

Privacy Policy - Australia and New Zealand

Last updated March 2023

UniLodge Australia Pty Ltd (ACN 078 921 169), Essence Communities Pty Ltd (ACN 639 534 740) and their Related Bodies Corporate (collectively **UniLodge**)

In this Privacy Policy, the expressions **UniLodge**, **we**, **us** and **our** refer to UniLodge Australia Pty Ltd (ACN 078 921 169), Essence Communities PTY Ltd (ACN 639 534 740) and their Related Bodies Corporate (as defined by the provisions of the Australian *Corporations Act 2001* (Cth)).

We comply with the Australian Privacy Principles and the *Privacy Act 1988* (Cth) and, as applicable, the New Zealand *Privacy Act 2020* (together, **Privacy Law**). The Privacy Law governs the way private sector organisations collect, use, keep secure and disclose **personal information** (as defined in **Section 1**).

If you are a resident of the European Union and we collect **personal data** from you, then we are required to comply with the **GDPR** (these bolded terms are defined in **Section 12.5**).

The purpose of this Privacy Policy is to generally inform people of:

- how and when we collect personal information and personal data;
- how we use and disclose personal information and personal data;
- how we keep personal information and personal data secure, accurate and up-to-date;
- how you (as an individual) can access and correct your personal information and personal data; and
- how we will facilitate or resolve a privacy complaint.

If you have any concerns or complaints about the manner in which your personal information and personal data has been collected, used or disclosed by us, we have put in place an effective mechanism and procedure for you to contact us so that we can attempt to resolve the issue or complaint. Please see **Section 12** for further details.

If you have any concerns or questions, please contact us at info@Unilodge.com.au or write to us at GPO Box 2481, Brisbane, Qld, 4001, Australia and our group privacy officer will then try to resolve the issue.

We recommend that you keep this information for future reference.

1. What is personal information?

“Personal information” means any 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.

2. The kinds of personal information or personal data collected, used and disclosed by UniLodge

We will only use or disclose your personal information or personal data for the primary purposes for which it was collected or as consented to by you.

At or around the time we collect personal information or personal data from you, we will endeavour to provide you with a notice which details how we will use and disclose that specific information.

We set out some common collection, use and disclosure instances in the table below.

Purpose	Type of Information	Uses	Disclosures
Enquiries about investment or sales	<p>Information collected when you purchase our products or request information about the products and services we offer (e.g. investment opportunities with UniLodge, residency, or the purchase of our furniture and appliances packages and other products), including where applicable:</p> <ul style="list-style-type: none"> • Contact information: Such as your name, Company name, address, billing address (if different to address), email address, phone numbers. • Transaction Sales: Such as: <ul style="list-style-type: none"> - Delivery information. - Billing and account details. - Payment card details. • Customer Service: Information collected by our customer services department. • Management Authority: the personal information or personal data required to complete our Management Authority documentation for investors, including your banking and insurance details. 	<p>The types of uses we will make of personal information or personal data collected for this type of purpose include:</p> <ul style="list-style-type: none"> • Identity verification: if required, the verification of your identity. • Services: the provision of our services to you including: <ul style="list-style-type: none"> - Using your personal information or personal data in order for you to use the products and services offered. - Payment processing, including charging, credit card authorisation, verification and debt collection. - Checks for financial standing and credit-worthiness. - To provide customer service functions, including handling customer enquiries and complaints and managing investor properties. • General administrative use: <ul style="list-style-type: none"> - The use for the administration and management of UniLodge. - The maintenance and development of our products and services, business systems and infrastructure. - In connection with the sale of any part of UniLodge's business or a company owned by a UniLodge entity. - To provide customer services to clients and for quality assurance purposes. 	<p>The types of disclosures we will make of personal information or personal data collected for the type of purposes listed include, without limitation, to:</p> <ul style="list-style-type: none"> • Third parties connected with the sales process including ecommerce, product suppliers, payment gateway providers and financial institutions. • Service providers (including IT service providers and consultants) who assist UniLodge in providing our products and services. • Related bodies corporate of UniLodge (including related entities). • For investors: any applicable owner corporations, body corporate groups and city councils. • Third parties in connection with the sale of any part of UniLodge's business or a company owned by a UniLodge entity. • As required or authorised by law.

