

National Pacific Properties Group Privacy Policy

Last updated: 29 April 2025

1. National Pacific Properties Group's commitment to privacy

- 1.1 The National Pacific Properties Group (**NPP Group**) is committed to managing personal information in accordance with the *Privacy Act 1988* (Cth) (**Privacy Act**) and the Australian Privacy Principles under the Privacy Act.
- 1.2 We understand the importance of being open and transparent with you in the way in which collect, hold, store, use and share your personal information. We take protecting your privacy rights very seriously.
- 1.3 We generally collect personal information about you through our sales agents. Our sales agents are third parties that collect information from you both on NPP Group's behalf and for their own purposes. Except in limited situations, the relevant sales agent you are dealing with in relation to an NPP Development will be your main point of contact.
- 1.4 This document sets out how we handle and protect your personal information (including information provided to us from our sales agents), and provides information on your rights in relation to your personal information managed by the NPP Group. This document is referred to as our **Privacy Policy**.
- 1.5 We strongly encourage you to read this document, so that you understand and are comfortable with how we handle your personal information. If you have any questions about this policy, or about NPP Group's handling of your personal information, please contact us using the relevant contact details set out in section 16.

2. About the NPP Group (part of the broader Burbank Group of Companies)

- 2.1 NPP Group is a leading company operating within Australia's land development sector. NPP Group is experienced in delivering small and large scale residential and mixed-use projects, each designed with a unique sense of identity and placing the customer at the forefront of our decision making. In conducting this business, we may collect personal information.
- 2.2 The NPP Group includes:
 - 2.2.1 National Pacific Properties Australia Pty Ltd (ACN 143 678 433);
 - 2.2.2 National Pacific Properties (Clyde) Pty Ltd (ACN 603 876 437); and
 - 2.2.3 National Pacific Properties Australia Twyford Road Pty Ltd (ACN 603 756 654),
and their related bodies corporate (as defined in the *Corporations Act 2001* (Cth)), as well as any other special purpose vehicle (**SPV**) entities created from time-to-time by another entity in the NPP Group for the purpose of a new development project (together, the **NPP Group**).
- 2.3 The NPP Group is a member of the broader Burbank Group of Companies, which includes:
 - 2.3.1 the NPP Group;
 - 2.3.2 Burbank Australia Pty Ltd (ACN 007 099 872);

- 2.3.3 Urban Holdings Australia Pty Ltd (ACN 084 087 392);
 - 2.3.4 Dynamic Trade Solutions Pty Ltd (ACN 098 221 991);
 - 2.3.5 Beacon Building Services Pty Ltd (ACN 165 292 311);
 - 2.3.6 Storage Box Pty Ltd (ACN);
 - 2.3.7 National Pacific Finance Pty Ltd (ACN168 530 961); and
 - 2.3.8 Digital Minds Software Solutions Private Ltd (CIN U93000TG2011PTC078014).
- 2.4 This Privacy Policy only applies to the NPP Group, and the NPP Group is excluded from the Burbank Group of Companies for the purpose of this Privacy Policy. Your interactions with and the handling of your personal information by the Burbank Group of Companies is governed by the separate privacy policy of the specific entity within the Burbank Group of Companies that you are dealing with.

3. When does this Privacy Policy apply?

- 3.1 This Privacy Policy applies to the handling of personal information by:
- the NPP Group; and
 - any other special purpose vehicle entities, as created from time to time, which may be incorporated in respect of a Development.
- 3.2 This Privacy Policy also does not apply to the Burbank Group of Companies. Please contact the relevant entity you are dealing with in the Burbank Group of Companies to obtain a copy of their separate privacy policy.
- 3.3 Our sales agents are also generally required to comply with the Privacy Act. This Privacy Policy does not apply to the handling of your personal information independently by our sales agents. You should contact the relevant sales agent you are dealing with to obtain a copy of their separate privacy policy for further information on how they may handle your personal information.

4. About this Privacy Policy

- 4.1 This document sets out our policies for managing your personal information and is referred to as our Privacy Policy.
- 4.2 In this Privacy Policy:
- **“we”, “us” and “our”** refers to the NPP Group;
 - **“Burbank Group of Companies”** refers to all entities in the Burbank Group listed at 2.3 above, excluding NPP Group;
 - **“you” and “your”** refers to any individual about whom we collect personal information; and



- **“Development”** means a residential or other real estate project or development undertaken by the NPP Group.

