



Title	Privacy Policy - Public
Type of procedure	Corporate
Procedure owner	General Manager Corporate Services
Approving body	Board
Last reviewed	May 2017
Next review	May 2020

1. Application

1.1. This policy of Fed Square Pty Ltd (**FSPL**) applies to individuals who visit, attend or otherwise access Federation Square or who otherwise engage with FSPL (including via its websites including www.fedsquare.com, by hiring spaces for events, or using its facilities such as car parking). To the extent to which any such person's Personal Information is collected or held by FSPL in the context of their being an employee, consultant or contractor engaged by FSPL, the separate policy for Personnel applies.

1.2. In this policy:

- **"You"** means any person in respect of whom Personal Information is provided to or collected by FSPL and **"Your"** has a corresponding meaning;
- **"APPs"** means the Australian Privacy Principles set out in the *Privacy Act 1988*;
- **"Personal Information"** means information or an opinion about an identified individual or an individual who is reasonably identifiable, whether the information or opinion is true or not and whether the information or opinion is recorded in a material form or not;
- **"Privacy Law"** refers to the *Privacy Act 1988* and the APPs;
- **"Sensitive Information"** means Personal Information about Your racial or ethnic origin, political opinions or memberships, religious beliefs or affiliations, philosophical beliefs, professional or trade association/union memberships, sexual preferences and practices, or criminal record; and
- **"Us"** and **"We"** means FSPL, and **"Our"** has a corresponding meaning.

1.3. To discharge Our responsibilities in relation to the management of Federation Square, We need to collect and handle a range of Personal Information from You.

1.4. We value the privacy of Your Personal Information, and We are required to comply with the Privacy Law and the APPs. The APPs may be accessed at the website of the Office of the Australian Information Commissioner: www.oaic.gov.au. This policy describes the practices, procedures and systems We have in place to protect Your Personal Information.

1.5. By providing Your Personal Information to Us in connection with visiting or accessing Federation Square, or by visiting Our website or engaging in other transactions with Us, You consent to Our collecting, using and disclosing Your Personal Information in the ways described in this privacy policy and as otherwise contemplated by the Privacy Act.



2. Why We collect Personal Information

2.1. To achieve Our objectives, We undertake a range of activities which involve collection and use of Your Personal Information. The main purposes for which We collect Your Personal Information are:

- to support Us and the organisations and businesses that conduct activities or provide services at Federation Square;
- to enhance the experience of visitors to Federation Square and provide you with certain facilities and resources, such as free Wi-Fi access;
- to manage security safety and site operations at Federation Square;
- to manage effectively the human resources that support Our operations; and
- to operate Our business, and to promote and publicise Federation Square and the activities undertaken there.

2.2. These activities depend on Our being able to collect certain Personal Information from You. However, unless otherwise notified to you, we will seek at all times to only collect Personal Information in connection with an activity to the extent that it is necessary for the purposes of carrying out that activity.

3. What Personal Information do We collect?

3.1. We may collect Your Personal Information, including names, contact details, occupation and financial information (such as credit card information).

3.2. We may also record Your image as you move through and around the Federation Square precinct, and by entering that precinct You are deemed to consent to such recordings.

3.3. You consent to images of you attending or participating in public events at Federation Square being used by FSPL and its authorised event operators in materials for the purposes of promoting FSPL, its event operators and its activities.

3.4. We will only collect Sensitive Information from You:

- with Your consent, and where it is reasonably necessary for us to pursue one or more of our functions or activities; or
- when We are otherwise permitted under the Privacy Act and the APPs.

3.5. When providing Personal Information, You have the right to remain anonymous or to make use of a pseudonym, to the extent provided under the APPs. However if You choose to remain anonymous or to use a pseudonym, We may not be able to provide you with access to some or all of our products or services.

4. How We collect Personal Information

4.1. We will generally collect Your personal Information directly from You, whether in person, in writing (physical mail or email), by telephone, by social media, through Our website or using security cameras. However, we may collect such information from other parties where:

- You consent to such collection; or
- We are legally required or authorised to do so; or
- it is unreasonable or impractical for Us to collect the Personal Information from You.



Your ongoing use of our services, visiting of our premises, or other engagement with Us (including via social media platforms such as Facebook) will be regarded as consent to our collecting information from third parties.

- 4.2. If We collect Personal Information about you from a third party, We will take reasonable steps to inform you of the information that the third party is providing to Us. However, We may do this by requiring the third party informs You directly that Your Personal Information is being disclosed.
- 4.3. If We receive unsolicited Personal Information about You, We will make an assessment about whether we would be entitled to collect that information under the Privacy Law (for example, because the information is reasonably necessary for one or more of Our functions or activities). If We are not permitted to collect that Personal Information, We will destroy it or ensure that it is de-identified where it is lawful and reasonable for Us to do so.