Purpose	Type of Information	Uses	Disclosures
Residents	<ul style="list-style-type: none"> • Contact and identifying information: <ul style="list-style-type: none"> - Such as your name, date of birth, address, billing address, email address, phone and fax numbers, nationality, gender. - Alternative Contact (parents or guardian's names, address and phone number, emergency contact details). - Bank account, online payments system, credit or debit card details. - Details of required primary identification information (such as a current drivers licence, passport, etc). • Visa information • Medical conditions • Background and immigration check: information obtained from you or third parties to perform background checks, details of your residency status or visas. • Enrolment information: such as your university course information and student number, confirmation of enrolment and a receipt from your university confirming your tuition fees have been paid. • Previous tenancies: If you are a non-student applicant, details of your previous residential tenancy arrangements including the landlord/letting agent's contact information, your tenancy period, and whether your security deposit/ bond was refunded in full (including reasons, if any). 	<ul style="list-style-type: none"> • Identity verification: if required, the verification of your identity and proof of residency and student status in Australia or New Zealand (as applicable). • Resident Application: the consideration and processing of your accommodation application and associated lease and bond documentation. • Term of residency: to conduct room inspections and collect personal belongings from the premises at the end of your residency, and to ensure the safety of all residents at any given time. • Resident activities and events: collection of your personal information or personal data to facilitate your participation in UniLodge's various resident activities and events, including the Residential Life Program, where applicable. • Payments and purchases: The processing of any payments and refunds, credit card authorisations, verifications and debt collection, if applicable. • General administrative and security use: <ul style="list-style-type: none"> - The use for security and safety purposes, including the use of your details in a medical emergency or as lawfully directed or required by a government body. - The use for the administration and management of UniLodge. - The maintenance and development of our products and services, business systems and infrastructure. - In connection with the sale of any part of UniLodge's business or a company owned by a UniLodge entity. • To provide customer services to clients and for quality assurance purposes. 	<p>We may disclose this type of personal information or personal data to:</p> <ul style="list-style-type: none"> • Our contractors, agents and third party providers who undertake billing, credit, caretaker, security, maintenance and utilities services on our behalf. • Investors in the property that you are leasing from us. • Third party providers who assist us in providing our products and services to you. • Your previous landlord/letting agent, for the purposes of conducting a reference check and verifying your residential letting history. • Third parties, such as external debt recovery agents, court or other entities to which we are required by law to disclose personal information or personal data. • Government and regulatory authorities such as health authorities or agencies, the applicable residential tenancies tribunal (such as the Victorian Civil and Administrative Tribunal) or the Disputes Tribunal of New Zealand, Australian, New Zealand and overseas education departments, the Australian Department of Home Affairs or Immigration New Zealand, or the relevant police authority to conduct criminal checks.

Purpose	Type of Information	Uses	Disclosures
Resident wellness check service or Curfew compliance (U18 international students)	<ul style="list-style-type: none"> • General location: If you are a resident under age 18, or if you (of any age) become subject to a mandatory quarantine or isolation order, a flag as to whether your mobile device's GPS location has been detected as being located inside or outside of your residence during relevant curfew hours. • Wellness indicators from your Internet or mobile device usage patterns, including: <ul style="list-style-type: none"> - an alert from our Internet service provider or your mobile device regarding a significant reduction in your level of WiFi or mobile network use; - a significant change in the number or frequency of your interactions with the Residential Life mobile app; - level of battery power of the phone. <p>Note: UniLodge is not supplied with, and does not have access to, any details of your actual network usage or to the Internet websites that you visit or the content that you may have accessed.]</p>	<ul style="list-style-type: none"> • Curfew or wellness assurance: Where you— <ul style="list-style-type: none"> - are a resident under age 18 and the conditions of your academic study program or student visa mandate that you comply with a curfew; or - are an Australian resident or an overseas student resident who is age 18 or over, and have voluntarily agreed to participate in our resident welfare monitoring service (your participation in this service is optional and may require use of a separate mobile app); or - are required by law or regulation to isolate or quarantine for a period of time in your residence or another place owned or controlled by us, <p>then we will use these types of information to (as applicable) to:</p> <ul style="list-style-type: none"> - assist you to comply with your approved accommodation arrangements and mandatory curfew obligations, where applicable; - periodically check your wellness, including by sending a wellness check alert to your mobile device or detecting and using that data (without any knowledge of the content of your device interactions) to schedule an in person wellness check; - monitor your conformance with your legal obligations regarding your curfew, isolation or quarantine requirements (as applicable). 	<p>We may disclose your wellness check result or details of your non-compliance with your curfew, isolation or quarantine requirements (as applicable):</p> <ul style="list-style-type: none"> - to your university or other educational provider; - to government and regulatory authorities (including Commonwealth or State health authorities or agencies), as above for "Residents"; or - as required or authorised by law.