4.3 This Privacy Policy sets out how we collect, store, process, use and disclose personal information (including personal information we collect via our sales agents, and personal information submitted to us, whether offline or online). For example, this may include information we collect about you:

- as a purchaser or prospective purchaser of a property;
- as a landowner whose land we are developing or proposing to developing;
- as a builder or supplier to us;
- when you apply for a job with us; or
- when you otherwise interact with us, including by:
 - attending one of our sites (including Development sites and their respective sales offices);
 - asking one of our sales agents to send you information about our Developments or other products and services;
 - opting in to hear from one or more of the NPP Group entities on corporate news and/or projects;
 - sending us an enquiry or providing us with feedback;
 - entering into a promotion, competition or special offer with us (including ‘Refer a Friend’ promotions we may run from time to time); or
 - visiting any of the NPP Group websites, including the NPP website available at <https://www.nationalpacific.com.au/> and any separate websites we may establish for our Developments from time to time (such as <https://www.eliston.com.au/>) (the **Websites**).

4.4 The NPP Group will regularly review its policies and procedures regarding personal information and may therefore update and amend this Privacy Policy from time to time, with or without notice to you. However, where we make a material change to this Privacy Policy, we will provide notice to you (including by updating our Websites, and, where appropriate, notifying you directly or through our sales agents).

4.5 Any updated privacy policy will be made available on our Websites, and or can otherwise be obtained by contacting us and requesting a copy. We recommend that you visit this Privacy Policy regularly to keep up to date with any changes we make.

4.6 Other privacy related notices and terms and conditions may apply to you, such as a privacy collection notice provided by us or the sale agent such as:

- when your register interest for a specific Development;
- when you register as a user through our Builder's Portal;
- by either us or sales agents when you agree to purchase a property;
- when you engage with us as a landowner whose land we will be developing or are proposing to develop;
- when you sign-up for news and offers (including our newsletter) via our Websites; and
- when you apply for a role with us or accept a position working for us.

5. What is personal information?

5.1 "Personal information" is defined in the Privacy Act, and 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.

5.2 In this Privacy Policy, whenever we use the term "personal information", we are referring to this legal definition.

5.3 Personal information does not include:

- aggregated or de-identified data;
- information about the specifications of a property; or
- if you are a contractor, real estate agent or supplier, your business information that does not identify or reasonably identify a person (i.e. in certain circumstances, your business payment details).

6. What kinds of personal information we collect about you and how we collect this information

6.1 You may interact with the NPP Group in a variety of different ways (including indirectly through our sales and marketing agents) and the types of personal information that we collect about you will depend on the type of dealings you have with us.

6.2 Generally speaking, the kinds of personal information NPP Group collects may include:



Type of personal information	What this includes	How/when do we collect this information?
Personal and contact details	<p>This may include your:</p> <ul style="list-style-type: none">- full name;- address;- telephone number;- email address;- date of birth; and/or- gender.	<p>We will most likely collect this information about you indirectly from third parties, including:</p> <ul style="list-style-type: none">- sales agents with whom you register your interest in an NPP Group property;- your other representatives, including your lawyers, financiers or other authorised agents; or- other third parties who are involved in the marketing, promotion and sale of our properties and Developments. <p>We may also collect this information directly from you in person or via our Websites:</p> <ul style="list-style-type: none">- during our interactions with you;- when you submit a "Contact Us" form or otherwise make an enquiry;- when you otherwise subscribe to receive information from us including our newsletters or join our mailing list;- when you fill in a contact form at one of our sales offices;- when you contact us via our online forms, email, phone or social media (including LinkedIn);- when you complete a survey or enter a trade promotion or competition conducted by us (including 'Refer a Friend' promotions run from time to time);- when you visit a property or premises owned or occupied by us, such as one of our Developments or a showroom connected with one of our Developments;- when you engage with us as a landowner whose land we will be developing or are proposing to develop;- if you apply for a position at an NPP Group entity;- when you register as a user through the Builder's Portal on our Website; or

		<ul style="list-style-type: none"> - when you otherwise interact with us on a commercial basis, including as a supplier to us.
Details of lifestyle and preferences	<p>This may include:</p> <ul style="list-style-type: none"> - your living circumstances; - your buyer type e.g. owner ('first home', 'downsizer', 'upsizer', etc) or investor; - your family demographics; - your current employment status; - details of the property that you are interested in or have agreed to purchase; - housing or lifestyle amenities that are of interest to you or your family; - the distance you travel for work; and/or - what prompted you to inspect the project. 	<p>We will most likely collect this information about you indirectly from our sales agents.</p> <p>We may also collect this information directly from you during our interactions with you if you directly reach out to us (including by phone, email or in person).</p>
Workplace information	<p>This may include:</p> <ul style="list-style-type: none"> - details of your employment history; - information about your education, qualifications and certifications; - your tax file number; - your working eligibility rights; - your suitability for the role you are applying for; - details about your referees; - health information and incident reports - <u>this may include sensitive information</u>; and/or - other information provided as part of our recruitment process. 	<p>We may collect this information through our recruitment process when you apply for a position with us, or otherwise during your employment.</p> <p>We may also collect this information about you indirectly from your employer if you are employed by one of our service providers (including builders we engage), for example, in relation to an incident that occurs on one of our sites.</p>
Background check information	<p>Including national police check information (if applicable) – <u>this may include sensitive information, such as if you have a criminal record</u></p>	<p>We may collect this information directly from you through our recruitment process, when you apply for a position with us, or otherwise during your employment.</p> <p>We may also collect this information:</p> <ul style="list-style-type: none"> - from third parties (for example, verification providers, referees, previous employers, or professional registration authorities,); and/or - publicly available information (for example, court decisions).

