

Privacy Policy

1. General Purpose and Principles

- (a) Perth Markets Group Limited and its related bodies corporate (**PMGL**) values your privacy and is committed to protecting your personal data. The following Privacy Policy sets out how and when PMGL will collect, use, secure and disclose personal information.
- (b) PMGL abides by the *Privacy Act 1988* (Cth), the Australian Privacy Principles, and the *Privacy Amendment (Notifiable Data Breaches) Act 2017* (Cth).
- (c) This Policy and our Privacy Statement applies to PPMGL in relation to personal information and sensitive information collected by PMGL.
- (d) Personal data includes any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).
- (e) PMGL's Privacy Policy is to inform people of:
 - (i) how and when PMGL collects personal information;
 - (ii) how PMGL uses and discloses personal information;
 - (iii) how PMGL keeps personal information secure, accurate and up-to-date;
 - (iv) how an individual can access and correct their personal information;
 - (v) how PMGL will facilitate or resolve a privacy complaint; and
 - (vi) when PMGL may disclose information to overseas recipients, and the location of those overseas recipients.

2. Who PMGL is

- (a) PMGL is a property owner, develop and facilities manager of a 51ha site that supports the fresh food industry. Further details can be found on the website. Our contact details can be found below.

3. Collection

- (a) PMGL may collect personal data from a person in the course of our business, through your use of the PMGL website, when you contact or request information from PMGL, or as a result of your relationship with PMGL. Sometimes, PMGL may request personal information from you which consists of sensitive personal information. The information collected is necessary to facilitate PMGL providing services to you, together with the management of Perth Markets.
- (b) The type of information collected may include but is not limited to:
 - (i) Contact information, such as name, postal address, email address and phone number(s), emergency contact details;
 - (ii) Details relating to employment and employee;
 - (iii) Identification and background information provided by you. This may include full name, photographic identification and gender and licenses (including if applicable high risk licence);

- (iv) If applicable, financial information, such as bank accounts, investments and liabilities, billing information and/or financial details relating to companies you are involved with, properties you may own, lease or sub-lease;
 - (v) If applicable, details of any applicable insurance policies, licenses or registrations what you are required to hold in relation to any tenancy you lease at Perth Markets;
 - (vi) If applicable, details relating to the shareholding and transfer(s) of shareholding that is necessary for the efficient management of PMGL;
 - (vii) If applicable, your opinions, comments collected personally by way of surveys and meetings, including but not limited to your views on PMGL, its products and services;
 - (viii) Technical information, such as information collected from your visits to our website; where PMGL may use "cookies" to enable PMGL to monitor traffic patterns. This does not identify you personally.
- (c) PMGL also operates closed circuit television (CCTV) on the premises of PMGL in order to co-ordinate, manage and maintain good order, safety and security of PMGL and its premises. Upon entry onto PMGL's premises you may be photographed or included in any CCTV footage. You consent to the use of your image by PMGL for advertising and marketing purposes, if required. You also consent to PMGL recording and reviewing any CCTV footage of you in connection to any incident, accident or security requirement.
- (d) PMGL will ensure that all recorded personal information is secure and either de-identified or destroyed when it is no longer relevant.
- (e) PMGL may also provide CCTV footage to:
- (i) any government authority or other agency in the event of any incident, accident or alleged criminal act;
 - (ii) PMGL's insurance providers and claims manager in the event of any incident, accident or claim in respect of the Perth Markets or PMGL;
 - (iii) PMGL's lawyers; and
 - (iv) Tenants where CCTV footage relates to any incident, theft, criminal act or other security requirement directly in connection with the Tenant's business.
- (f) As much as possible or unless otherwise provided under this Privacy Policy, PMGL will collect information directly from you. However, sometimes PMGL may collect personal information from a third party. If PMGL has collected personal information from a third party PMGL will, whenever reasonably possible, make you aware that PMGL has done this and why.
- (g) PMGL may also collect personal information about you from other sources, such as when you engage in certain activities, filling out a survey or sending PMGL feedback, PMGL may ask you to provide certain information or from publicly available sources (such as court judgments, searches and social media). It is completely optional for you to engage in these activities and provide the information.
- (h) Depending upon the reason for requiring the information, some of the information PMGL requests of you may be identified as mandatory or voluntary. If you do not provide the mandatory data or any other information PMGL requires to facilitate its services to you, PMGL may be unable to effectively provide its services to you.
- (i) Where you access and use PMGL's website, PMGL may utilise "cookies" which enables PMGL to monitor traffic patterns and to serve you more efficiently on revisiting PMGL's website. A cookie does not identify you personally but may identify your internet service provider or computer. You may set your browser to notify you when you receive a cookie which will provide you with an opportunity to either accept or reject it in each instance. In some cases, cookies may enable