Purpose	Type of Information	Uses	Disclosures
Marketing, testimonials, surveys and competitions	<ul style="list-style-type: none"> • Contact information: Such as your name, email address, current postal and residential addresses, phone numbers, country of residence (and, if applicable, age). • Website enquiries: Such as your name, email address, phone number and any information you provide to us as part of your message. • Social media activity: Including “likes”, comments posted, any of your oppositions or feedback, photos posted or uploaded and other information pertaining to your social media activities which concern, or relate, to UniLodge. • Competitions and surveys: Any personal information or personal data you include in any survey answers or competition entries you send to us. • Contact details and testimonials: If you agree to be engaged for testimonial purposes for inclusion in our promotional material, your photograph, name, testimonial and any other personal information or personal data you disclose on our Consent to Release Image or Recording Form and in any recordings themselves. 	<ul style="list-style-type: none"> • General marketing, surveys and consumer analytics: Using your personal information or personal data: <ul style="list-style-type: none"> - To aggregate with other information and to then use it for marketing and consumer analytics. - To offer you updates on products, events or information that may be of interest to you. - For Marketing and promotional activities by us (including by direct mail, SMS and email) such as our email alerts, product awareness information and newsletters. • Competitions <ul style="list-style-type: none"> - To facilitate your participation in our competitions. - To offer you updates on products, events or information that may be of interest to you. • Online accounts or social media: If you participate in our social media platforms (such as Facebook) and you provide us with your personal information or personal data, we will use it for: <ul style="list-style-type: none"> - Adding account holders to the marketing database. - Customer service related contact. - Responding to social media messages. - Fulfilling social media platform rules. 	<ul style="list-style-type: none"> • We may disclose your personal information or personal data to third parties connected with the marketing process who assist us in providing our products and services to you. • All other personal information or personal data you provide to us as part of your engagement may be disclosed as follows: <ul style="list-style-type: none"> - Service providers (including IT service providers and consultants) who assist UniLodge in providing our products and services. - Related bodies corporate of UniLodge (including related entities). - Third parties in connection with the sale of any part of UniLodge’s business or a company owned by a UniLodge’s entity. • We will also disclose your personal information or personal data as required or authorised by law.

