



Privacy Policy

1. General Purpose and Principles

- (a) At Perth Markets Group Limited and its related corporate bodies (PMGL), your privacy is important to us. This Privacy Policy outlines how and when we collect, use, secure, and disclose personal information, demonstrating our commitment to your privacy.
- (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 apply to PMGL regarding personal and sensitive information collected by PMGL.
- (d) Your personal and sensitive information includes information that can identify you. It does not include data from which the identity has been removed (anonymous data).
- (e) PMGL's Privacy Policy is to inform people of the following:
 - (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 is PMGL

- (a) PMGL is the property owner, developer, and facilities manager of a 51-ha site that supports the fresh food industry. The website provides further details. Our contact details are below.

3. Policy scope

- (a) This Privacy Policy applies to all employees, contractors, consultants, tenants, buyers, their employees, and any other individual who interacts with our website or visits a PMGL-controlled site.

4. Collection of Personal Information

- (a) PMGL collects personal data from individuals as part of our standard business practices. This data helps to enhance your experience with the PMGL website, facilitate our services to you, and manage Perth Markets.
- (b) The types of information collected may include:
 - (i) Contact information, such as name, postal address, email address, phone number(s), emergency contact details,
 - (ii) Details relating to employment,
 - (iii) Identification and background information, including full name, photographic identification, gender, and licenses (including a high-risk work licence),
 - (iv) Financial information, such as bank accounts, investments, liabilities, billing information, and/or financial details related to companies you are involved with, properties you own, lease or sub-lease,
 - (v) Details of any applicable insurance policies, licenses, or registrations required for any tenancy at Perth Markets,
 - (vi) Details relating to the shareholding and transfer(s) of shareholding necessary for the efficient management of PMGL,
 - (vii) Your opinions or comments collected via surveys and meetings, including but not limited to your views on PMGL, its products, and services, and
 - (viii) Technical information, such as "cookies" collected from visits to our website.
- (c) PMGL also operates closed-circuit television (CCTV) on the premises. Upon entry onto PMGL's premises, you may be photographed or recorded. By entering, you consent to PMGL using your image for advertising and marketing purposes. PMGL may also use CCTV footage for security requirements, incidents, accidents, or criminal acts. You consent to PMGL recording and reviewing CCTV footage when necessary.
- (d) As much as possible, 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. In that case, PMGL will inform you that PMGL has done this and why.
- (e) PMGL may also collect personal information about you from other sources, such as when you engage in certain activities, fill out a survey, or send 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.
- (f) Where you access and use PMGL's website, PMGL may utilise "cookies", which enable PMGL to monitor website traffic patterns and to serve you more efficiently when 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 allow you to accept or reject it in each instance.
- (g) PMGL may gather your IP address as part of PMGL's business activities and assist with any operational difficulties or support issues with PMGL's services. This information does not identify you personally.
- (h) PMGL is committed to ensuring the security of recorded personal information. We take measures to de-identify or destroy data when it is irrelevant.

5. Sensitive Information

We do not generally collect sensitive information (e.g., health data, racial or ethnic origin, or religious beliefs). We will obtain your consent before collecting such information if we ever do.

6. Third-Party Data Collection

- (a)** PMGL may collect personal information from third parties (e.g., publicly available sources such as court judgments, searches, and social media). If this happens, we will inform you and explain why we have done so.

7. Use and Disclosure

- (a) PMGL only uses and discloses personal information which is related to one of our functions or activities:
 - (i) Administration and management of PMGL's services, including billing, financial checks, and tenancy-related matters.
 - (ii) Information updates or marketing material related to our services.
 - (iii) Processing applications for leasing, assignments, sub-leases, access cards, and permits.
 - (iv) Managing safety, traffic, waste, and security within PMGL's premises.
 - (v) Customer service and maintaining PMGL's services, systems, and infrastructure.
 - (vi) Investigating and reporting incidents or accidents that may have occurred at the Perth Markets.
 - (vii) Managing the site access systems.
- (b) PMGL may provide CCTV footage to:
 - (i) A 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.

8. Third-Party Disclosures

- (a) PMGL may disclose your personal information to:
 - (i) Related entities and subsidiaries of PMGL.
 - (ii) Market West.
 - (iii) Service providers, such as those delivering medical services or emergency treatment.
 - (iv) Government agencies and departments as required by law.
- (b) We ensure that all third parties who receive your personal information comply with the provisions of this Privacy Policy.

