



Privacy Policy

In this policy, "**Walker**" means Walker Corporation Pty Limited (ACN 001 176 263) as trustee for the L A Walker Family Trust (ABN 92 134 623 291), Walker Group Holdings Pty Limited (ACN 001 215 069) and all their respective Australian domiciled controlled and related entities.

Your privacy is important to us

Walker has always valued the privacy of personal information. We are bound by the Privacy Act 1988 (Cth) (Privacy Act), the Australian Privacy Principles (APPs) and the privacy provisions of other applicable legislation. We have also taken steps to ensure that, if you tell us you are located in the European Union, we will seek to give you the protections available to you under the General Data Protection Regulation (GDPR). Together we refer to these pieces of legislation as Privacy Laws.

The Privacy Laws set out standards to be met in the collection, use, disclosure and handling of personal information. It is designed to protect the privacy of individuals by regulating the way personal information is managed.

This policy has been developed to comply with the Privacy Laws, and outlines how we manage the personal information we collect, hold, use and disclose. Any personal information collected by us is covered by this policy and it applies to all of our divisions and organisations, including our trading and business entities.

By accessing our websites or using our services, you consent to the collection, use and processing of your personal information in accordance with this privacy policy.

What kind of personal information do we collect?

We may collect and hold personal information about:

- respective and prospective customers, clients, tenants and suppliers;
- job applicants, employees, and contractors; and
- other people who may come into contact with Walker or one of its associated companies within the group.

The type of personal information we may collect and hold includes (but is not limited to):

- Identity information: your name, address, telephone number, email address, gender, business title, date and place of birth, image, employment, nationality, drivers licence, passport and visa details;
- Payment information: your credit card details, account details and credit or reward programs you use in relation to your transactions with Walker;
- Travel information: your travel information, such as your arrival and departure date, flight and transport details;
- Service information: information relating to your stay at or use of our facilities, including what goods and services you use, special requests, information collected through the use of closed circuit television, and your use of Walker website as well as our internet, phone and other technology services;
- Marketing information: information you provide when you participate in promotions, surveys, contests or other marketing activities;
- Referral information: how you heard about Walker.

This information may be obtained by way of telephone, Internet enquiries or forms filled out by such individuals, face to face meetings, interviews, and telephone conversations, either from the relevant individual or from a third party (providing that the third party confirms that have permission to disclose the information to us in this way).

If someone other than you provides us with personal information about you that we did not ask for and we determine that we could have collected this information from you had we asked for it, we will notify you, as soon as practicable. This notice will be given unless to do so would be in breach of an obligation of confidence. If we could not have collected this personal information, we will lawfully de identify or destroy that personal information.

We may ask for other information voluntarily from time to time (for example, through market research or surveys) to enable us to improve our service or consider the wider needs of our customers or potential customers. We also collect information based on how you use our online services, such as our websites, including through the use of cookies.

Cookies

When you visit our websites, the server may attach a "cookie" to your computer's memory. A "cookie" assists us to store information on how visitors to our websites use it and the pages that may be of most interest. This information may be used to provide users of your computer with information that we think may interest the users of your computer. However, this information is not linked to any personal information you may provide and cannot be used to identify you. If you choose, you should be able to configure your computer so that it disables "cookies" or does not accept them.

Like many website operators, we may also engage third party tracking services such as Google Analytics, which use cookies, beacons and other web-based tracking tools to analyse and help us improve the activities on our website. Google may use this information to analyse how users interact with our website, compile statistical usage reports and providing other services in relation to website and internet activity. Google provides further information on its analytics and how to opt out here.

How do we hold and use personal information?

We hold personal information in a combination of secure computer storage facilities (including online) and paper based files and other records.

The purposes for which we collect, hold, use, disclose and otherwise process personal information are:

- to deliver, administer and improve our products and services;
- to understand and meet your needs and provide the services and products our group of companies may offer;
- to be able to develop and identify projects and services that may interest people;
- to conduct market or customer satisfaction research;
- to develop, establish and administer alliances and other arrangements with other organisations in relation to promotion, administration and use of our respective products and services;
- to market our products, services and property developments to existing and potential clients – you can option of receiving marketing materials from us at any time;
- to provide products or services that have been requested, and to facilitate services on your behalf where requested;

- to help us manage and enhance our products and services, including by analysing future customer needs and providing a more personalised service experience;
- to communicate with clients and potential customers;
- to assess the suitability of prospective tenants and buyers of property;
- to provide ongoing information about our products and services to people that we believe may be interested;
- to comply with legal and regulatory obligations; and
- to recruit employees and contractors.