us to aggregate certain information with other personal information we collect and hold about you.

- (j) PMGL may gather your IP address as part of PMGL's business activities and to assist with any operational difficulties or support issues with PMGL's services. This information does not identify you personally.

4. Use and Disclosure

- (a) PMGL only uses and discloses personal information for the purposes for which it was collected, which are directly related to one of our functions or activities:
 - (i) Provision of PMGL services, which include but are not limited to:
 - A. Administration and management of PMGL's services including charging, billing, checks for financial standing and credit-worthiness;
 - B. Information updates or other content that may be of interest to you including marketing and promotional activities undertaken by PMGL;
 - C. Processing of any application for the leasing, assignment, sub-leasing or renewal of a tenancy agreement or alterations, additions, fit-outs or installations of a tenancy;
 - D. If applicable the processing of applications for access cards, parking and access controls, permit to operate a forklift and associated inductions and refreshers;
 - (ii) the coordination, management and maintenance of safety, traffic management, cleanliness, environmental protection, waste management, pest management and security at PMGL, which shall include but not be limited to protecting the rights and safety of PMGL and other parties at the PMGL through the enforcement of the Perth Markets site rules;
 - (iii) customer service functions, maintenance and development of PMGL services, business systems and infrastructure;
 - (iv) investigating and reporting information to third parties regarding any accidents or incidents that may have occurred at the Perth Markets;
- (b) PMGL only discloses your personal information to those parties external to PMGL where those third parties assist PMGL in carrying out its services, are a related party to PMGL or are for a purpose as listed in this policy. Examples of those organisations include:
 - (i) Related entities and subsidiaries of PMGL
 - (ii) Market West
 - (iii) Third parties, such as individuals or business affiliated with the fruit and vegetable industry, including but not limited to suppliers or buyers of produce;
 - (iv) PMGL's Service Providers (or Service Providers engaged by you) and agents, including but not limited to those providing medical services or dispensing emergency treatment, or other companies who assist us in providing our products and services to you.
- (c) PMGL takes such steps as are reasonable to ensure that these organisations and/or parties are aware of the provisions of this Privacy Policy in relation to your Personal Information.

5. Direct Marketing

- (a) You may unsubscribe from receiving any further communication from PMGL at any time. If you do not wish to receive direct marketing communications from PMGL, please contact PMGL via the details provided below, or follow the unsubscribe links in any email communication you may receive from PMGL.

6. Cross Border Disclosure

- (a) It is possible that some of the information collected by PMGL may be disclosed to PMGL's IT service providers who may utilise data hosting facilities outside of Australia. You consent to your information being disclosed to a destination outside Australia for this purpose, including but not limited to the USA and you understand and acknowledge that Australian Privacy Principle 8.1 will not apply to such disclosures of your personal information.

7. Access to Personal Information

- (a) You are entitled to have access to any Personal Information relating to you which PMGL holds, except in some exceptional circumstances provided by law.
- (b) You are also entitled to edit and correct such information if the information is inaccurate, out of date, incomplete, irrelevant or misleading.
- (c) If you would like to access or correct any records of Personal Information PMGL holds 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 end of this policy.
- (d) PMGL recommends that you let PMGL know of any errors in your personal information and keep us up to date of any changes (eg address, status with employer).

