

# Privacy Policy

MSQRE Pty Ltd.

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## 1.0 Introduction

MSQRE Pty Ltd, trading as Melbourne Square Property (MSQRE) is subject to the Australian Privacy Principles contained in the Privacy Act 1988 and the Privacy Amendment (Enhancing Privacy Protection) Act 2012.

The purpose of this Policy is to describe how MSQRE complies with the privacy requirements in protecting the personal information MSQRE holds about individuals.

## 2.0 Personal Information

Personal information is defined as 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.

## 3.0 Collection of Personal Information

The type of personal information that MSQRE collects will depend upon what dealings the relevant individual may have with MSQRE.

MSQRE may collect and hold personal information about individuals who:

- purchase, or express an interest to purchase, an OSK Holdings Berhad and/or its Subsidiaries and/or its Group of Companies home or apartment (for example, when entering into a sale and purchase agreement, or when responding to requests for information about a OSK Holdings Berhad and/or its Subsidiaries and/or its Group of Companies home or apartment);
- use MSQRE services, as the owner of a OSK Holdings Berhad and/or its Subsidiaries and/or its Group of Companies home or apartment;
- lease, or express an interest to lease, premises or spaces, including any related guarantors (for example, when negotiating, entering into or applying to enter into a lease with OSK Holdings Berhad and/or its Subsidiaries and/or its Group of Companies property owners);
- supply goods and services (for example, when establishing records and systems to enable payment for goods);
- seek employment with MSQRE or are MSQRE employees (for example, when conducting background checks for the purposes of employment);
- register or subscribe to join MSQRE programs, newsletters or competitions;
- use MSQRE's websites, social media and other online services; or
- may otherwise come into contact with MSQRE.

MSQRE only collects personal information which is reasonably necessary for its dealings with the relevant individual. The types of personal information may include, but are not limited to:

- information that identifies the individual (for example, name, gender, address, contact details, date of birth, photographic or video images);
- information about the individual's financial position and credit-worthiness;
- information about the individual that is required or authorised by law;
- the individual's tax file number;
- the individual's opinion about MSQRE's products, services or staff.

The Privacy Act imposes restrictions on collecting sensitive personal information such as information about religious views, ethnicity, political opinions and personal health. MSQRE generally does not collect sensitive personal information about an individual. However, in certain circumstances, MSQRE may collect some sensitive information if it is necessary to

allow MSQRE to deal with the individual and provided the individual has given consent for MSQRE to do so.

Whenever it is reasonable and practical to do so, MSQRE only collects personal information directly from the individual. In some circumstances, personal information may be provided to MSQRE by other parties such as MSQRE's authorised agents and subcontractors. MSQRE will take reasonable steps to inform the individual that it has the individual's personal information, unless it is obvious from the circumstances.

#### **4.0 Notification of Collection of Personal Information**

When MSQRE collects personal information, MSQRE will generally provide notification of the collection to the individual to inform the individual about the purpose for the collection, the types of entities that the information is disclosed to, the overseas recipients the information is disclosed to (where applicable), and that the MSQRE Privacy Policy contains information about how the individual may access the personal information held by MSQRE and how the individual may make a complaint.

#### **5.0 Use and Disclosure of Personal Information**

MSQRE's policy is only to use personal information for the purpose which was either specified or reasonably apparent at the time when the information was collected. MSQRE may also use or disclose the information collected for any other related purpose for which the individual would reasonably expect it to be used.

If MSQRE wishes to use or disclose the personal information in other circumstances, it needs to obtain the individual's consent to do so.

In general, MSQRE uses personal information for the following purposes:

- providing products or services that have been requested;
- communicating with the individual;
- identifying owners, landlords, and prospective purchasers and tenants and verifying identities;
- identifying premises and verifying premises;
- advertising premises;
- processing applications for lease, and assessing prospective tenant's ability to comply with lease obligations;
- negotiating and preparing contracts for sale and leases and arranging signing of these agreements;
- liaising and exchanging information with owners, and prospective and actual purchasers and tenants and their legal and other advisors in relation to sales and leases of premises;
- managing leases and premises, including collecting rent and preparing required statements of accounts and liaising with goods and services providers in relation to premises;
- confirming whether owners and landlords are registered for GST purposes;
- operating controlled money accounts;
- complying with applicable laws;
- complying with dispute resolution processes;
- helping MSQRE manage and enhance its products and services, including analysing customer feedback and future customer needs;
- providing ongoing information and marketing about products and services to individuals that MSQRE believes may be interested and where the individual has signed up;
- complying with regulatory and legal obligations;
- recruiting employees and contractors; or
- fulfilling its obligations to employees.

## 6.0 Disclosing Personal Information to Other Parties

MSQRE may disclose personal information to other entities within MSQRE.

External parties may be given access to personal information held by MSQRE in certain circumstances. These include, but are not limited to:

- MSQRE's contractors and service providers who assist MSQRE in the operation of its business or to provide a customer service (for example, a company which helps maintain MSQRE's computer systems or sends out MSQRE's mail, other goods and services providers, advertising and media organisations, property data service providers, insurers, legal and other advisers, tradespeople, and payment providers);
- other third parties that MSQRE needs to provide the personal information in the operation of its business (for example, property owners, landlords, prospective and actual purchasers and tenants, referees, mortgagees, head-lessors, MSQRE's existing and prospective clients, strata owners, corporations, valuers, government and statutory bodies, financial institutions and third party operators of tenancy and other databases);
- the Australian Securities Exchange, the Australian Securities and Investments Commission and to other government agencies as agreed to or required by law;
- anyone authorised by a provider of personal information;
- relevant parties in situations when MSQRE is required by law to provide the information.

