



Lewis Land Group and Privacy

This information explains how we comply with Australian privacy requirements and sets out minimum standards for how we deal with personal information collected and used by the Lewis Land Group. This information may be updated from time to time, and should be read in the context of any additional specific information such as that provided in privacy policies applicable to specific businesses or local areas as displayed on the relevant website from time to time.

In this privacy policy, “**we, our, us or Lewis Land Group**” means Lewiac Pty Ltd ACN 008 524 801 and entities in the Lewis Land group of companies, including Harbour Town Centre Management Pty Ltd, which owns and/or manages Harbour Town Premium Outlets. This policy relates only to the personal information management practices of the Lewis Land Group, and to view the privacy policy of Lend Lease Funds Management Pty Ltd (a co-owner with Lewiac of Harbour Town Gold Coast), please visit the Lend Lease Group Privacy Policy available at www.lendlease.com.

Our system for complying with Australian privacy requirements includes:

- our commitment to compliance with privacy requirements;
- our policy and approach to privacy, as explained in this information;
- our resources allocated to privacy, including our technology systems and services; and
- our people and the training and education we undertake.

Collecting your Personal Information

The businesses operated by the Lewis Land group of companies include:

- property development, investment in residential property (including the master planned community, Sovereign Hills);
- ownership and management of hotel and leisure facilities (including The Fiddler Hotel and Camden Valley Inn in New South Wales and The Belvedere Hotel in Queensland); and
- investment in, and management of real estate assets including Harbour Town Adelaide and Harbour Town Gold Coast.

When you deal with us, we may collect personal information about you such as your name, your contact details, and other information about your circumstances and preferences. Where we do not have your personal information, we are not able to contact you, process your requests, or provide our products or services to you.

The types of personal information that we require will depend on the purposes for collection, but will generally include your name, address, telephone number and email address. We may also collect other information about you, such as your bank account or credit card details if you acquire products or services from us, your birthday if you become a Harbour Town VIP member, or health information if you borrow a wheelchair from us when visiting our Harbour Town Premium Outlets.

We generally collect personal information directly from you, including for example, when you join our loyalty reward programs, complete applications for VIP membership, purchase products or acquire services, celebrate special functions or birthday events, complete email or feedback forms on any of our websites, enter into promotions and competitions, complete surveys, sign up to mailing lists or log on, or access our websites, Wifi services or mobile applications.

We may also collect your personal information from third parties with whom we do business or from publicly available sources, or social networking services, to enable us to contact you and offer our products and services to you, and in doing so we comply with



requirements including providing a facility to allow you to indicate your preferences in relation to contact.

Like many companies, we use technology and tools that tell us when a computer or device has visited or accessed our content. Those tools include services from search engines and other companies, as well as services from our Wifi service (if available), that help us to tailor our services to better suit our customers and potential customers. Search engines provide facilities to allow you to indicate your preferences in relation to the use of those tools in connection with computers and other devices controlled or used by you. Our mobile applications may also collect precise location information from your device if you consent to the collection of the information.

Using your personal information

Generally, we use your personal information to conduct our Group business and activities, and in our efforts to expand and improve our operations. Examples include:

- to provide services to you, and to respond to and process your requests such as for information or services;
- to provide you with marketing communications and invitations and offers for products and services including new products and services that we, or our third party business partners, have not offered before but we believe may be of interest to you (and we will provide you with an opportunity to opt out) and to assist in developing new products and services;
- to operate forums in different media in which you are able to share information, including your personal information, with us and publicly (on the Terms applicable),
- to administer promotional programmes, such as competitions, special offers including birthday vouchers and meals discounts, loyalty rewards and rebate programmes, holding special in-centre and online shopping events, and providing centre management services to customers and retailers;
- to administer, manage and operate our businesses, including operating our Harbour Town Premium Outlet shopping centres, holding special in-centre and online shopping events, conducting promotions and competitions, operating the Harbour Town VIP membership scheme and providing centre management services to customers and retailers;
- to measure and analyse shopping behaviour, and improve our website and our services to you, including your shopping experience;
- to communicate and manage our relationships with our stakeholders;
- to conduct business processing functions including providing personal information to our related bodies corporate, contractors, service providers or other third parties we do business with;
- to improve our website, social media channels and our products and services to you;
- for a business or professional relationship we may have with you;
- if you apply for employment with us, to consider your application;
- for security and risk management purposes;
- for our research and development efforts; and
- for other everyday business purposes that involve use of personal information.

