

# 1 Privacy

In this policy, “BD Building”, “us”, “we” or “our” means BD Building Management Pty Ltd (ABN 70 600 483 476) and its related bodies corporate, partnerships and joint venture entities.

This policy sets out:

- what is considered personal information;
- what personal information we collect and hold;
- how we collect, hold, use or disclose personal information;
- the purposes for which we collect personal information;
- what happens if we are not able to collect personal information;
- how to seek access to and correct your personal information;
- whether we disclose personal information outside Australia; and
- how to contact us.

We may, from time to time, review and update this policy, including taking account of new or amended laws, new technology and/or changes to our operations. All personal information held by us will be governed by the most recent updated policy. Your privacy matters to us, so if you are new to BD Building, please take the time to get to know our practices.

## 2 What is personal information?

When used in this policy, the term “personal information” has the meaning given to it in the Privacy Act 1988 (Cth) (the “Act”). In general terms, it is any information that can be used to personally identify you. This may include (but is not limited to) your name, age, gender, postcode and contact details (including phone numbers and email addresses) and possibly financial information, including your credit card, direct debit or bank account information. If the information we collect personally identifies you, or you are reasonably identifiable from it, the information will be considered personal information.

## 3 What personal information do we collect and hold?

We may collect the following types of personal information:

- name;

- mailing or street address;
- email address;
- telephone number;
- age or birth date;
- profession, occupation or job title;
- details of the services you have purchased from us or which you have enquired about, together with any additional information necessary to deliver those services and to respond to your enquiries;
- any additional information relating to you that you provide to us directly through our website or account establishment and operation practices;
- information you provide to us through our service calls, customer surveys or visits by our representatives from time to time.

## **4 Cookies**

In some cases we may also collect your personal information through the use of cookies and other tracking devices. When you access our website, we may send a “cookie” (which is a small summary file containing a unique ID number) to your computer. This enables us to recognise your computer and greet you each time you visit our website, without bothering you with a request to register or log-in. We also use cookies to measure traffic patterns, to determine which areas of our websites have been visited, and to measure transaction patterns in the aggregate. We use this to research our users’ habits so that we can improve our services. If you do not wish to receive cookies, you can set your browser so that your computer does not accept them. We may also log IP addresses (the electronic addresses of computers connected to the internet) to analyse trends, administer the website, track user movements, and gather broad demographic information.

## **5 How we collect personal information**

We collect your personal information directly from you unless it is unreasonable or impractical to do so. We do this in ways including:

- through your access and use of our website or sending SMS/MMS to us;
- when you fill in a contact form on our website;
- during conversations between you and our representatives; and
- when you complete an application or purchase order.

We may also collect personal information from third parties including:

- third party companies such as credit reporting agencies, law enforcement agencies, the Australian Taxation Office, your bank, immigration agencies and authorities and other government entities;
- contractors and business partners.

## **6 Why we collect, hold, use and disclose personal information**

The primary purpose for which we collect information about you is to enable us to perform our business activities and functions and to provide the best possible quality of customer experience. We collect, hold, use and disclose your personal information for the following purposes:

- to provide services to you and to otherwise conduct business with you;
- to provide you with news, information or advice about our existing and new products and services;
- to communicate with you, including but not limited to, by email, mail, SMS or telephone;
- to manage and enhance our products and services;
- to provide you with access to protected areas of our website;
- to verify your identity;
- to provide as part of business data to third parties if you have authorised us to do so;
- to conduct business processing functions for operation of our business;
- for our administrative, marketing (including direct marketing), promotional, planning, product/service development, quality control and research purposes;
- to investigate any complaints about or made by you, or if we have reason to suspect that you are in breach of any of our terms and conditions or that you are or have been otherwise engaged in any unlawful activity; and/or
- as required or permitted by any law (including the Act).