Proof of identity information	<p>This may include:</p> <ul style="list-style-type: none"> – your driver's licence; – your nationality; – your visa (if applicable); – your tax file number; and/or – other similar identity information. 	<p>We may collect this information directly from you if you are a job applicant or employee.</p> <p>We may also collect this information about you indirectly from third parties, for example, our sales agents assisting with your purchase of an NPP Group property.</p>
Transactional and payment information	<p>This may include:</p> <ul style="list-style-type: none"> – information about transactions that you undertake in respect of any NPP Group properties or Developments; and/or – your bank account or credit card details. 	<p>We may collect this information:</p> <ul style="list-style-type: none"> – if you enter into, or propose to enter into, a transaction with us, including the purchase of property in connection with one of our Developments or our acquisition of your land for the purpose of development; or – during your employment with us.
Financial information	<p>This may include information about your:</p> <ul style="list-style-type: none"> – financial circumstances and objectives; – assets; – income; – liabilities and expenditure; – bank account details and transaction history; and/or – investment preferences. 	<p>We may collect this information about you indirectly from third parties, including:</p> <ul style="list-style-type: none"> – our sales agents, if you enter into, or propose to enter into, a transaction with us, including the purchase of property in connection with one of our Developments; – your other representatives, including your lawyers, financiers or other authorised agents; or – other third parties such as mortgage brokers and/or financial service providers.
Call recording / CCTV information	<p>NPP Group may collect call recordings and CCTV footage.</p>	<p>We may collect call recording information from calls that you make to the NPP Group, noting that you will always be advised of the call recording in advance if applicable.</p> <p>We may collect CCTV footage of you from CCTV surveillance systems that monitor our properties and premises, including our corporate offices, sales suites and Development sites, when you enter such locations.</p>

Images, videos and/or voice recordings	NPP Group may collect images, videos or voice recordings you are featured in.	We may collect this type of personal information directly from you or indirectly through our sales agents if you agree to be photographed or interviewed by us, for example, as part of a promotion such as 'Refer a Friend' promotions we run from time to time.
Information required to be collected by law	NPP Group may also hold other kinds of personal information as permitted or required by law.	We may collect this as required.
Publicly available information	Information that is publicly available online, such as on online forums, websites, and social media channels (for example, information that relates to a complaint, ASIC search results, etc).	We may collect this directly from the publicly available source (e.g. the Land Titles Office, relevant State and Territory Valuers General, ASIC, online forums, websites, or social media channels).
Other types of information collected during our interactions	This may include information that you provide us or our sales agents so that we can provide you with information regarding our properties and related services, or so that we can undertake transactions or dealings with you.	<p>We may collect this information either directly from you or indirectly through our sales agents:</p> <ul style="list-style-type: none"> • when you request information about a property or related services from them; • when you attend an event conducted by us; • when you propose or actually enter into an agreement with us as a landowner, for the NPP Group to develop land on your behalf; • when you submit a form via the website; • if you post information to any of our social media sites, or interact with us on social media; • when you make an enquiry, provide feedback, or make a complaint (via phone, email or in person); and • in your responses to customer satisfaction, service development, quality control, research surveys and similar activities.
Company information	<p>This may include:</p> <ul style="list-style-type: none"> – company information such as the company's ABN or ACN and director details; – ASIC search results; and/or – information about your company's employees, contractors or suppliers. 	We may collect this information from you as part of our supplier onboarding process if you are a current or prospective supplier, or from publicly available sources such as ASIC.

