for that purpose.
- 62 If you receive direct marketing communications from Greenpool or from an associated entity, you are entitled to:
- 62.1 request that you receive no further direct marketing communications for Greenpool and/or the associated entity; and
 - 62.2 request that Greenpool disclose the source of the information.

Opting-out

- 63 Greenpool will take reasonable steps to facilitate a request by you to opt-out of receiving direct marketing communications. This may be a request to opt-out of receiving certain communications or to opt-out altogether.
- 64 Greenpool will not charge you for making such a request or for giving effect to such a request.
- 65 Greenpool will take reasonable steps to give effect to such requests within a reasonable period of time after the request is made and will reply to a request for the source of the information in a reasonable period of time (unless it is unreasonable or impracticable for us to do so).

E-mails

- 66 We may use your e-mail address to send you Greenpool publications, newsletters, seminars or events. We may also contact you by e-mail to seek your opinion or comment on our website and our service offerings.
- 67 Greenpool, at all times, aims to comply with the terms of the *Spam Act 2003* (Cth) and will not send unsolicited commercial electronic messages or "spam".
- 68 All commercial electronic messages sent by Greenpool include information about the individual or organisation who authorised the sending of the message.
- 69 You can unsubscribe from our e-mails at any time. You can also contact us if you would prefer not to receive this information and we will comply with your request.

How can you access your personal information and/or seek the correction of your personal information?

- 70 You have a right to access the personal information we hold about you and to request the correction of any personal information we hold about you.
- 71 Greenpool will take reasonable steps to ensure that the personal information it collects and discloses is accurate, up to date, complete and relevant.

Requests for access to personal information

- 72 You can make a request for access to your personal information informally, in writing. Greenpool aims to, whenever possible, facilitate informal requests for personal and/or sensitive information.

- 73 Applications and enquiries should:
- 73.1 be made in writing;
 - 73.2 give enough information so that the documents requested can be identified;
 - 73.3 give an Australian address to which notices can be sent; and
 - 73.4 be lodged at Greenpool.

Determination process

- 74 Greenpool is not required to give you access to personal information to the extent that:
- 74.1 Greenpool reasonably believes that giving access would pose a serious threat to the life, health or safety of an individual, or to public health or public safety;
 - 74.2 giving access would have an unreasonable impact on the privacy of other individuals;
 - 74.3 the request is frivolous or vexatious;
 - 74.4 the information relates to existing or anticipated legal proceedings between the entity and the individual, and would not be accessible by the process of discovery in those proceedings;
 - 74.5 giving access would reveal the intentions of Greenpool in relation to negotiations with you in such a way as to prejudice those negotiations;
 - 74.6 giving access would be unlawful;
 - 74.7 denying access is required or authorised by or under legislation or a court/tribunal order;
 - 74.8 giving access would be likely to prejudice one or more enforcement related activities conducted by, or on behalf of, an enforcement body; or
 - 74.9 giving access would reveal evaluative information generated within Greenpool in connection with a commercially sensitive decision-making process.

Providing access

- 75 Should you experience difficulty in determining the correct route through which to request access to your personal information, please contact our Privacy Officer and they will provide you with assistance.
- 76 Greenpool will take reasonable steps to respond to a request for access within a reasonable period of time after the request is made (within 45 days) and to give access to the information in the manner requested by the individual, if it is reasonable and practicable to do so.
- 77 Greenpool reserves the right to charge you a minimal fee for providing you with your personal information as set out at [83] below.

- 78 If that Greenpool refuses to give you access to the personal information requested by you, we will give you a written notice which sets out the reasons for the refusal (except to the extent that it would be unreasonable to do so) and the mechanisms available to you to complain about the refusal.

Request for correction of personal information

- 79 You can make a request for the correction and/or amendment of your personal information informally, in writing, or pursuant to the terms of the *Freedom of Information Act*.
- 80 Applications to have personal information held by Greenpool corrected or amended should:
- 80.1 be made in writing to the Privacy Officer;
 - 80.2 provide enough information to determine what changes are required; and
 - 80.3 provide you current contact details.
- 81 If Greenpool refuses to correct your personal information, Greenpool will give you a written notice which sets out the reasons for the refusal (except to the extent it would be unreasonable to do so) and the mechanisms available to you to complain about the refusal.
- 82 Greenpool will take reasonable steps to respond to a request for access within a reasonable period of time after the request is made (within 45 days) and will not charge you for the making of the request or for the correction of the personal information.

Charges

- 83 The charges are as follows:
- 83.1 Type of fee:
 - Personal information about the applicant: no fee
 - Application fee (for non-personal information): \$30
 - 83.2 Type of charge:
 - Charge for time dealing with the application (per hour, or pro rata): \$30
 - Access time supervised by staff (per hour, or pro rata): \$30
 - Photocopying staff time (per hour, or pro rata): \$30
 - Per photocopy: \$0.20
 - Transcribing from tape, film or computer (per hour, or pro rata): \$30
 - Duplicating a tape, film or computer information: Actual cost
 - Deliver, packaging and postage: At cost

- 83.3 Deposits
- Advance deposit may be required for the estimated charges: 25%
 - Further advance deposit may be required to meet the charges for dealing with the application: 75%
 - For financially disadvantaged applicants or those issues with prescribed pensioner concession cards, the charge payable is reduced by 25%

Privacy Officer

84 Applications and enquiries should be addressed to;

Att: Privacy Officer

Greenpool Management Co. Pty Ltd

Address: Level 1, 45 Stirling Highway, Nedlands WA 6010

E-mail: admin@greenpoolcapital.com

Data breaches

85 We are committed to protecting information we hold about you, and to compliance with the Notifiable Data Breaches scheme.

86 Where we become aware of a potential data breach which is likely to result in serious harm to any individuals about whom we hold information, we will:

- investigate the suspected breach and determine scope of any breach that has occurred and the risk of harm to affected individuals whose information may have been compromised;
- notify you and the Privacy Commissioner of the potential breach; and
- take steps to minimise any harm caused to affected individuals as a result of the breach.

How can I complain about a breach or give feedback on how Greenpool deals with my personal information?

87 Should you wish to provide Greenpool with feedback with respect to its management of your personal information, to complain about a breach by Greenpool in relation to its privacy obligations, or to appeal a decision with respect to a request for access to or the correction of personal information, please contact the Privacy Officer in the first instance.

88 The Privacy Officer will take reasonable steps to respond to your complaint and/or feedback within 45 days.

89 If you wish to have a decision refusing access to your personal information and/or refusing to correct your personal information reviewed or to lodge a complaint with respect to the management of your personal information, please contact our Privacy Officer.

Disclosure of personal information to overseas recipients

- 90 Generally, Greenpool does not disclose the personal and/or sensitive information of its customers to overseas recipients.
- 91 However, there is a possibility that, on occasion, your personal information may be disclosed to an overseas recipient. The location of any recipients will vary depending on the purpose concerned.
- 92 If a particular project will or may involve the disclosure of personal or sensitive information to an overseas recipient, Greenpool will take reasonable steps to inform you of that potential use or disclosure as soon as possible. As part of our notification process, Greenpool will inform you of the location and/or identity of that recipient.
- 93 Similarly with other third party recipients and/or partners of Greenpool, we will take reasonable steps to ensure that any overseas recipients comply with privacy policies and regulations which are similar to or more strenuous than those required by the applicable Australian legislation.
- 94 Should you have any queries about the potential disclosure of your personal information to an overseas recipient, please contact the Privacy Officer.