**We will never share, sell, rent or disclose your personal information other than as described in this Privacy Policy.**

## 7 How do we disclose your personal information?

We may disclose your personal information to:

- our employees, related bodies corporate, partnerships, joint venture entities, contractors or external service providers for the operation of our websites or our business, fulfilling requests by you, and otherwise provide products and services to you, including without limitation, web hosting providers, IT systems administrators, payment processors, data entry service providers, electronic network administrators, debt collectors, and professional advisers such as accountants, solicitors, business advisors and consultants;
- specific third parties authorised by you to receive information held by us;
- the police, any relevant authority or enforcement body, or your Internet Service Provider or network administrator, for example, if we have reason to suspect that you have been engaged in any unlawful activity, and we reasonably believe that disclosure is necessary;
- as required or permitted by any law (including the Act).

## 8 Direct Marketing Materials

We may send you direct marketing communications and information about products and services that we consider may be of interest to you. These communications may be sent in various forms, including mail, SMS or email, in accordance with applicable marketing laws, such as the *Spam Act 2004* (Cth). If you indicate a preference for a method of communication, we will endeavour to use that method whenever practical to do so.

In addition, at any time, you may opt-out of receiving marketing communications from us by contacting us (details below) or by using the opt-out facilities provided (e.g. an unsubscribe link. We will then ensure that your name is removed from our mailing list. **We do not provide your personal information to other organisations for direct marketing.**

If you receive communications from us that you believe have been sent to you other than in accordance with this policy, or in breach of any law, please contact us using the details provided below.

## 9 Accessing and correcting your personal information

You may request access to any personal information we hold about you at any time by contacting us (details below). Where we hold information that you are entitled to access, we will try and provide you with suitable means of accessing it (for example, by mailing or emailing it to you). We will not charge for simply making a request and

will not charge for making any corrections to your personal information. If you make an access request, we will ask you to verify your identity. There may be instances where we cannot grant you access to the personal information we hold. For example, we may need to refuse access if granting access would interfere with the privacy of others, or if it would result in a breach of confidentiality. If that happens, we will give you written reasons for any refusal.

## **10 How You can complain about a breach of privacy**

If you believe your privacy has been breached by us, have any questions or concerns about our Privacy Policy, please contact us using the contact information below and provide details of the incident so that we can investigate it.

We will investigate and deal with privacy breaches. Once our Privacy Officer receives a complaint, whether it is in writing or verbal, the Privacy Officer will commence an investigation with the relevant business unit from which the alleged breach stemmed. The investigator will endeavour to determine the nature of the breach and how it occurred. We may contact you during the process to seek further clarification if necessary. If a breach is found, the Privacy Officer will escalate the matter to management so that the process can be rectified to prevent any further breaches from taking place. We will also contact you to inform you of the outcome of the investigation. We will endeavour to resolve all investigations within a reasonable time.

We will treat your requests or complaints seriously and confidentially. Our representatives will contact you within a reasonable time after receipt of your complaint to discuss your concerns and outline options regarding how they may be resolved. We will aim to ensure that your complaint is resolved in a timely and appropriate manner.

Please contact our Privacy Officer at:

Privacy Officer  
BD Building  
Suite 1, 17 Hollywood Avenue, Bondi Junction NSW 2022  
Tel: 02 9282 2040  
Email: [privacy@bdbuilding.com.au](mailto:privacy@bdbuilding.com.au)

## **11 Disclosure of Personal Information Outside Australia**

We may disclose personal information to our related bodies corporate, partnerships, joint venture entities and external service providers located overseas for some of the purposes listed above. We take reasonable steps to ensure that the overseas recipients of your personal information do not breach the privacy obligations relating to your personal information.

We may disclose your personal information to entities located outside of Australia, including the following:

- our related bodies corporate partnerships and joint venture entities, located in New Zealand;
- our data hosting and Cloud-based IT service providers;
- other third parties operating in jurisdictions including New Zealand, the UK and Canada where you have authorised us to do so.

## **12 Security**

We will take all reasonable steps to protect the personal information that we hold from misuse, loss or unauthorised access. If you suspect any misuse or loss of, or unauthorised access to, your personal information, please let us know immediately.

## **13 Links**

Our website may contain links to other websites operated by third parties. We make no representations or warranties in relation to the privacy practices of any third party website and we are not responsible for the privacy policies or the content of any third party website. Third party websites are responsible for informing you about their own privacy practices.

## **14 Changes to Our Privacy Policy**

We may change this privacy policy from time to time. Any updated versions of this privacy policy will be posted on our website. This privacy policy was last updated in June 2019.