To whom may personal information be disclosed?

We may disclose your personal information with your consent, for the purposes for which that information was collected or related or compatible purposes which are reasonable to expect, or where required by law.

Like most service providers, in the course of our business we may also disclose your personal information to third parties, including:

- real estate agents who assist in us in providing services to you;
- third party service providers, agents and suppliers to whom we outsource performance of certain functions and services, and who assist us in delivering our services to you;
- our related entities, and other divisions or organisations within our company group;
- joint venture/alliance partners who may wish to communicate with you about their services, products or promotional opportunities which may be of advantage to you, unless you tell us not to;
- service providers and specialist advisers who have been contracted to provide administrative, financial, research or other services to us;
- insurers, credit providers, courts, tribunals and regulatory authorities as agreed or authorised by law;
- credit reporting, reference agencies or insurance investigators; or
- anyone authorised by you.

We require that organisations outside Walker that handle or obtain your personal information as service providers to us comply with Privacy Laws (as applicable) and this policy. We also require that these organisations use your personal information only for our purposes, take appropriate steps to secure and protect your information and otherwise follow our reasonable directions with respect to that information.

You do not need to provide us with your personal information if you do not want to, and you can choose to interact with us on an anonymous basis. However, in some cases, if you do not provide the personal information requested, we or those involved with the provision of the service or product may not be able to provide the appropriate type or level of service or product you require.

Overseas disclosure

We may transfer to people in foreign countries any of your personal information to fulfil the purposes set out in this privacy policy. In many cases the transfer will be necessary for the performance of our contract with you or for the implementation of measures taken in response to a request by you or for the performance of a contract with a third party which is concluded in your interests. When we transfer your personal information to third parties overseas, we require that they comply with Privacy Laws.

Third party websites

From time to time our websites may link directly to websites operated by third parties (Linked Sites).

You acknowledge that Linked Sites are not operated by us. We encourage you to always read the applicable privacy policy of any Linked Site on entering the Linked Site. We are not responsible for the content or practices of the Linked Sites nor their privacy policies regarding the collection, storage, use and disclosure of your personal information.

Sensitive information is subject to greater restrictions

Some personal information that we collect may be 'sensitive'. Sensitive information includes but is not limited to information about a person's racial or ethnic origin, religion, membership of political bodies or trade unions, sexual preferences or activities, criminal record and health information.

The way we use tax file numbers and information received from a credit reporting agency about an individual is also restricted by law.

Sensitive information, specifically health information, may be relevant to applications by prospective employees and to the provision of our services. We will seek your consent in collecting sensitive information. You do not have to provide this information to us but without it, we may not be able to provide some services to you or, adequately assess candidates' suitability for some employment positions.

The Privacy Laws require that sensitive information is used and disclosed only for the purposes for which it is provided, or a directly related or compatible secondary purpose, unless the relevant individual agrees otherwise or for other specific reasons such as if the use or disclosure of this information is required by law (for example, to prevent a crime or serious injury).

Management of personal information

We have appointed a National Privacy Compliance Officer to oversee our management of personal information in accordance with this policy and the Privacy Laws. We have also a representative in the European Union. Their contact details are set out at the end of this policy.

Security and storage of your personal information

Safeguarding the privacy of your personal information is important to us and we endeavour to protect any personal information whether people interact with us personally, by telephone, mail, over the Internet or other electronic media. We take steps to protect the personal information we hold from misuse, loss, unauthorised access, modification or disclosure. Some of the ways we achieve this are:

- confidentiality requirements on our employees;
- policies on document storage security;
- security measures for access to our systems and premises;
- only providing access to personal information once proper identification has been given;
- controlling access to our premises; and
- website protection measures.



The Privacy Laws also require us not to store personal information longer than necessary. Where we no longer require any personal information that we hold, that personal information is destroyed or details which may identify individuals to be removed.

Data breach

Notwithstanding the reasonable steps take to keep your information secure, breaches may occur. In the event of a security incident, we have procedures in place to promptly investigate the incident and determine if there has been a data breach involving personal information and if so, to assess whether the breach requires notification. If so, we will notify the relevant authorities and affected individuals in accordance with Privacy Laws.