Purpose	Type of Information	Uses	Disclosures
Human resources	<ul style="list-style-type: none"> • Contact information: Such as your name, e-mail address, current postal and residential address, phone numbers, next of kin contact details. • Employee record information • Identifying information: Such as your gender, nationality, photo, passport or birth certificate, residency details, date of birth. • CV, resume or application related information: Such as the details provided in your resume or CV, your eligibility to work in Australia or New Zealand (as applicable), your education, previous employment details, professional memberships or trade qualifications. • Tax, superannuation and payroll information: Such as your Tax File Number and ATO Declaration, New Zealand IRD number, Superannuation/KiwiSaver details and financial institution details. • Background check information: Information obtained from you or third parties to perform background checks. • Medical or health information: Information you voluntarily provide to us in relation to your capacity to undertake your role or such other information which may be related to an incident which has occurred during the course of your employment. • Performance related information: Pre-employment testing and other information collected by UniLodge's systems in the course of the employee or contractor's engagement with UniLodge. • Information collected from referees • Security information: Such as CCTV footage and photographs taken on our premises. 	<ul style="list-style-type: none"> • Background check information: Utilising the information collected for the purpose of assessing candidate suitability for role, including by obtaining: <ul style="list-style-type: none"> - Verification of your identity and age. - Criminal history check in Australia or New Zealand (as applicable). - Background checks including publically available information including LinkedIn or other social media platforms. - Working with Children checks in Australia or New Zealand (as applicable). - Confirmation of eligibility to work in Australia or New Zealand (as applicable). - Confirmation of education and qualifications. - Confirmation of previous employment. - Consideration regarding medical leave. • Administration and performance monitoring use: Utilising the information collected for the purpose of: <ul style="list-style-type: none"> - Dealings related to the employer/employee relationship or the contractor/principal relationship (as the case may be). - Use of such information whether or not the employment or contractor relationship is prospective, current or past. - Use of such information to monitor systems, performance and time usage and internet usage. - The use of your personal information or personal data collected in the administration and management of UniLodge. - In connection with the sale of any part of UniLodge's business or a company owned by a UniLodge entity. 	<p>We may disclose your personal information or personal data to:</p> <ul style="list-style-type: none"> • Relevant superannuation company/KiwiSaver provider. • Government agencies, including but not limited to The Australian Taxation Office, Centrelink and Child Support Agency, the New Zealand IRD and the New Zealand Ministry of Social Development. • Relevant Worker's Compensation organisation (e.g. WorkCover etc) or, in New Zealand, ACC. • Third party referees provided by you in connection with an application made to UniLodge. • Service providers (including IT service providers and payroll providers), if any. • Recruitment agents used in connection with your application with us. • Third parties in connection with the sale of any part of UniLodge's business or a company owned by a UniLodge entity. • Third party parties in connection with obtaining any background checks, pre-employment screening. • Financial institutions for payroll purposes. • As required or authorised by law.

Purpose	Type of Information	Uses	Disclosures
Investors and owners	<ul style="list-style-type: none"> • Contact and identifying information: <ul style="list-style-type: none"> - Such as your name, date of birth, address, billing address, email address, phone and fax numbers. - Bank account, credit or debit card details. - Details of required primary identification information (such as a current drivers licence, passport, etc). • Transaction Sales: Such as: <ul style="list-style-type: none"> - Delivery information. - Billing and account details. - Payment card details. • Customer Service: Information collected in connection by our customer services department. 	<ul style="list-style-type: none"> • Investor Application: using your personal information or personal data to consider and process your application to become a UniLodge investor, and to process payments should your application be successful. 	<ul style="list-style-type: none"> • Third parties connected with the marketing process who assist us in providing our products and services to you. • Third parties that assist with our mailing list distribution. • The parties listed in the Disclosure column for "<i>Enquiries about investment and sales</i>".

3. How UniLodge collects and holds personal information or personal data

3.1 Collection generally

As much as possible or unless provided otherwise in this Privacy Policy or a notification, we will collect your personal information or personal data directly from you.

When you engage in certain activities, such as by submitting an online enquiry or participating in one of our surveys, we may ask you to provide certain information. It is completely optional for you to engage in these activities.

Depending upon the reason for requiring the information, some of the information we ask you to provide may be identified as mandatory or voluntary. If you do not provide the mandatory information or any other information we require in order for us to provide our products or services to you, we may be unable to provide our products or services to you in an effective manner, or at all.

3.2 Other collection types

We may also collect personal information or personal data about you from other sources, such as your previous landlords or letting agents, other referees, government agencies and other third parties. Some examples of these alternative collection events are:

- (a) if you are under age 18, when we collect personal information or personal data about you from your parent/custodian or relative;
- (b) if you are a non-student applicant, your previous landlord/s or letting agent/s;
- (c) when we collect personal information or personal data about you if we are required to conduct a personal criminal check, credit check or personal referee checks; or
- (d) when we collect personal information or personal data about you from publicly available sources including but not limited to, court judgments, directorship and bankruptcy searches, Australia Post or New Zealand Post (as applicable), White Pages directory, and social media platforms (such as Facebook, Twitter, Google, Instagram, LinkedIn etc).

3.3 Notification of collection

If we collect details about you from someone else, we will, whenever reasonably possible, make you aware that we have done this and why, unless special circumstances apply, including as described in Items (a) to (d) below.

