

Privacy Policy

Your privacy is important to us and we are committed to complying with the *Privacy Act 1988* (Cth) in relation to the handling of your Personal Information. In this privacy policy (“**Privacy Policy**”), “**we**”, “**us**” and “**our**” means CDC (ACT) Pty Limited, its agents, affiliates and assigns. Please read this Privacy Policy carefully as it describes how we collect, use and handle your Personal Information.

You are under no obligation to provide us with the Personal Information we request. However, if you fail to provide such requested Personal Information it is likely that certain features, functions, information, products and/or services that may be provided or available through or via the CQ Tenant Portal located at portal.cqcanberra.com.au (“**Portal**”) may not be available to you (those, features, functions, information, products and/or services, being the “**Services**”). As an alternative to not providing Personal Information, you may request that you remain anonymous, or choose a pseudonym, when dealing with us. To the extent that it is lawful and practicable to do so we will agree to such a request.

By accessing or using the Portal on any computer, mobile phone, tablet, console or other device (each, being a **Device**) you acknowledge that you have read and consented to this Privacy Policy. In this Privacy Policy all terms are given the meaning as provided in the *Privacy Act 1988* (Cth), unless otherwise defined in this Privacy Policy or our [Terms of Use](#).

1. Types of Personal Information we collect on the Portal

The types of Personal Information we collect depends on your interaction with, and use of, the Portal. Generally, the types of Personal Information we collect includes (without limitation):

- name;
- usernames;
- email address;
- telephone number;
- occupation and organisation you work for; and
- purchasing preferences and financial details.

2. Collection of Personal Information

Where it is reasonable and practicable to do so, we will collect Personal Information directly from you (including when you input Personal Information into or via the Portal or when you access or engage the Services). We may also collect Personal Information from third parties (such as information that is on the public record or which is otherwise non-solicited).

To best serve you, we may combine or collate your Personal Information with other non-personal information that is publicly available and/or non-personal information that we receive from reputable third party sources.

We generally only collect, use, disclose or hold Personal Information that is reasonably necessary for us to provide, operate, maintain and support the Portal and the Services (the “**primary purpose**”). When we collect your Personal Information, your Personal Information will only be used or disclosed for the primary purpose for which it was collected, a related secondary purpose, in accordance with any consent you grant us or as otherwise lawfully required (e.g. where your Personal Information is requested by a law enforcement agency).

3. Use of Personal Information

We collect Personal Information that allows us to fulfil the primary purpose, including to:

- provide you with access and use of the Portal and the Services;
- provide you with support or other assistance with login or use of the Portal;
- send you email updates, announcements and/or notifications in relation to upcoming Amalgamated Property Group developments, benefits, certain benefits or discounts on behalf of your organization, booking details regarding your booking of the business centre or local Canberra information;
- process bookings of the business centre located in Civic Quarter (“**Bookings**”) and, if applicable, provide receipts in respect of any Bookings you make; and
- request feedback on the operation and functionality of the Portal in order to develop enhancements or rectify problems with the Portal.

We do not share, rent or sell your Personal Information to third parties except as contemplated in this Privacy Policy.

4. Disclosure of your Personal Information

We may disclose your Personal Information to third parties where reasonably required to fulfil the primary purpose. These third parties may include (without limitation):

- our booking platform provider: we may disclose your Personal Information to Skedda Pty Ltd to enable you to make, view and perform certain actions permitted by the Portal in relation Bookings;
- our payment services third party service provider: we may disclose your Personal Information to Stripe Payments Australia Pty Limited (together, “**Stripe**”) to enable Stripe to provide payment services in connection with Bookings;
- law enforcement and emergency services agencies: we may disclose your Personal Information where required or authorized to do so by law, including in emergency situations and to assist law enforcement agencies with active investigations. We will always try to ensure that those to whom we disclose your Personal Information have the legal right to receive it; and
- other organizations: to prevent illegal uses of Services, or to defend ourselves against third-party claims.

Where we disclose Personal Information to third parties, we will inform such persons of the purposes for which such personal information is permitted to be used, as described in this Privacy Policy.

