

APP Privacy Policy

Name of business and shopping centre specific to be entered here

Ekaton Corporation Pty Ltd ACN 064 314 745 trading as Frewville Village Shopping Centre is committed to the protection of personal privacy within the scope of applicable law. This Privacy Policy covers our treatment of personal information that we collect, use and disclose.

We may update this Privacy Policy from time to time. The most current version will be located on our website, and is also available by contacting our Privacy Officer by email or at the address detailed below. By our website, or by providing any personal information to us, you consent to the collection, use and disclosure of your personal information as set out in this Privacy Policy.

Types of personal information collected

The types of personal information that we collect and hold will vary depending on your dealings with us, whether you are an employee, supplier, service contractor, customer, retailer or casual mall retailer. This information may include any or all of the following:

- name, address(es), telephone number(s) and other contact details;
- date of birth and gender
- emergency contacts name and phone numbers (next of kin, family or friend)
- tax file numbers
- personal qualifications
- images via CCTV
- electronic address(es);
- payment information (such as credit card or bank details);
- other personal information required to provide our services;
- transaction details relating to your use of our products, services or benefits and
- Membership benefits.

We will not collect sensitive information from you or any third party.

From time to time, you may provide us, and we may collect from you, personal information of a third party (for example, for delivery purposes). Where you provide the personal information of a third party, it is your responsibility to ensure that those persons are aware of this Privacy Policy, understand it, and agree to accept it.

You do not have to provide us with any personal information, however if you do not do so we may not be able to provide you with the products, services or benefits you have requested.

How we collect personal information

Generally, we collect personal information directly from you, such as:

- when you submit information through our website,
- in person,
- when lodging an application for employment,
- when making an enquiry or lodging a complaint,
- when entering a competition via online or mobile application,
- when purchasing a gift card,
- when logon to WIFI,
- when completing a survey,
- in the course of us providing you with a requested product, service or benefit,
- when hiring of mobility aids,
- when you have other dealings with us,
- when collecting a key or related contract service work,
- we have installed CCTV video and camera surveillance, in stores, common areas and car parks,
- we collect information from potential retailers and guarantors at the time of negotiation of a new or existing lease/licence or casual agreement for a shop, kiosk or casual site.

We collect personal information through:

- our related bodies corporate;
- our business partners; and
- third parties who supply services to us.

Why we collect, use and disclose personal information

We will use the personal information we collect for the purpose disclosed at the time of collection, or otherwise as set out in this Privacy Policy. We will not use your personal information for any other purpose without first seeking your consent, or where authorised or required by law.

We will collect personal information for the following purposes:

- to establish and maintain your relationship with us;
- to provide the products or services you have requested from us; or
- to answer any inquiry you make,
- to be used in connection with management, security, insurance companies and to relevant government departments including Police,
- to assist us to determine the suitability of a retailer to enter into a legal agreement,
- to assist us to monitor the performance of our centres and businesses.

We may also disclose your personal information to third parties who work with us in our business to provide, promote, or improve the products or services you have requested or are interested in, such as:

- manufacturers and suppliers;
- couriers and delivery contractors;
- marketing consultants and promotions companies;
- website hosts; and
- consultants and professional advisers.

Direct marketing

We will also use and disclose your personal information to send direct marketing to you from

- us;
- our related bodies corporate; and
- third parties who provide services to us.

The direct marketing may relate to:

- our products and services;
- the products and services of other parties;
- new developments we believe may be of interest to you.

You may opt-out of receiving this direct marketing through the unsubscribe function that will be made available to you with each direct marketing communication.

How we store and protect personal information

We store personal information in a combination of computer storage facilities, paper-based files and other records. In so doing, we have taken numerous steps to protect your personal information from misuse, interference and loss, and unauthorised access, modification or disclosure.

Additionally, we take reasonable steps to destroy or permanently de-identify personal information when we no longer need it.

The internet is not a secure method of transmitting information. Accordingly, other than where we use secure socket layer technology (SSL) to ensure information is securely transmitted and processed, we cannot and do not accept responsibility for the security of information you send to or receive from us over the internet, or for any unauthorised access or use of that information.

Do we send personal information overseas?

We will not transfer your personal information outside of Australia

How you can access your personal information

We will take reasonable steps to make sure that the personal information we collect use or disclose is accurate, complete, and up to date. If your personal details change, such as your address or phone number, please contact our Privacy Officer by email or at the address detailed below.

At your request, we will provide you with a copy of any personal information which we hold about you, unless an exception under the Privacy Act 1988 applies. We will provide this information free of charge.

We will promptly acknowledge and investigate any complaint about the way we manage personal information.

Cookies

Our website uses cookies to track user traffic patterns and to better serve you when you revisit a website. A cookie is a small data file that a website may write to your hard drive when you visit it. A cookie file can contain information, such as a user ID which the website uses to track the pages you have visited. You can refuse all cookies by turning them off in your browser. However, full functionality for our websites requires the use of cookies.

Information is also generated whenever a page is accessed on our website that records information such as the time, date, and specific page. We collect such information for statistical and maintenance purposes that enables us to continually evaluate our website performance.

How to contact us or make a complaint

If you have any questions about this Privacy Policy, if you wish to update information we hold about you or if you wish to make a complaint about our collection, use, or disclosure of your personal information under this Privacy Policy, please contact:

The Privacy Officer
Physical Address; 600 Main North Road, Smithfield SA 5114
Postal Address; PO Box 95, Smithfield SA 5114

Email: privacyofficer@chapleygroup.com.au

We will take reasonable steps to remedy any issues resulting from our failure to comply with our privacy obligations.

Last updated March 2014