Generally speaking, we will not tell you when we collect personal information or personal data about you in the following circumstances:

- (a) where you are listed as an emergency contact for one of our residents;
- (b) where information is collected from any previous landlord or letting agent, or personal referee you have listed on any application form (including any employment application) with UniLodge;
- (c) where information is collected from publicly available sources including but not limited to court judgments, directorship and bankruptcy searches, social media platforms (such as Facebook, Twitter, Google, Instagram etc); or
- (d) as otherwise required or authorised by law.

3.4 Unsolicited personal information or personal data

In the event we collect personal information or personal data from you, or a third party, in circumstances where we have not requested or solicited that information (known as unsolicited

information), and it is determined by UniLodge (in its absolute discretion) that the personal information or personal data is not required, we will destroy the information or ensure that the information is de-identified.

In the event that the unsolicited personal information or personal data collected is in relation to potential future employment with UniLodge, such as your CV, resume or candidacy related information, and it is determined by UniLodge (in its absolute discretion) that it may consider you for potential future employment, UniLodge may keep the personal information or personal data on its human resource records.

3.5 **How we hold your personal information or personal data**

Once we collect your personal information or personal data, we will either hold it securely and store it on infrastructure owned or controlled by us, or (as permitted under Australian law) with a third party service provider who has taken reasonable steps to ensure it complies with the *Privacy Act 1988* (Cth).

We provide more general information on our security measures in **Section 10 (Data security and quality)**.

3.6 **Cookies and IP addresses**

If you use our website, we may utilise "cookies" (including through Google Analytics) which enable us to monitor traffic patterns, trends and to serve you more efficiently if you revisit our website. In most cases, a cookie does not identify you personally but may identify your internet service provider or computer.

We may gather your IP address as part of our business activities and to assist with any operational difficulties or support issues with our services. This information does not identify you personally.

However, in some cases, cookies may enable us to aggregate certain information with other personal information or personal data we collect and hold about you. UniLodge extends the same privacy protection to your personal information or personal data, whether gathered via cookies or from other sources, as detailed in this Privacy Policy.

You can set your browser to notify you when you receive a cookie and this will provide you with an opportunity to either accept or reject it in each instance. However, if you disable cookies, you may not be able to access certain areas of our websites or take advantage of the improved web site experience that cookies offer.

4. **Uses and disclosures of personal information or personal data**

4.1 **Use and disclosure details**

We provide a detailed list at **Section 2** of some common uses and disclosures we make regarding the personal information or personal data we collect.

4.2 **Other uses and disclosures**

We may also use or disclose your personal information or personal data and in doing so we are not required to seek your additional consent:

- (a) when it is disclosed or used for a purpose related to the primary purposes of collection detailed above and you would reasonably expect your personal information or personal data to be used or disclosed for such a purpose;
- (b) if we reasonably believe that the use or disclosure is necessary to lessen or prevent a serious or imminent threat to an individual's life, health or safety or to lessen or prevent a threat to public health or safety;
- (c) if we have reason to suspect that unlawful activity has been, or is being, engaged in; or

(d) if it is required or authorised by law.

4.3 Use and disclosure procedures

In the event we propose to use or disclose such personal information or personal data other than for reasons set out in the above table at **Section 2** or as otherwise outlined in this Privacy Policy, we will first notify you or seek your consent prior to such disclosure or use.

Your personal information or personal data is disclosed to these organisations or parties only in relation to the products or services we provide to you or for a purpose permitted by this Privacy Policy.

We take such steps as are reasonable to ensure that these organisations or parties are aware of the provisions of this Privacy Policy in relation to your personal information or personal data.

4.4 Communications opt-out

If you have received communications from us and you no longer wish to receive those sorts of communications, you should contact us via the details set out at the top of this document and we will ensure the relevant communication ceases. Any other use or disclosure we make of your personal information or personal data will only be as required or authorised by law or as permitted by this Privacy Policy or otherwise with your consent.

5. Sensitive information

5.1 Sensitive information generally

Sensitive information is a subset of personal information or personal data. It means information or opinion about an individual's racial or ethnic origin, political opinions, membership of a political organisation, 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 information about an individual, genetic information, biometric information that is to be used for the purpose of automated biometric verification or biometric identification or biometric templates.

5.2 Collection and use of sensitive information

Given the nature of our business, we do require the collection of some sensitive information if you wish to utilise our services or apply for employment with us. However, we attempt to limit the collection of sensitive information we may collect from you, and we do not collect sensitive information from you without your consent.