In addition, if you are a tenant and you fail to comply with your lease, then that fact and your other personal information may be disclosed to third party operators of tenancy and other databases, other agents, courts and relevant tribunals.

MSQRE limits the information disclosed to external parties to what is required for them to know in the operation of MSQRE's business, or what is required by law.

From time to time, MSQRE may disclose personal information to external parties located outside Australia to allow the external parties to perform their services for MSQRE. These currently include organisations located in the countries listed in the Appendix. MSQRE will only disclose personal information overseas when it is necessary for the services provided by these external parties and when it is in accordance with the Australian Privacy Principles. This includes taking reasonable steps to ensure that the external party has appropriate data handling arrangements in place.

MSQRE does not sell personal information to third parties.

## 7.0 Marketing

MSQRE may send marketing materials to its customers or potential customers where MSQRE has collected the personal information from the individual and the individual would reasonably expect MSQRE to use the information for that purpose.

The individual's prior consent will be obtained before MSQRE sends the individual electronic marketing messages, or where personal information is otherwise used for marketing purposes in situations where the personal information has been collected from the individual and the individual would not reasonably expect MSQRE to use the information for that purpose, the personal information has not been collected directly from the individual or where sensitive information is involved.

If the customer no longer wishes MSQRE to use his or her personal information in order for MSQRE to provide marketing materials, the customer is to advise MSQRE via the relevant method provided for in the electronic marketing message sent to the customer or to write to the MSQRE Privacy Officer (refer to contact details below). MSQRE will act and amend its records promptly.

## **8.0 Applying for Employment with MSQRE**

MSQRE collects personal information from individuals who submit applications or register interest for employment with MSQRE. If the application is unsuccessful, MSQRE may retain the information in case a more appropriate opportunity becomes available. The unsuccessful applicant will be advised that they can contact MSQRE to request MSQRE not to retain the applicant's information.

## **9.0 Security of Personal Information**

MSQRE will take reasonable steps to protect personal information that it holds from unauthorised access, modification, misuse, interference and loss. MSQRE maintains physical security measures over its physical premises, and a range of computer and network security measures (such as systems access, firewalls, data encryption) over its electronic systems. MSQRE employees are required to maintain the confidentiality of any personal information held.

If other parties provide support services, MSQRE generally requires them to agree to appropriately protect the privacy of the information provided to them.

## **10.0 Access to Personal Information**

Any individual can request access to the personal information MSQRE may hold about them. To obtain access to the information, the individual needs to write to the MSQRE Privacy Officer (refer to contact details below). MSQRE will require evidence to verify the identity of the individual.

This service is free of charge unless the personal information requested requires preparation time. In this situation, MSQRE will provide an estimate of how much this service will cost and request agreement before proceeding.

In normal circumstances, MSQRE will provide the individual with access to the individual's personal information. However, in some circumstances, there may be legal, regulatory or administrative reasons to deny the requested access. If access is denied, MSQRE will provide the individual with the reasons for doing so.

## **11.0 Changing Personal Information**

If an individual wishes to change personal information that the individual believes may be inaccurate, out-of-date, incomplete, irrelevant or misleading, the individual may write to the MSQRE Privacy Officer requesting the information to be changed.

If MSQRE disagrees with the individual that the personal information should be changed, MSQRE will provide the individual with the reasons for doing so. The individual has the right to request that a notation be included with their personal information to indicate their disagreement with their personal information held by MSQRE.

## **12.0 Collection of other information**

MSQRE may also collect the following information about you:

- A cookie is a small data file that may be placed on the computer of a web user (usually in the browser software folder) during a visit to a MSQRE website. Cookies are necessary to allow the MSQRE website and the user's computer to interact effectively and enhance security. Cookies can record information about the user's visit to assist MSQRE in better understanding the needs of the user. For example, user traffic data may be collected and used to infer the website user's demographic using various web analytic technologies.

- MSQRE sometimes also use performance tracking technology (such as conversion tags) to help MSQRE to track user behaviour on its websites. Such user traffic and performance tracking data is non-personally identifying and is collected on an aggregate level to report statistics to assist MSQRE to improve the quality and relevancy of its services.

If users of the MSQRE website do not wish to receive any cookies, they should set their browser to refuse cookies but this means that they may not be able to use the MSQRE website.

### **13.0 Changes in the Future**

MSQRE reserves the right to change this Policy at any time. MSQRE will notify any changes to this Policy by posting an updated version of the Policy on the MSQRE website at <https://www.msqp.com.au/>.

### **14.0 Complaints**

An individual can make a complaint about the way in which MSQRE has handled an individual's personal information by writing to MSQRE at the contact details in section 15. MSQRE will endeavour to act promptly in response to a complaint.

You may also contact the **Office of the Australian Information Commissioner** as follows:

Phone 1300 363 992  
Web [www.oaic.gov.au](http://www.oaic.gov.au)  
Address GPO Box 5218  
Sydney, NSW  
2001

### **15.0 Contacting MSQRE**

MSQRE can be contacted as follows:

Phone: 0418 888 751  
Email: [baden.lucas@msqp.com](mailto:baden.lucas@msqp.com)  
Address: Baden Lucas  
MSQRE Pty Ltd  
[baden.lucas@msqp.com.au](mailto:baden.lucas@msqp.com.au)

### **16.0 Additional Information on Privacy**

For further information about privacy issues and the protection of privacy, visit the Office of the Australian Information Commissioner's website at <http://www.oaic.gov.au>.

### **17.0 Approved and Adopted**

This policy was approved and adopted by MSQRE on 1 August 2019.

## **Appendix - Disclosure to other countries**

*Updated 20 August 2019*

Personal information may be disclosed to third parties performing services for MSQRE located in the following jurisdictions:

- Singapore.
- Malaysia.
- Philippines.