What we expect of you

When you provide us with personal information about other individuals, we rely on you to make them aware that you will or may provide their information to us, the types of third parties we may disclose to it, the relevant purposes we and the third parties we disclose it to will use it for, and how they can access it (as described in this document). If you provide us with personal information in respect of another person, you warrant that you are authorised to do so for the purposes set out in this privacy policy. If you have not done these things, you must tell us before you provide the relevant information.

If you collect, use disclose or handle personal information on our behalf or receive it from us, you and your representatives must meet the relevant requirements of the Privacy Laws and only use and disclose it for the purposes we agree to.

How do we keep personal information accurate and up-to-date?

We will take reasonable steps to ensure that your personal information is accurate, complete and up to date whenever we collect, disclose or use it. If you suspect that the personal information we hold about you is inaccurate, we encourage you to contact us as soon as possible and to notify us when there are changes in your contact details and personal circumstances. Our contact details are set out at the end of this policy.

Even if you do not contact us to correct your personal information, if we are satisfied that, having regard to the reasons for which we hold your personal information, that personal information is inaccurate, incomplete, out-of-date, irrelevant or misleading, we may take reasonable steps to correct that information.

You have the right to access the personal information about you held by us

Under the Privacy Laws, you have the right to access any personal information which we hold about you and to advise us of any perceived inaccuracy. However, there are limitations on this right. Access may be restricted where it adversely affects the rights or freedoms of others, or one of the following APP exceptions applies:

- access would pose a serious threat to the life or health of any individual;
- access would have an unreasonable impact on the privacy of others;
- a frivolous or vexatious request;
- the information relates to commercially sensitive decision-making process;
- access would be unlawful or denying access is required or authorised by law;
- access would be prejudice enforcement activities relating to criminal activities and other breaches of law, public revenue, a security function, or negotiations with the individual; and
- the information relates to legal dispute resolution proceedings.

If we refuse you access to your personal information, we will let you know the reasons for our refusal in writing.

To make a request to access personal information we hold about you, please contact us in writing using the contact details below. We will require you to verify your identity and to specify what information you require. We may charge a fee to cover the cost of verifying the application and locating, retrieving, reviewing and copying any material requested. If the information sought is extensive, we will advise the likely cost in advance and can help to refine your request if required.

Are you located in the European Union?

If you are located in the European Union, GDPR provides for additional rights in relation to your personal information that we process. We take these rights into account when processing your personal information, including:

- **Erasure:** You have the right to request that we delete the personal information we hold about you in certain circumstances, including but not limited to circumstances where the information is no longer required. However, we are not obliged to delete if where retention is required to comply with a legal obligation, for the exercise of legal claims.
- **Objection:** Depending on the circumstances in which we collected your personal information, you may have the right to object to our processing of your personal information. Where this occurs, we will cease processing your personal information (particularly where it relates to direct marketing), unless we can demonstrate an overriding legitimate basis for the processing.
- **Portability:** Depending on the circumstances, you have the right to receive and have transmitted to other data controllers any personal information we hold in a commonly used and machine-readable format, where technically feasible.
- **Restriction:** You have the right to restrict our processing of your personal information in certain circumstances, including where the accuracy of the information is contested, the processing is unlawful or the information is no longer required.
- **Review:** Unless necessary for the purpose of performing a contract between us, authorised by law or otherwise explicitly consented to by you, you can exercise your right not to be subject to decisions based on automated processing (such as online profiling).
- **Withdrawal:** Where we process your personal information based on your consent, you have a right to withdraw that consent at any time. You can withdraw consent online, via your Walker account (if you have one) or by contacting our National Privacy Compliance officers, whose details are set out at the end of this policy.

What if you have a complaint?

If you consider that any of our actions breaches this privacy policy or the Privacy Laws, or if you have any other complaint or enquiry about how we handle personal information, you can contact us through one of the contacts below. We will endeavour to act promptly in response to a complaint.

If you are not satisfied with our response to your complaint, you can contact the relevant regulator:

Australia: Office of the Australian Information Commissioner
1300 363 992

Europe: Please contact your local Member State supervisory authority

How to contact us

To contact us about a privacy related issue by e-mail, phone, facsimile or post:

Attention: National Privacy Compliance officer
Email: PrivacyComplianceOfficer@walkercorp.com.au
Phone: (02) 8273 9600
Facsimile: (02) 9252 7400
Postal Address: GPO Box 4073, Sydney, NSW, 2001

Updates to this policy

Walker reserves the right to review this privacy policy at any time to take account of new laws, technology, changes to our operations and work practices and the business environment. Amendments will be incorporated into this privacy policy.