The type of sensitive information we may collect about you is dependent on the services provided to you by UniLodge and will be limited to the purpose(s) for which it is collected. We set out some types of sensitive information we may collect about you in the "*Human resources*" and "*Residents*" sections of the table at **Section 2** above.

We do not use sensitive information to send you Direct Marketing Communications (as set out in **Section 6** below) without your express consent.

5.3 Consent

We may collect other types of sensitive information where you have consented and agree to the collection of such information. Generally speaking, we will obtain this type of consent from you at (or around) the point in time in which we collect the information.

6. Direct Marketing

6.1 Express informed consent

You give your express and informed consent to us using your personal information or personal data set out in:

- (a) the “*Enquiries about investment and sales*” section; and
- (b) the “*Marketing, testimonials, surveys and competitions*” section,

of the table at **Section 2** of this document above to provide you with information and to tell you about our products, services or events or any other direct marketing activity (including third party products, services, and events) which we consider may be of interest to you, whether by post, email, SMS or the UniLodge mobile app (**Direct Marketing Communications**).

6.2 **Inferred consent and reasonable expectations of direct marketing**

Without limitation to **paragraph 6.1**, if you have provided inferred or implied consent (e.g. not opting out where an opt-out opportunity has been provided to you) or if it is within your reasonable expectation that we send you Direct Marketing Communications given the transaction or communication you have had with us, then we may also use your personal information or personal data for the purpose of sending you Direct Marketing Communications which we consider may be of interest to you.

6.3 **Opt-out**

If at any time you do not wish to receive any further Direct Marketing Communications from us or others under this **Section 6**, you may ask us not to send you any further information about products and services and not to disclose your information to other organisations for that purpose. You may do this at any time by using the “unsubscribe” facility included in the Direct Marketing Communication or by contacting us via the details set out at the top of this document.

7. **Credit Information and our Credit Reporting Policy**

7.1 **Credit information generally**

Privacy Law regulates the use and disclosure of credit information, which applies in relation to the provision of both consumer credit and commercial credit.

7.2 **Credit information and UniLodge**

We are considered a credit provider under Privacy Law in relation to any credit we may provide you (in relation to the payment of your account with us).

We use credit related information for the purposes set out in the “*Enquiries about investment and sales*” and “*Residents*” sections of the table at **Section 2** above, which includes but is not limited to using the information for our own internal assessment of your credit worthiness.

7.3 **Storage and access**

We will store any credit information you provide us, or which we obtain about you, with any other personal information or personal data we may hold about you.

You may request to access or correct your credit information in accordance with the provisions of **Section 11**.

7.4 **Complaints**

Please see **Section 12** if you wish to make a complaint in relation to our handling of your credit information.

7.5 **Our Credit Reporting Policy**

Please see our **Credit Reporting Policy** for further information as to the manner in which we collect, use, store and disclosure credit information.

8. Anonymity and pseudo-anonymity

Our general practice is not to permit individuals to deal with us on an anonymous basis or through the use of a pseudonym. Generally, your personal information or personal data is required in order to provide you with our products and services or to resolve any issue you may have.

9. Cross Border Disclosure

9.1 Cross border disclosures

Any personal information or personal data collected and held by UniLodge in Australia or New Zealand may be disclosed or transferred to, and held at, a destination outside Australia or New Zealand (as the case may be), including but not limited to New Zealand or Australia where we also operate, and the United States and the United Kingdom where we utilise third party service providers to assist UniLodge with providing our goods and services to you.

Personal information or personal data may also be processed by staff or by other third parties operating outside Australia or New Zealand who work for us or for one of our suppliers, contractors or agents.

As we use service providers and platforms which can be accessed from various countries via an Internet connection, it is not always practicable to know where your information may be held. If your information is stored in this way, disclosures may occur in countries other than those listed above.

In addition we may in the future utilise overseas IT services (including software, platforms and infrastructure), such as data storage facilities or other IT infrastructure. In such cases, we may own or control such overseas infrastructure or we may have entered into contractual arrangements with third party service providers to assist UniLodge with providing our products and services to you.