Online and digital services information	<p>This may include information (that is not always identifiable) about your:</p> <ul style="list-style-type: none"> – network and device information (such as your device ID, type and IP address); – geo-location information; – browsing information, including information about how you interact with our Websites, pages you visit, what content you viewed and your session duration; – web form inputs such as your name, address, email address and phone number; – transaction data and/or – information collected from cookies and/or tracking pixels <p>Please see 12 below for further information on the digital information we collect and when it may become personal information.</p>	<p>We may collect this information about you from third party marketing agencies we use, including when you use our Websites, via use of online behavioural tracking technologies such as cookies and/or tracking pixels. For further information, see section 12.</p>
Unsolicited information	<p>Unsolicited personal information is personal information we receive that we have taken no active steps to collect (for example, an employment application sent to us by an individual on their own initiative, rather than in response to a job advertisement).</p>	<p>We may collect this information directly from you when you contact us. Please note that we may keep records of unsolicited personal information to the extent that it is permitted by the Privacy Act (for example, if the information is reasonably necessary for one or more of our functions or activities).</p> <p>If not, we will destroy or de-identify the information as soon as practicable, provided it is lawful and reasonable to do so.</p>

- 6.3 NPP Group may also collect other kinds of personal information that we notify you of at the time of collection.
- 6.4 Generally, we do not collect sensitive information about individuals, except where we collect relevant information from employees, such as health information (as set out above) so that we can support you better. Information about your health, racial or ethnic origin, political affiliations, criminal record and religious or philosophical beliefs are all examples of sensitive information. If we do need to collect sensitive information about you, we will only do so with your consent or where we are required or permitted to do so by law.
- 6.5 NPP Group may direct you to a mortgage broker if you are proposing to enter into, a transaction with us, including the purchase of property in connection with one of our Developments. In such case, NPP Group does not collect credit information about you from the mortgage broker, and the mortgage broker's handling of your personal information (including credit information) will be governed by their own privacy policy.

- 7. Can you deal with us without providing your personal information?**

- ## 8. Why we collect, store and use your personal information

- ## Purpose

Explanation

To acquire land from you either directly or as an equity participant with others

We may handle your personal information to:

- verify your identity;
- communicate with you, including by phone, email, or mail, generally and to facilitate our acquisition or proposed acquisition of your land;
- respond to your queries and provide you with information you request from us;
- carry out our obligations arising from any contracts we enter into with you;
- enforce the terms of any contract that you enter into with us relating to our products and services;
- administer, manage and process any transactions you enter into, or propose to enter into, with us, including the acquisition of your

	<p>and, any applicable payments, our billing and account purposes or otherwise;</p> <ul style="list-style-type: none"> • keep our records accurate, complete and up-to-date; • comply with our legal and regulatory obligations including notifying you of matters that we may be required by law to notify you of.
To sell you a property, or provide you with other property-related services	<p>We may handle your personal information to:</p> <ul style="list-style-type: none"> • verify your identity; • communicate with you, including via or sales and marketing agents, generally as well as about projects you have enquired about, new NPP Group projects and corporate marketing (in accordance with the “Do we use your information for direct marketing” section at 13 below); • respond to your queries and provide you with products, services and information you request from us; • carry out our obligations arising from any contracts we enter into with you; • enforce the terms of any contract that you enter into with us relating to our products and services; • administer, manage and process any transactions you enter into, or propose to enter into, with us, including the purchase of property, any applicable payments, our billing and account purposes or otherwise in connection with one of our Developments; • help us to manage the property-related services we provide to you; • keep our records accurate, complete and up-to-date; • conduct trade promotions, competitions, giveaways and events; • investigate incidents (including potential incidents) which occur on or at our Development sites, properties or premises; • manage our relationship with you, including by resolving complaints or improving our customer service; • develop and improve the residential and other properties we develop, and the property-related services we provide, including by obtaining your feedback regarding such or by conducting market research; and/or • comply with our legal and regulatory obligations including notifying you of matters that we may be required by law to notify you of.
To manage your working relationship with us (including if you are an employee or contractor)	<p>We may handle your personal information to:</p> <ul style="list-style-type: none"> • verify your identity; • recruit employees and contractors; • consider your suitability as a prospective employee or contractor; • manage our working relationship with you; • investigate incidents (including potential incidents) which occur on or at our Development sites, properties or premises; and • collect, store and use your personal information for administration and management purposes.
To do business with you	<p>We may collect, store and use your personal information if you interact with us on a commercial basis (such as if you are a service</p>