9. Direct Marketing

- (a) PMGL may use your personal information by email or mail for marketing purposes, including promotional and informational content. You may unsubscribe from receiving such communications at any time by contacting us or following the unsubscribe links in any email communication.

10. Cross Border Disclosure

- (a) PMGL may disclose your personal information to IT service providers involving data hosting outside Australia. By using our services, you consent to such disclosures, including transfers to destinations such as the USA, and acknowledge that Australian Privacy Principle 8.1 will not apply to such transfers.

11. Access to Personal Information

- (a) You have the right to request access to the personal information PMGL holds about you, except in certain circumstances prescribed by law. You may also request to correct any inaccurate, out-of-date, incomplete, or misleading information.
- (b) To access or correct your information, please use the details below to contact us. We will respond to your request within 10 Business days.

12. Security of Personal Information

- (a) PMGL takes reasonable steps to protect our personal information against unauthorised access, loss, use, modification, or disclosure. We have implemented appropriate physical, technical, and managerial procedures to safeguard your data. PMGL regularly monitors our systems for potential vulnerabilities.
- (b) An “eligible data breach” occurs where:
 - (i) There is unauthorised access to, disclosure of, or loss of personal information held by an entity,
The unauthorised access, disclosure or loss of personal information is likely to result in serious harm to one or more people, and
 - (ii) The entity has not been able to reduce the risk of serious harm.
- (c) If an eligible data breach occurs, PMGL will notify you as soon as practicable, including steps you can take to mitigate any harm. In cases where an eligible data breach is likely to result in serious harm, we will notify the Australian Information Commissioner and affected individuals.

13. Protection Against Doxxing

- (a) PMGL is committed to protecting your personal information from unauthorised access, use, or disclosure, including from being maliciously shared or exposed inappropriately, a practice known as doxxing. We take all reasonable steps to safeguard your data from misuse, including using robust security measures to ensure that any personal information we collect is kept secure.
- (b) We do not engage in, condone, or tolerate the practice of doxxing and will take appropriate action against anyone found to be violating our policies by sharing personal information in a harmful or malicious manner. Should we become aware of any attempt to publicly disclose personal information without consent, we will take immediate steps to investigate the matter and take corrective actions to prevent further harm.
- (c) If you believe your personal information has been disclosed without consent or have concerns about doxxing, please contact the PMGL Privacy Officer immediately.

14. Consent

- (a) By using the PMGL website or accepting the terms and conditions of PMGL's services, you consent to the collection, use, and disclosure of your personal information as outlined in this Privacy Policy.

15. Complaint Process

- (a) Please contact us if you have concerns about how PMGL has handled your personal information. We will attempt to resolve your complaint and inform you of our progress.
- (b) To resolve a complaint, PMGL will:
 - (i) Consult 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 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 complaints, and
 - (v) Keep a record of the complaint and any action taken in the Privacy Complaints Register.

- (c) You may make a privacy complaint to the PMGL's Privacy Officer through the contact details listed below with the following information:
- (i) Identify yourself,
 - (ii) Provide an identification or reference number(s), if relevant,
 - (iii) Give a brief description of the matter and why you think PMGL mishandled your personal information (what happened when it happened, and any consequences), and
 - (iv) Describe how you'd like PMGL to do to resolve the matter.
- (d) PMGL's Privacy Officer will then attempt to resolve the issue and reply to your written enquiry within 30 days of receiving your complaint. Due to the nature of our services, it is not practical for PMGL to communicate with you anonymously or using a pseudonym. Therefore, PMGL 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.
- (e) If dissatisfied with our response, you may lodge a complaint with the Office of the Australian Information Commissioner (OAIC).

16. Policy Changes

- (a) PMGL may update this Privacy Policy as required. We will notify you of any significant changes by posting an update on our website. Continued use of our services will be considered as acceptance of these changes.

17. How to contact PMGL

- (a) If you have any concerns or questions about your privacy rights or our practices, please contact PMGL's Privacy Officer:
- Email: privacy@perthmarket.com.au.
 - Phone: (08) 9456 9200.
 - Mail: Mail Point 1, 280 Bannister Road, Canning Vale, WA 6155.