9.2 Provision of informed consent

By submitting your personal information or personal data to UniLodge, you expressly agree and consent to the disclosure, transfer, storing or processing of your personal information or personal data outside of Australia or New Zealand. In providing this consent, you understand and acknowledge that countries outside Australia and New Zealand do not always have the same privacy protection obligations as Australia and New Zealand in relation to personal information or personal data. However, we will take steps to ensure that your information is used by third parties securely and in accordance with the terms of this Privacy Policy.

Where the Australian Privacy Law applies, the *Privacy Act 1988* requires us to take such steps as are reasonable in the circumstances to ensure that any recipients of your personal information or personal data outside of Australia do not breach the privacy principles contained within the *Privacy Act 1988*. By providing your consent, under the *Privacy Act 1988*, we are not required to take such steps as may be reasonable in the circumstances. However, despite this, we acknowledge the importance of protecting personal information or personal data and have taken reasonable steps to ensure that your information or data is used by third parties securely and in accordance with the terms of this Privacy Policy.

9.3 If you do not consent

If you do not agree to the disclosure of your personal information or personal data outside Australia or New Zealand by UniLodge, you should (after being informed of the cross border disclosure) tell UniLodge that you do not consent. To do this, either elect not to submit the personal information or personal data to UniLodge after being reasonably informed in a collection notification or please contact us via the details set out at the top of this document.

Where the New Zealand Privacy Law applies, the *Privacy Act 2020* permits UniLodge to disclose personal information outside New Zealand without your consent where UniLodge has another basis (other than express consent) for doing so.

10. Data security and quality

10.1 UniLodge's security generally

We have taken steps to help secure and protect your personal information or personal data from unauthorised access, use, disclosure, alteration, or destruction. You will appreciate, however, that we cannot guarantee the security of all transmissions or personal information or personal data, especially where human error is involved or malicious activity by a third party.

Notwithstanding the above, we will take reasonable steps to:

- (a) make sure that the personal information or personal data we collect, use or disclose is accurate, complete and up to date;
- (b) restrict the number of staff who have access to your personal information or personal data on a "need to know" basis;
- (c) protect your personal information or personal data from misuse, loss, unauthorised access, modification or disclosure both physically and through computer security methods; and
- (d) destroy or permanently de-identify personal information or personal data if it is no longer needed for its purpose of collection.

10.2 Accuracy

The accuracy of personal information or personal data depends largely on the information you provide to us, so we recommend that you:

- (a) let us know if there are any errors in your personal information or personal data; and
- (b) keep us up-to-date with changes to your personal information or personal data (such as your name or address).

We provide information about how you can access and correct your information in **Section 11**.

11. Access to and correction of your personal information or personal data

You are entitled to have access to any personal information or personal data relating to you which we hold, except in some exceptional circumstances provided by law (including under Privacy Law). You are also entitled to edit and correct such information if the information is inaccurate, out of date, incomplete, irrelevant or misleading.

If you would like access to or correct any records of personal information or personal data we have about you, you are able to access and update that information (subject to the above) by contacting us via the details set out at the top of this document.

12. Resolving Privacy Complaints

12.1 Complaints generally

We have put in place an effective mechanism and procedure to resolve privacy complaints. We will ensure that all complaints are dealt with in a reasonably appropriate timeframe so that any decision (if any decision is required to be made) is made expeditiously and in a manner that does not compromise the integrity or quality of any such decision.

12.2 Contacting UniLodge regarding complaints

If you have any concerns or complaints about the manner in which we have collected, used or disclosed and stored your personal information or personal data, please contact us:

Telephone: +61 7 3233 3700

Email: info@UniLodge.com.au

Address: GPO Box 2481, Brisbane, Qld, 4001, Australia

Please mark your correspondence to the attention of the Privacy Officer.

12.3 Steps we take to resolve a complaint

In order to resolve a complaint, we:

- (a) will liaise with you to identify and define the nature and cause of the complaint;
- (b) may request that you provide the details of the complaint in writing;
- (c) will keep you informed of the likely time within which we will respond to your complaint; and
- (d) will inform you of the legislative basis (if any) of our decision in resolving such complaint.

12.4 Register of complaints

We will keep a record of the complaint and any action taken in a Register of Complaints.