	provider, sales agent, marketing agent, contractor or supplier to us), or if you otherwise interact with us on a commercial basis.
To manage and improve our operations and business including through Artificial Intelligence	<p>We may collect, store and use your personal information to:</p> <ul style="list-style-type: none"> • obtain finance for our Developments; • conduct the general operation and management of NPP Group, our property development business and to supply our services to you; • train staff (including IT, development, legal and finance teams); • maintain appropriate work, health and safety standards at our development sites, properties and premises; • test and train information technology systems (including artificial intelligence tools); • test, train, improve, maintain and develop our technology systems, products and services, including via the use of Artificial Intelligence tools. • protect the security of our offices, employees, customers and the property held on our premises; • administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes; and • manage payments and debt recovery.
To create de-identified or aggregate data for data analytics	<p>We may collect, store and use your personal information to create deidentified or aggregate data sets (which is no longer personal information). We do this by de-identifying or aggregating your information such as combining your information with information we have about our other customers, for example purchasing information, and with data we obtain from other sources. We use this deidentified or aggregate data to assist with our business decisions, such as to:</p> <ul style="list-style-type: none"> • help us in understanding trends in customer behaviour (such as the success of our properties, and our different marketing campaigns); • create look-a-like audiences for the purposes of providing targeted advertising to other customers; • perform research and statistical analysis, including for customer satisfaction and service improvement purposes; • improve the products and services we offer; and • design, engineer, construct and develop new properties and Developments that better meet our customers' preferences and behaviours.
To assist with any business, share sale or corporate restructure	We may collect, store and use your personal information for the purpose of facilitating or implementing a transfer or sale of all or part of our assets or business or if we undergo any other kind of corporate restructure, acquisition or sale.
To comply with legal and regulatory obligations	We may collect, store and use your personal information for the purpose of complying with our obligations under any applicable laws and regulations, including privacy laws.

8.4 In addition to the purposes listed above, NPP Group may use your personal information for other purposes which we notify you of when we collect your personal information and for purposes otherwise permitted or required by law.

- 8.5 NPP Group only uses and discloses your personal information for the purpose for which it was collected, including related secondary purposes as permitted by privacy laws.

9. Who do we share your personal information with and why?

9.1 NPP Group may share your personal information with third parties:

- for the purpose for which we collect it, as set out in section 8 of this Privacy Policy;
- for other purposes, if we notify you of such when we collect the information; or
- where we have otherwise received your consent, or the disclosure is required or authorised by law.

9.2 Some of the third parties we may share your personal information with includes the following:

Recipient	Explanation
Other members of the NPP Group (as described above at 2)	We may share your personal information with related or unrelated companies (including special purpose vehicles of the NPP Group), as appropriate. For example, if you sign up to receive updates about a development from a member of NPP Group, we may share your information with another member of the NPP Group to tell you about a different development we think might interest you.
Members of the Burbank Group of Companies	We may share your personal information with entities in the Burbank Group of Companies (as appropriate), for example, where that member provides backend IT support or other corporate services to the NPP Group.
Sales agents, real estate agents, mortgage brokers and authorised representatives	We may share your personal information with sales and real estate agents who are assisting with the sale of our properties, where you have expressed interest in finding out more about a property, or making a purchase. We may also share your information with any of your authorised representatives or agents (for example, mortgage brokers), if applicable.
Relevant Land Titles Offices, service providers and partners who assist in the conveyancing process	We may share your personal information with the relevant land Titles Office in your jurisdiction, service providers, partners, and other third parties that provide their services to assist in the conveyancing process in property sales. This may include conveyancing lawyers and financial institutions.

Financial providers	We may share your personal information with our financiers and prospective financiers, financial institutions (for payment processing), and/or mortgage brokers (as relevant).
Our service providers, advisors and other entities we do business with	<p>We may share your personal information with our:</p> <ul style="list-style-type: none"> • service providers (including payment processors), agents, contractors, sub-contractors, builders and their housing consultants, and other third parties that provide services to us, including our technology service providers and administration service providers; and • professional advisors, including legal and accounting firms, auditors, consultants, insurers and other professional advisers. <p>Please note that we may disclose personal information to the service provider and the service provider may in turn provide us with personal information collected from you in the course of providing the relevant products or services.</p>
Corporate restructure	We may share your personal information with people or entities considering acquiring an interest in the NPP Group, Burbank Group of Companies or any business or assets of the NPP Group or Burbank Group of Companies, for the purpose of facilitating or implementing a transfer or sale of all or part of our assets or business, or if we undergo any kind of corporate restructure. In this context, your personal information may be transferred to another entity.
Government and law enforcement agencies	<p>We may share your personal information with law enforcement agencies, other governmental bodies or agencies (for example, the relevant State or Territory Valuers General, ASIC, etc) or third parties:</p> <ul style="list-style-type: none"> – if we are required by law to do so, or in other limited circumstances (for example if required by a court order or regulatory authority; or – in order to conduct our business, for example, if we believe that such action is necessary to prevent fraud or cyber-crime or to protect our website, our products or our technology assets or the rights, property or personal safety of any person).
Responsible authorities, such as local councils and water authorities	We may share your personal information with such authorities to facilitate your purchase or potential purchase of a property from us, or to provide you with other property-related services.
Referees	We may share your personal information with your nominated referees to validate details you have provided us with, including your resume, qualifications, experience, training or abilities.
Marketing agents	We may share your information with marketing agents that assist us with our marketing communications or who send you marketing communications on our behalf. Please see the “Do we use your information for direct marketing” section at 13 below for further information on how we engage in direct marketing.

