

Precision Group Privacy Policy Oct 2026

Precision Group of Companies Pty Ltd is a group of Australian private property investment companies and includes the companies listed at <https://www.precision.com.au/precision-group-list-of-companies>; (**Precision Group, we, us, our**).

We own and manage a range of commercial properties and shopping centres in Australia and New Zealand (**Centres**) and are accordingly bound by:

- (a) the Australian Privacy Principles (**APPs**) in the *Privacy Act 1988* (Cth) (**Privacy Act**) in Australia; and
- (b) the Information Privacy Principles (**IPPs**) in the *Privacy Act 2020* and the Biometric Processing Privacy Code 2025 in New Zealand

(collectively, **Privacy Laws**).

We understand the importance of, and are committed to, protecting your personal information.

This Privacy Policy sets out how we collect, use, store and disclose your personal information including our obligations and your rights in respect of our dealings with your personal information.

Please take a moment to read our Privacy Policy as it describes what happens to the personal information we collect when we provide you with our products and services, when you access our websites (in each case, our **Website**), mobile applications and social media accounts, and otherwise when you interact with us. This Privacy Policy may be updated from time to time. We will notify you of updates to our policy by posting the updated version on our Website and, for material updates, displaying a notice on our Website for a period after the update takes effect.

1 What is personal information?

Privacy Laws define personal information as 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.

Personal information includes sensitive information, which is defined under the Privacy Laws as information or an opinion about a person's race, ethnic origin, political opinions, membership of political associations and trade associations, religious or philosophical beliefs, sexual orientation or practices, criminal record, health information (for our New Zealand centres and customers, this includes information relating to a person's death held by the Registrar-General under the *Births, Deaths, Marriages, and Relationships Registration Act 2021* (NZ)), genetic information about an individual that is not otherwise health information, biometric information that is used for the purpose of automated biometric verification or biometric identification and biometric templates.

2 Types of personal information we collect

The types of personal information we may collect and hold about you will depend on the nature of our relationship with you, such as the type of services and products you are looking to access or use, whether you are making a general enquiry, or whether you are applying for a career opportunity with us. For instance, we generally need to collect more personal information about our tenants than about the customers of our Centres.

We collect various types of personal information including (but not limited to):

- (c) name, date of birth, age or age bracket, gender, postcode and other demographic information (such as whether you are an overseas or local visitor, a CBD worker or a student, the school your children attend (where you choose to provide this), and your shopping preferences or interests);
- (d) contact details including email, postal and work addresses and phone numbers;
- (e) identification documents such as driver's licence, passport details or digital identification;
- (f) billing and financial information such as credit card, banking and credit information;
- (g) information about properties you own or have an interest in;
- (h) if applying for career opportunity with us: government identifiers (e.g. tax file number, driver's licence information), education and employment history, and if relevant to the role background check and health information;
- (i) information relating to incidents connected to our business, such as personal injuries, misconduct, breach of conditions or unlawful activity;
- (j) social media account details where you have engaged with us on a social media platform;
- (k) recordings from our Closed-Circuit Television (**CCTV**) system and other security systems such as your image, surveillance footage, licence plate number and vehicle details;
- (l) software and hardware information used to access our services such as device name, MAC address, location and movement data, operating system, browser type, IP address, data usage, connection and disconnection times, periods of inactivity, pages visited, and the date, time and duration of those visits;
- (m) information about your preferences as a shopper at one of our centres, including information you provide in response to survey questions or from our service providers;
- (n) information that is publicly available, including on a third-party social media platforms; and
- (o) any other information you provide us, including preferences or opinions relating to our products, and responses to surveys, enquiries or complaints

3 How we collect your personal information

We will collect and hold your personal information in a fair and lawful manner, and not in an intrusive way. We may collect personal information from:

- (a) you directly, for example when you communicate with us either in writing or electronically, entering promotions, accessing our services through our Website or mobile application, purchase and use a gift card;
- (b) our suppliers, service providers, contractors, related entities, related bodies corporate or associated entities;
- (c) our own records when you access or use one of our centres or car parks or the Wi-Fi service provided in our centres;
- (d) in the course of administering, performing or managing contracts any of our services with our service providers or other third parties;
- (e) the Government, for example the Digital ID application (for the purposes of verifying your identity);

- (f) third parties you authorise to disclose your information to us (including banks and other third party financial services);
- (g) recordings from our CCTV system and other security systems;
- (h) public records or other publicly accessible sources; and
- (i) as otherwise required by law or for the purposes of managing our business.

Precision Group will only collect your personal information from sources other than you if it is unreasonable or impracticable to collect that personal information from you. If we collect personal information from a third party we will, where appropriate, request that the third party inform you that we are holding such information, how we will use and disclose it, and that you may contact us to gain access to, correct and update the information.

