

Lewis Land Group Privacy Policy

This Privacy Policy explains how we comply with the *Privacy Act 1988* (Cth) as amended (including the Australian Privacy Principles) and other applicable privacy laws (**Privacy Laws**), and sets out minimum standards for how we deal with personal information collected and used by the Lewis Land Group. This Privacy Policy may be updated from time to time, so before providing us with personal information, please check the up-to-date version of this Privacy Policy on our website for any changes. This Privacy Policy should be read in the context of any additional notices regarding specific collections of your personal information, if applicable.

In this Privacy Policy, “**we**”, “**our**”, “**us**” or “**Lewis Land Group**” means Lewis Land Group Pty Ltd ACN 008 524 801 and its related bodies corporate, including Harbour Town Centre Management Pty Ltd ACN 001 302 610, which owns and/or manages Harbour Town Premium Outlets. Lewis Land Group may co-own certain properties with third parties that may have different personal information handling practices, and this Privacy Policy does not apply to those third parties.

Our system for complying with Privacy Laws includes:

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

Personal Information

Personal information is any information about an identified individual or an individual who is reasonably identifiable, whether the information is true or not and whether the information is recorded in a material form or not.

Sensitive information is any personal information about your racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, criminal record, health, genetics, biometrics or biometric templates. We generally do not wish to be informed of a person’s sensitive information. We, in any event, will collect, use or disclose sensitive information about you only as allowed by law, for example where we have received your consent to do so or the collection is required by law.

Your consent

By providing your personal information to us directly or through others (including when you register, access and use our loyalty programs), you agree with the terms of this Privacy Policy and consent to the collection, use, and disclosure of that information in accordance with this Privacy Policy and applicable Privacy Laws.

Collecting your Personal Information

The businesses operated by Lewis Land Group include:

- property development, investment in residential property (including the master planned communities, Sovereign Hills and Harbour Shores);
- ownership and management of hotel and leisure facilities (including The Fiddler Hotel and Camden Valley Inn in New South Wales, and The Belvedere Hotel and The Komo Hotel in Queensland); and
- investment in, and management of real estate assets including Harbour Town Premium Outlets Adelaide and Harbour Town Premium Outlets 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 may not be able to contact you, process your requests, or provide our products or services to you.

The types of personal information that we collect will depend on the purposes of 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 in certain limited circumstances.

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, log on to or access our websites or mobile applications, or register to use Wifi services at our shopping centres or hotels and other premises.

We may also collect your personal information from third parties with whom we do business or from publicly available sources, or social networking services.

Navigational data collection


Like many companies, we use technology and tools that tell us when a computer or device has visited or accessed our content. This information is collected via search engines and other third party sources, as well as from Wifi services used at our premises (if applicable). Collecting this information helps us to tailor our services to better suit our customers and potential customers.

Search engines usually 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 that information.

Using your personal information

Generally, we use your personal information to conduct our usual business 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 requests for information or services);
 - to assist in developing new products and services;
 - holding special events, and providing centre management services to customers and retailers;
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- to measure and analyse customer behaviour on an aggregated anonymised basis, 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.

Your personal information may also be used to enable us, our agents, contractors and other relevant third parties (including our third party business partners) to contact you and offer products and services to you, such as by way of direct mail or telemarketing and, where you have opted in, by electronic means (including email, SMS and MMS), or to request your feedback for promotional purposes.

These types of communications may include marketing and promotional materials, invitations and special offers for products and services relevant to us or our third party business partners (including new products and services that may be of interest to you).

Your personal information may also be used to administer promotional programmes, such as competitions, special offers including birthday vouchers and meals discounts, loyalty rewards and rebate programmes.

You can opt-out of receiving marketing and promotional communications at any time by contacting our Privacy Officer, or using the opt-out mechanism provided in each communication.

If you have a preference for a particular method of communication, please let us know and we will do our best to respect your preference.

We may also use your personal information for purposes related to those described above which would reasonably be expected by you.

Disclosing and storing your personal information

We may disclose your personal information to:

- other parties, including our consultants, agents, contractors or external service providers;
- our related bodies corporate and their employees, businesses we are involved in and purchasers or prospective purchasers or our assets or businesses we are involved in;
- any Lewis Land Group joint venture partners or third party business associates, where authorised or required;
- to owners or co-owners (as applicable) of the Harbour Town Premium Outlets and their related companies, including Lendlease 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 disclose your personal information in this way, we take steps to ensure it is treated in accordance with applicable Privacy Laws and in the same way that we would treat it.

We also share with others and disclose information from which personal information has been removed (including aggregated, anonymous or pseudonymised information) so that individuals are no longer identifiable or reasonably identifiable.

We sometimes have to disclose personal information for legal, public health 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 and storage

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.

We do our best to keep our records of your personal information up to date, accurate, and retain your personal information only for as long as is necessary for the purposes set out in this Privacy Policy (including related purposes which would reasonably be expected by you) 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. 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 the privacy policies relevant to those websites 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 or seek to correct it. You can also contact us if you have any questions or concerns about our collection, use or disclosure of personal information or if you believe we have not complied with this Privacy Policy or Applicable Privacy Laws. 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 our information handling practices, we will establish in consultation with you a reasonable process, including time frames, for seeking to resolve your complaint. Our target response time is 45 days.

LLG expects our procedures will deal fairly and promptly with your complaint. However, if you remain dissatisfied, you can also make a formal complaint with the Officer of the Australian Information Commissioner (which is the regulator responsible for privacy in Australia):

Office of the Australian Information Commissioner (OAIC)
Complaints must be made in writing

 1300 363 992

 Director of Compliance
Office of the Australian
Information Commissioner
GPO Box 5218
Sydney NSW 2001

 www.oaic.gov.au

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