- 9.3 If you post information or other content to public sections of our Websites, you acknowledge that the information or content may be viewed by the public and/or users of the relevant Website or social media site.

10. Overseas disclosures

- 10.1 We generally collect your personal information in Australia. However, it is likely that we will share your personal information with overseas recipients located in the United States of America, China, Malaysia and/or India. These recipients include our service providers who handle, process or store your personal information on our behalf, for example our IT service providers in India.
- 10.2 We only ever share your personal information outside of Australia where we are permitted to do so under the Privacy Act. This means that we take reasonable steps to ensure that any such overseas recipients do not hold, use or disclose your personal information in a way that is inconsistent with the obligations imposed under the Privacy Act and the Australian Privacy Principles in the Privacy Act.
- 10.3 There are other circumstances where we may disclose your personal information to an overseas recipient. For example, where you have provided your consent or we are otherwise permitted to do so under other relevant laws.

11. Links to other websites

- 11.1 When you access our Websites or other online services, we may provide, as a convenience to you, links to other websites, including sites operated by other entities in the Burbank Group of Companies, our partners, associates, or independent third parties. Each website has its own privacy practices, as described in that website's privacy policy. Those practices may be different than the practices described in this Privacy Policy, and we encourage you to read each website's privacy policy carefully before you use or submit information to that site.
- 11.2 Additionally, to the extent that you follow a link to a website operated by an independent third party, please be aware that we exercise no authority or control over that third party, and cannot and are not responsible for any information that you may submit to that site. We encourage you to read the relevant third party's privacy policy before supplying any personal information to them.

12. Cookies, Pixels and other third-party online tracking technologies

- 12.1 NPP Group may collect statistical information when you access and use our Websites and any online platforms available via our Websites, by utilising features and technologies of your internet browser and built into our website infrastructure, including cookies and tracking pixels. We use these tracking technologies for a variety of purposes, including to:
- collect data about our website traffic;
 - analyse how our Websites are being used,
 - improve our Websites; and

- provide more user friendly and customised websites and online services.

12.2 These features and technologies do not specifically identify you unless you otherwise provide personal information to us that enables identification. As such, information collected through these tracking technologies may be personal information.

Cookies

12.3 A 'cookie' is a small file stored on your computer's browser, which helps us better understand our users and assists us to deliver content via our Websites. We collect certain information via cookies, such as your device type, browser type, IP address, and pages you have accessed on our Websites.

12.4 Below are the main types of cookies we use a combination of:

Type of Cookie	How we use this Cookie
Session Cookies	Session cookies are used to track your movements from page to page. These cookies are usually erased when you close your web browser.
Persistent Cookies	Persistent cookies are stored on your device between browser sessions for a pre-defined amount of time. These cookies allow the site to remember your information or settings across the site. These cookies also enable targeted advertising.
Functional Cookies	Functional cookies remember information such as usernames or language settings and may allow the site to display important alerts. These cookies are not considered necessary, and can be blocked by the user, although this may impact how the site functions.
First party Cookies	First-party cookies are small data files stored on your device by our website. These cookies help improve your experience by remembering your preferences, enabling essential website functions, and providing insights into how you interact with our site. They are set and managed directly by the website you are browsing, ensuring a personalised browsing experience
Necessary Cookies	Necessary cookies are either session or persistent cookies, and are used to perform functions such as storing data and remembering you between pages. Similar to session cookies, these cookies are necessary for a number of functional features on our website.
Tracking and Social Cookies	Tracking and social cookies are either session or persistent cookies, but are not essential to the function of our website. These cookies help improve your experience by providing content relevant to you.

Tracking pixels

12.5 A tracking pixel is a piece of code that a business or third-party provider can place on its website or in email to collect information about a users' activity, including the site pages they visit time spent on each page, IP address, and/or form inputs (as relevant). When users visit pages with pixels, the pixel "loads" and send the information it is designed to collect back to the server of e.g. in the case of third-party pixels this would be to the third-party service provider.