12.5 Unresolved complaints

If you have any concerns about our handling of your personal information or your complaint, you may raise your complaint to:

- (a) for Australian residents—the Office of the Australian Information Commissioner:

Website: oaic.gov.au

Phone: 1300 363 992

Post: GPO Box 5218 Sydney, NSW 2001

- (b) for New Zealand residents—the Office of the Privacy Commissioner:

Website: privacy.org.nz

Phone: 0800 803 909

Post: PO Box 10094, Wellington 6143

13. GDPR

13.1 Application

If you are a resident of the European Union for the purposes of the GDPR, then the additional provisions in this section 12.5 also apply to you.

13.2 Definitions

In providing our products and services, or collecting and using your personal data, we are required to comply with the GDPR if you are a European Union resident.

In this Section 12.5, the following defined terms have the associated meanings:

- (a) **data subject** has the meaning given to that term in the GDPR.
- (b) **GDPR** means Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC; and
- (c) **personal data** has the meaning given to that term in the GDPR. More generally (and without limiting the definition in the GDPR), it means any information relating to an identified or identifiable natural person (i.e. by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person).of the data subjects whose data is processed for the purposes of the provision of our student accommodation and support services.

13.3 **GDPR obligations**

Under the GDPR, UniLodge is considered a “data controller” in the provision of its student accommodation services to you, and as such determines the purposes and means for processing of personal data.

In its role as the “data controller”. UniLodge has implemented appropriate technical and organisational measures to ensure and to be able to demonstrate that processing is performed in accordance with the GDPR.

In addition to your rights of access and correction as set out above, as a data subject you may:

- (a) **(access)** request access to your personal data held by UniLodge;
- (b) **(rectification)** request to update or rectify any of the personal data that we hold about you by contacting us at the details specified above and request personal data updates;
- (c) **(erasure)** withdraw your consent to UniLodge’s use of your personal data as described in this policy by deletion or erasure of your personal data that we hold where that data is no longer required for the purpose for which it was collected;
- (d) **(restriction on processing)** obtain from UniLodge a restriction on processing of your personal data where:
 - (1) accuracy of the personal data is contested;
 - (2) the processing by the controller is unlawful (and you oppose erasure but request restriction of use);
 - (3) UniLodge no longer needs your personal data; or
 - (4) you have objected to processing pursuant to your right to object under Article 21(1) of the GDPR;
- (e) **(data portability)** request that UniLodge:
 - (1) provides you with a copy of the personal data that UniLodge holds about you in a portable, machine readable form; or
 - (2) share your personal data with a nominated third party.

13.4 **Exercising your Data Subject rights**

If you wish to exercise any of your data subject rights, please send your request in writing to our Privacy Officer using the contact details in section 12.2.

We will process your request promptly and in any event, usually within one month of receipt of receiving it.

13.5 **Complaints**

If you have any concerns in relation to UniLodge's collection or processing of your personal data, then you also have a right to complain to the relevant supervisory authority (within the meaning of the GDPR), see https://edpb.europa.eu/about-edpb/board/members_en.

14. **Consent, modifications and updates**

14.1 **Interaction of this Policy with contracts**

This Privacy Policy is a compliance document prescribed by law rather than a legal contract between two or more persons. However, certain contracts may incorporate all, or part, of this Privacy Policy into the terms of that contract. In such instances, UniLodge may incorporate the terms of this policy such that:

- (a) certain sections or paragraphs in this policy are incorporated into that contract, but in such a way that they do not give rise to contractual obligations onto UniLodge, but do create contractual obligations on the other party to the contract; and
- (b) the consents provided in this policy become contractual terms provided by the other party to the contract.

14.2 **Acknowledgement**

By using our website, purchasing a product or service from UniLodge, where you have been provided with a copy of our Privacy Policy or had a copy of our Privacy Policy reasonably available to you, you are acknowledging and agreeing:

- (a) to provide the consents given by you in this Privacy Policy; and
- (b) that you have been informed of all of the matters in this Privacy Policy.

14.3 **Modifications and updates**

We reserve the right to modify our Privacy Policy as our business needs require. We will take reasonable steps to notify you of such changes (whether by direct communication or by posting a notice on our website).

If you do not agree to our continued use of your personal information or personal data due to the changes in our Privacy Policy, please stop providing us with your personal information or personal data, and contact us via the details set out at the top of this document.