8. Security and Access

- (a) PMGL takes steps to protect the personal information we hold against unauthorised access, loss, use, modification or disclosure. PMGL is committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, PMGL has put in place appropriate technical, physical and managerial procedures to safeguard and protect your personal data. PMGL regularly monitors our system for possible vulnerabilities and attacks.
- (b) Pursuant to the provisions of the *Privacy Amendment (Notifiable Data Breaches) Act 2017* (Cth), PMGL is required to provide the Australian Information Commissioner with a Notifiable Data Breach statement when an eligible data breach occurs.
- (c) An "eligible data breach" occurs where:
 - (i) there is unauthorised access to, disclosure of, or loss of personal information held by an entity;
 - (ii) the unauthorised access, disclosure or loss of the personal information is likely to result in serious harm to one or more people; and
 - (iii) the entity has not been able to reduce the risk of serious harm.
- (d) If an eligible data breach occurs in respect of the Personal Information we hold about you, PMGL will notify you directly of the contents of the relevant Notifiable Data Breach statement or, if this is not practicable, publish a copy of the statement on our website and take reasonable steps to publicise the contents of same. PMGL may also be required to notify the Privacy Commissioner of an eligible data breach where necessary.

9. Consent

- (a) By using the PMGL website or accepting the terms and conditions of PMGL's products or services, you consent to PMGL's collection, use and disclosure of your Personal Information in accordance with the PMGL Privacy Statement and this policy.
- (b) PMGL will modify the Privacy Policy and Statement as the business needs require. PMGL will notify you of such changes (whether by direct communication or by posting a notice on the

website), after which your continued use of PMGL products, services or website, or your continued dealings with PMGL shall be deemed to be your consent to PMGL's collection, use and disclosure of your Personal Information. If you wish to withdraw your consent to PMGL's continued use of your Personal Information, please contact PMGL via the details set out at the end of this document.

10. Complaint

- (a) If you have any concerns or complaints about the manner in which your Personal Information has been collected, used or disclosed by PMGL, there are in place an effective mechanism for you to contact PMGL so that we can attempt to resolve the issue or complaint.
- (b) In order to resolve a complaint, PMGL will:
 - (i) liaise with you to identify and define the nature and cause of the complaint;
 - (ii) may request that you detail the nature of the complaint in writing;
 - (iii) will keep you informed of the likely time within which PMGL will respond to your complaint;
 - (iv) will inform you of the legislative basis (if any) of PMGL's decision in resolving such complaint; and
 - (v) keep a record of the complaint and any action taken in the Privacy Complaints Register.
- (c) You may make a privacy complaint with PMGL through the contact details listed below.
- (d) PMGL's Privacy Officer will then attempt to resolve the issue. Due to the nature of services we provide it is not practical for PMGL to communicate with you on an anonymous basis or using a pseudonym, and PMGL therefore will in most circumstances need to correspond with you on a named basis to offer you PMGL's services or resolve any issue you may have. Under the Privacy Act, information from you is categorised as either Personal Information, or, as a subset of Personal Information, known as Sensitive Information.

11. How to contact PMGL

- (a) PMGL hopes this Privacy Policy has been helpful in setting out the way PMGL handles your personal data and your rights to control it. This Privacy Policy sets out most of your rights under relevant laws, but not necessarily every right you have.
- (b) If you have any concerns, requests related to, among others, the exercise of your rights, complaints or questions that haven't been covered, please contact PMGL's Privacy Officer who will be pleased to help you:
- (c) For further information or to make a complaint, please contact PMGL's Privacy Officer at admin@perthmarket.com.au, (08) 9456 9200 or alternatively you can write to PMGL at:
Mail Point 1
280 Bannister Road
Canning Vale WA 6155