12.6 Below are the main types of tracking pixels we may use a combination of:

Type of Pixel	How we use these Pixels
Retargeting Pixels	These are coded to monitor specific actions you make, such as which pages you visit, how much time you spend on each page, or how far you scrolled down a page. These help us understand our users' behaviour on our Websites.
Conversion Pixels	These are designed to track completed actions. When an action is completed it sends a signal back to the server. This data helps us understand how effective a particular webpage is at encouraging specific actions.
Analytical Pixels	These pixels collect a wide range of data, including page views, time spent on the site and visitor demographics
Email Tracking Pixels	We use these in email campaigns to track actions like email opens, link clicks and forwards. When you open an email, the pixel sends a signal back to the server, providing data that can help in understanding the effectiveness of email marketing strategies.
Affiliate Pixels	Affiliate pixels are used to track sales or leads generate through affiliate marketing. When a visitor clicks on an affiliate link and completes a specific action, the pixel fires, allowing the affiliate to earn a commission for the sale.

Opting out

- 12.7 If you do not wish to receive any cookies (other than those that are strictly necessary) you can change your web browser preferences to control how the browser deals with cookies. For example, depending on which browser your device uses, you may be able to disable certain third-party cookies. Please note that if you disable certain cookies, you may be unable to access certain pages or content on our Websites.
- 12.8 To change your web browser preferences, please visit the relevant preferences or settings page on your browser and amend the privacy settings in relation to cookies and site data. It may be necessary for you to opt out separately from each device and browser that you use to access online content.
- 12.9 We also use third-party service providers that may collect data related to your use of our online services through a suite of tracking technologies, such as third-party cookies, tracking pixels and web beacons, for analytic and/or marketing purposes.
- 12.10 These third party providers may update their policies and settings from time to time, so we encourage you to review their terms and policies for more information on their data collection practices and options available to you for managing your privacy. Please note that how these third parties handle and use your data is governed by their own privacy policies, not ours.
- 12.11 In addition to opting out of cookies via your browser as described at 12.7 and 12.8, you can opt out of the following third-party analytical tools we use via the instructions available at the links below:

Provider	Description
Meta Platforms Inc	If you use Facebook, Instagram, Threads or any other platforms or networks owned or used by Meta, you can generally adjust your 'ad preferences' in the account settings of the respective platform that you access and see ads in.
Alphabet Inc	If you use YouTube, Google or any other platforms owned by Alphabet, you can manage how tracking technologies are used by checking your browser or

account settings and adjusting your 'privacy & safety' and 'search personalisation' settings.

13. Do we use or share your personal information for direct marketing?

- 13.1 NPP Group's third party service providers (i.e. marketing agencies we use) may use and share your personal information for the direct marketing through various channels, such as via post, email, SMS, telephone or social media (through targeted advertisements on certain websites, mobile applications and social media channels).
- 13.2 Where you provide personal information to an NPP Group entity, we may share this personal information to another entity in the NPP Group and/or Burbank Group of Companies so that they may undertake direct marketing as set out in 13.1.
- 13.3 We will only send these communications in accordance with the Privacy Act (including Australian Privacy Principles 7) and the *Spam Act 2003* (Cth), and only where you have not opted out from receiving such communication from the relevant NPP Group entity.
- 13.4 You are always in control of the direct marketing communications which you receive from us and can opt-out at any time using the methods described at 12.7 to 12.11 and 13.5.
- 13.5 You can also visit Your Online choices and do a blanket opt out for the organisations who have signed up to Your Online Choices. When you opt out of receiving targeted ads, this information is usually saved on a cookie. This means that if you clear your cookies, you will have to opt out again.
- 13.6 Generally, you can opt-out by following the relevant opt-out or unsubscribe instructions in the relevant communication (such as email or SMS message). You can also contact us using the details set out in section 16 of this Privacy Policy to tell us you would like to stop receiving direct marketing communications from us.

Important points regarding opting out –

Importantly:

- 13.7 if you are a customer of or have signed-up, registered your interest or otherwise, with other entities in the Burbank Group of Companies, even if you opt out from receiving direct marketing communications from NPP Group, this will not mean you are opted out from receiving direct marketing communications from the other Burbank Group entity; and
- 13.8 regardless of whether you opt out from receiving any or all direct marketing communications, we will still communicate with you if required by law to provide you with information, or in relation to the property you are purchasing or other property-related services we are providing to you.

14. How do we store and protect your personal information?

- 14.1 We are committed to protecting your personal information and ensuring that we securely store any personal information we collect (in accordance with applicable privacy laws). We may hold your personal information in hard copy (paper) or electronic form.

- 14.2 NPP Group takes steps reasonable in the circumstances to ensure that the personal information it holds is accurate, complete, up-to-date and stored in a secure environment protected from misuse, interference and loss, and from unauthorised access, modification or disclosure.