If we use your personal information to contact you and you would prefer not, or if you indicate a preference for a method of communication, please let us know and we will do our best to respect your preference.

When your choice is to continue to deal with us (including when you register, access and use our loyalty programs), we take it that you agree to and consent to our using your personal information in these ways, providing we follow the system and approach we explain in this information and comply with the law.



Storing and disclosing your personal information

In using your personal information, we may disclose your personal information to:

- others, including our consultants, agents, or contractors or external service providers;
- other companies in the Lewis Land Group and their employees, and businesses we are involved in;
- to any Lewis Land Group joint ventures or third party business associates, where authorised or required;
- to owners of the Harbour Town Premium Outlets and their related companies, including Lend Lease Funds Management Pty Ltd, where authorised or required;
- regulatory bodies, government agencies and other parties as permitted by law; and
- in additional ways you may agree to.

Your personal information may be held and processed overseas by our service providers. When we pass on or share your personal information in this way, we take steps to ensure it is treated in the same way that we would treat it.

By providing us with your personal information you consent to us (or sometimes our third party business partners) sending you marketing and promotional material about our business and the products, services, special offers and promotions that we or third party business partners offer. You agree that we may send you such information by post or by electronic means (including email and SMS). You can opt-out of marketing and promotional communications at any time by contacting our privacy officer, or using the opt-out mechanism provided in each communication.

We do our best to keep our records of your personal information up to date and accurate and not to keep personal information that is no longer needed.

We also share with others and disclose information from which personal information has been removed (including aggregated, anonymous or pseudonymised information) so that no privacy is affected.

We sometimes have to pass on personal information for legal or safety reasons or other special circumstances.

Credit checks

If you are seeking to become a tenant of a Harbour Town Premium Outlet centre, we may need to collect, use and disclose particular consumer and commercial credit information (for example, collecting and disclosing particular information to credit reporting agencies or other credit providers about you). Where we intend to collect consumer credit information about you we will provide you with further information about how we will handle that information and obtain specific consents from you.

Security

We use various systems and services to safeguard the personal information we store, as part of our business systems and processes. We take reasonable steps to protect your personal information from misuse, interference or loss and unauthorised access, modification and disclosure with appropriate safeguards and security measures and restrict access to those who have a legitimate business purpose and reason for accessing it.

Personal information is only retained for as long as it is necessary for the identified purposes, to the extent necessary for purposes reasonably related to those identified purposes (for example, resolving disputes) or as required by law.

You should keep in mind that no internet transmission is ever completely secure or error-free. If you provide any personal information to us via our online services (including email), or if we provide information to you by these means, the privacy, security and



integrity of any data transfer over the Internet cannot be guaranteed. When you share information with us, it is at your own risk. If you reasonably believe that there has been unauthorised use or disclosure of your personal information, please contact us.

This website may contain links or references to other websites to which this Privacy Policy may not apply. You should check their own privacy policies before providing your personal information.

Contact with the Lewis Land Group about your personal information

You may wish to contact us to access your personal information, to seek to correct it or to make a complaint about privacy. Our privacy contact details for the Lewis Land Group are set out below;

The Privacy Officer
Lewis Land Group
Level 38, Australia Square
264 George Street. Sydney NSW 2000 Australia

Email: privacy@lewisland.com

Phone: +61 2 9241 1118

We will respond as soon as we reasonably can including, in the case of access and correction requests, if we are unable to provide you with access (such as when we no longer hold or use the information).

We do not impose any charge for a request for access, but we may charge you a reasonable fee for our costs associated with providing you with access and retrieval costs.

For complaints about privacy, we will establish in consultation with you a reasonable process, including time frames, for seeking to resolve your complaint.

Last updated: March 2018