5. Our use and disclosure of Your Personal Information

- 5.1. We use or disclose Personal Information collected about You for the purpose that it was collected.
- 5.2. Your Personal Information will not be used or disclosed for any secondary purpose unless You have consented to the use or release or the APPs otherwise permit such use or disclosure (for example where required by court order).
- 5.3. Your Personal Information may be disclosed to and used by service providers contracted by Us (including providers of information technology, security, legal, accounting, insurance and business advisory consultant services) in connection with Our management of Federation Square and You consent to that use and disclosure.

6. Overseas Disclosure

Some service providers We use are located in countries outside Australia and Your Personal Information may be disclosed to entities overseas including in the United States of America and New Zealand. By continuing to engage with Us, You will be regarded as having consented to such disclosure, and where equivalent laws are not in place in such overseas jurisdictions you agree that we will not be liable if such recipients are found to breach the APPs

7. How We hold and protect Personal Information

- 7.1. We store Personal Information in hardcopy form and in electronic databases. We use reasonable endeavours to ensure that Our information technology systems and files are kept secured from unauthorised access including by use of measures such as password protection and key pass control.
- 7.2. We take reasonable steps to ensure that Your Personal Information that We hold remains complete, up to date and relevant, and is used and disclosed in accordance with this policy and any consents given or disclosures made when the Personal Information is collected.
- 7.3. When We identify Personal Information about You that is no longer required for any purpose, We will take reasonable steps to cause it to be de-identified or deleted from relevant databases.



8. Accessing and correcting Personal Information We hold about You

- 8.1. You have a right to access Personal Information We hold about You. If your request is particularly complex or requires detailed searching of our records, there may be a cost to you in order for Us to provide You with a response.
- 8.2. If you wish to access or correct any Personal Information We hold about You, You should submit a formal request in writing to Our Privacy Officer (details in section 11 below) and We will make reasonable endeavours to update our records or consider your request for access as relevant.
- 8.3. We may refuse access as permitted under the APPs, for example if:
 - We believe that access would pose a serious threat to health or safety;
 - access would have an unreasonable impact on the privacy of other individuals;
 - access would prejudice Us in legal proceedings or negotiations with you;
 - access would reveal evaluative personal information connected with a commercially sensitive decision making process; or
 - access would be contrary to law.

9. Dealing with Us on-line

- 9.1. We may collect Personal Information that You email to Us or provide when using social media or Our website.
- 9.2. You acknowledge that there are risks in transmitting information across the Internet and that We cannot ensure the security of Personal Information transmitted to Us via on-line channels. However, once We receive Your Personal Information, We will take reasonable steps to protect that information from misuse, loss, interference or unauthorised access, modification or disclosure.
- 9.3. Our website or social media pages may contain links to third party websites and this privacy policy does not apply to the use of, or the protection of information provided to, those websites. It is recommended that the privacy policies of those third party websites are reviewed before you disclose any Personal Information to them.
- 9.4. When You visit Our website the server may attach a "cookie" to your computer's memory. A "cookie" assists Us to store information on how visitors to Our website use it and the pages that may be of most interest. This information helps Us dynamically generate content on web pages specifically designed for You. It also allows us to statistically monitor how many people are using Our site and for what purpose. You should be able to configure Your computer so that it disables "cookies" or does not accept them.
- 9.5. We store the Internet Protocol (IP) address of your computer when You visit Our website. This information is used only to create broad demographic summaries of where Our users come from, e.g., We know what percentage of users come from which part of the world. Our use of these IP addresses, however, does not go so far as to identify the actual users of the site.
- 9.6. If You do not want information collected through Cookies, there is a simple procedure in most browsers that allows You to deny or accept them. However, Cookies may be necessary to provide You with certain features (for example, customized delivery of information) available on the site.



10. Complaints and further information

10.1 If you believe your privacy has been interfered with and you wish to make a complaint, please contact Our Privacy Officer using the details provided in section 11 below.

10.2 The Privacy Officer will investigate Your complaint and notify You of the outcome within a reasonable period of receipt of a valid complaint.

10.3 If You are not satisfied with Our response, You may escalate Your complaint to the Privacy Commissioner:

The Office of the Australian Information Commissioner
Level 3, 175 Pitt Street, Sydney NSW, 2000

Phone: 1300 363 992

Email: enquiries@oaic.gov.au

11. Contact us

If You wish to access or make a correction to any of Your Personal Information that we store, to opt out of direct marketing or to make a complaint, contact Us on the details below:

Fed Square Pty Ltd

Privacy Officer

Phone: 9655 1900

Email: info@fedsquare.com

Federation Square

Corner Swanston and Flinders Streets, Melbourne 3000