Security and storage of personal information

Form	Explanation
Paper-based files	We store personal information in paper-based files in secure storage, and maintain physical security measures to ensure that such personal information is protected, such as physical locks on drawers and cabinets, and security systems at our premises. Paper files may also be archived in boxes and stored offsite in secure facilities.
Electronic records	Your personal information will be stored on databases held on servers located in a technologically secured environment, accessed only by authorised personnel or contractors (with login and password protection). We also maintain physical security measures in relation to storage of our electronic records (such as locks and security systems), and maintain computer and network security, by using firewalls, anti-virus software and other security systems to control access to our computer systems.
Our Websites and online payments	Our Websites use encryption and other technologies to ensure that your personal information is securely transmitted via the internet. We process payments using EFTPOS and online technologies. All transactions processed by us meet industry security standards to ensure payment details are protected.

How long do we keep your personal information?

- 14.3 We will only keep your personal information we store for as long as is necessary for the purposes set out in this Privacy Policy, or as required to comply with any applicable legal obligations.
- 14.4 When we no longer require (and in accordance with any applicable laws), we will take steps to delete, destroy or de-identify that information.

15. How can you access or seek correction of your personal information?

- 15.1 You are entitled to request access to any of your personal information held by NPP Group. To make such an access request, please contact us using the contact details below at section 16.
- 15.2 NPP Group takes reasonable steps to ensure the personal information it holds is accurate, up-to-date, complete, relevant and not misleading. You can help us to do this by letting us know if you notice errors or discrepancies in information we hold about you, and informing us of any change in your personal details.
- 15.3 In addition, under the Privacy Act, you have a right to seek access to and correction of your personal information that is collected and held by NPP Group. If at any time you consider any personal information we have about you is inaccurate, out of date, incomplete, irrelevant or misleading, you are entitled to request correction of that information using the contact

details in section 16. NPP Group will grant access to the extent required or authorised by the Privacy Act and will take reasonable steps to correct your personal information.

- 15.4 NPP Group will respond to your request within 30 days. We may decline your request to access or correct your personal information in certain circumstances in accordance with applicable privacy laws, however if we do so, we will provide you with written reasons for the refusal and details of complaint mechanisms.
- 15.5 If you are dissatisfied with NPP Group's refusal to grant access to, or correct, your personal information, you may complain to us using the contact details at section 16 below.

16. How can you contact NPP Group?

- 16.1 For further information or enquiries regarding your personal information, or if you would like to opt-out of receiving any promotional or marketing communications or make a privacy complaint, please contact us using any of the following details:

Contact NPP Group

Email	land@nationalpacific.com.au
Phone	1328782
Postal address	Privacy Officer National Pacific Properties Pty Ltd, 551 Spencer St, West Melbourne 3003

17. Privacy complaints and questions

- 17.1 If you have any questions or concerns about this Privacy Policy or how we have handled your personal information, you may contact us at any time using the relevant contact details set out above in section 16.
- 17.2 Please also contact us if you have a complaint about privacy. If you make a complaint about privacy, the following will occur:

No.	Step
1.	We will first consider your complaint to determine whether there are simple or immediate steps which can be taken to resolve the complaint. We will generally acknowledge your complaint within a week.
2.	If your complaint requires more detailed consideration or investigation: <ul style="list-style-type: none"> we will acknowledge receipt of your complaint within a week and endeavour to complete our investigation into your complaint promptly; and we may ask you to provide further information about your complaint and the outcome you are seeking. If your initial complaint was not written, we may ask you to submit your complaint in writing.
3.	We will then typically gather relevant facts, locate and review relevant documents and speak with the individuals involved.
4.	In most cases, we will respond to your complaint within 30 days from when we receive your complaint. If the matter is more complex or our investigation may take longer, we will let you know, and tell you when we expect to provide our response.



- 17.3 If you are not satisfied with our response to a complaint, or you consider that we may have breached the Privacy Act (including the Australian Privacy Principles), you are entitled to make a complaint to the Office of the Australian Information Commissioner (the Australian privacy regulator).
- 17.4 The Office of the Australian Information Commissioner can be contacted by telephone on 1300 363 992, or you can fill out this form to make a complaint about our handling of your personal information. Full contact details for the Office of the Australian Information Commissioner can be found online at www.oaic.gov.au.
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Annexure A – Developments

No.	Name of Development	Special Purpose Vehicle (if relevant)
1.	Eliston	National Pacific Properties Australia Twyford Road Pty Ltd
2.	Bella	National Pacific Properties Bellfield Pty Ltd