We may use or disclose your Personal Information to a third party for the secondary purpose of direct marketing communication, if:

- we collected the information from you;
- you would reasonably expect your Personal Information would be used or disclosed for direct marketing;
- we have provided a simple means by which you can request not to receive direct marketing; and
- you have not made a request not to receive direct marketing.

Where you would not reasonably expect your Personal Information to be used for direct marketing, or the information has been collected from a third party, we may use the information for the secondary purpose of direct marketing communication only where:

- you have consented to the use or disclosure for direct marketing;
- you have not made a request to us not to receive direct marketing communication;
- in each direct marketing communication, we always prominently display a simple notice or actionable option that you may express a wish not to receive any further direct marketing communication; and

- each written direct marketing communication by us with you sets out our contact details.

5. Disclosure to overseas recipients

Generally we do not disclose your Personal Information to overseas recipients.

6. Our use of Cookies and web beacons

We may collect analytical information related to your use of the Services, such as the frequency and number of visits to the Portal, frequency, number and spend of bookings and other matters related to your general usage of the Portal or Services. We may use the aggregated data collected through our analytical tools to improve our Services.

When you use the Services, we may collect information from your Device through a "cookie". A "cookie" is a small alphanumeric file that our website or app sends to your Device's hard drive while you are viewing our website or app for record keeping purposes. A "cookie" can be either a session cookie (disappears when the web browser or app is closed) or persistent cookie (remains on the hard drive until a set expiration date). We may use both session cookies and persistent cookies as part of our Services.

If you do not wish to receive any cookies you may set your browser to refuse cookies. If you refuse our cookies, some features of our Services may not function properly.

Our payment services third party service providers may also collect analytical information about the Services (including your use of the Services), including on an anonymized basis.

7. Access to and correction of your Personal Information

You should endeavor to notify us if your Personal information is no longer accurate, complete or up to date.

If you have wish to access or correct your Personal Information, make a complaint or otherwise have questions about this Privacy Policy please contact us as follows:

Civic Quarter Concierge
02 5110 3105
Ground Floor, 68 Northbourne Avenue, Canberra ACT 2601
conciierge@cqcanberra.com.au

If you are requesting access or correction of your Personal Information please provide adequate details that identify what information you want access to or corrected.

If you are making a complaint regarding your Personal Information please provide as much detail as possible in relation to your complaint in order to assist us with our internal inquiries. We will acknowledge receipt of your complaint in writing, investigate the complaint and respond to your complaint within a reasonable time after acknowledgement, subject to the complexity of our investigation. If you are dissatisfied with our response to your complaint and believe that we may have breached applicable Australian privacy laws you may refer your complaint to the Australian Information (Privacy) Commissioner.

8. Routines regarding deletion of Personal Information

We retain users' Personal Information for no longer than such period as is necessary to fulfil the purpose(s) for which it was collected and to comply with applicable laws. When a user's Personal Information is no longer required for the purposes for which it was collected or required to be retained

under applicable law, such personal information shall be erased or de-identified so that it is no longer personally identifying information.

9. Third party websites

Users of the Portal may find advertising or other content on the Portal that link to the sites and services of our partners, suppliers, advertisers, sponsors, licensors and other third parties. We do not control the content or links that appear on these sites and are not responsible for the practices employed by websites linked to or from our Site. In addition, these sites or services, including their content and links, may be constantly changing. These sites and services may have their own privacy policies and customer service policies. Browsing and interaction on any other website, including websites which have a link to the Portal, is subject to that website's own terms and policies.

10. Changes to this Privacy Policy

We may amend this Privacy Policy from time to time by posting the amended version on the Portal. Subsequent or continuing use of the Portal will constitute acceptance of any changes.

Where there are material changes to this Privacy Policy that could in our reasonable opinion adversely affect you, we will notify you of the changes (which, for these purposes, may include notification when a you log on to use the Portal or an email sent to your email address provided to us). If you do not agree to such changes, you must discontinue your access and use of the Portal and the Services.

If any part of the Privacy Policy is or becomes void, it will not affect the validity and enforceability of the remaining provisions. The void part will be replaced by provisions that are valid and have an effect as close as possible to the effect of the void part.