In New Zealand, we are not required to provide you with a separate notice where we collect your personal information from a third party and you are already aware of that collection.

4 Anonymity and pseudo-anonymity

You may interact with us using a pseudonym where practicable, and we do not generally verify your name against identity documents. In many circumstances, however, it is not practicable for us to deal with you anonymously, because we require your name and contact details to provide our products and services and to respond properly to your questions, concerns or enquiries. If you wish to deal with us anonymously or by pseudonym, you can contact our Privacy Officer and we will endeavor to accommodate your request where it is lawful and practicable to do so..

5 Our purposes for handling your personal information

We only process personal information for purposes that are relevant and reasonable in the circumstances. For example, if personal information is obtained in connection with a tenancy application, we would generally use that personal information to assess your suitability as a tenant, and your ability to meet your obligations. We do not sell, rent or lease your personal information to third parties. However, we may disclose personal information to third parties for purposes described in this section.

Where permitted by the Privacy Laws, we may disclose personal information to our related bodies corporate, agents, affiliated organisations, third parties such as contractors, suppliers, partners, retailers, insurers, service providers (including technical and support services providers), and our professional advisors or consultants. We may disclose personal information to entities seeking to acquire all or part of our business, or other entities with your consent. If we disclose information to a third party, we generally require that the third party protect that information to the same extent that we do.

We collect, hold, use and disclose personal information for the following purposes:

5.1 General

- (a) for marketing (including direct marketing) and business development activities;
- (b) to undertake competitions, promotions and events;
- (c) to offer and provide you with our products and services, or request feedback about products and services you have received;
- (d) to manage and administer those products and services;
- (e) if you have applied for employment, we may use your personal information to consider your suitability for alternative roles;
- (f) to comply with a law, regulation, court order or other legal process;

- (g) to investigate or report suspected unlawful activity;
- (h) to protect, enforce or defend our rights;
- (i) for any purpose disclosed to you and to which you have consented;
- (j) for any purpose that you would otherwise reasonably expect; and
- (k) otherwise to appropriately manage and conduct our business, including performing administrative functions such as billing and accounts and records management.

5.2 Direct marketing

We may use your personal information (never your sensitive information), to provide you information about our products and services either from us, or from third parties we think may be of interest to you, where you have consented or otherwise where it is within your reasonable expectation that we send you direct marketing communications in light of your interactions with us. Communications may be sent by email, SMS, messaging applications, or social media where you interact with us.

If you no longer wish to receive any marketing communications or material from us, or do not want your information used or disclosed for direct marketing purposes, you may opt out by clicking the Unsubscribe link in electronic messages or by contacting our Privacy Officer using the details in section 13.

5.3 Wi-Fi - Service

If you accessed or used the Wi-Fi Service, and consented to us and our Wi-Fi service provider, Beonic Group Pty Ltd ACN 165 152 241 (**Beonic**), collecting and handling of your personal information, we may collect, hold, use and disclose that personal information:

- (a) for direct marketing purposes;
- (b) for research and marketing purposes;
- (c) to provide, maintain and improve the Wi-Fi Service our Website;
- (d) to monitor and log data transmitted using the Wi-Fi Service for security, performance and other compliance purposes;
- (e) to initiate, or assist with, an investigation into any use of the Wi-Fi Service in connection with any unlawful act or purpose; and
- (f) for any other purpose which you either expressly or impliedly consent to by agreeing to the Wi-Fi Terms of Use and accessing and using the Wi-Fi Service.

In addition to this Privacy Policy and our Wi-Fi Terms of Use (available at <https://www.precision.com.au/wifi-terms-of-use>) Beonic's Privacy Policy and Terms & Conditions apply to your use of the Wi-Fi Service and are available at <https://www.beonic.com/privacy-policy> and <https://www.beonic.com/terms-and-conditions>. Please read each of these documents carefully as they describe what happens to personal information collected by us and Beonic in connection with the Wi-Fi Service.

5.4 Video Surveillance

We may collect, hold, use and disclose personal information obtained from video surveillance to run our business and provide our services to you. This includes activities such as:

- (a) for security and safety purposes (including managing incidents and investigations);
- (b) conducting ground transport activities and managing our parking facilities; and
- (c) conducting, monitoring and analysing our businesses and internal operations (including training).

5.5 Application for employment

If you apply for a job with us, we collect and process your personal information to assess your suitability for the role, including verification of your identity, qualifications, certifications, entitlement to work, and to conduct background or criminal history checks. We may also use your personal information during your employment with us. This information may be obtained from you or, in some cases, from third parties such as recruitment agencies. We handle employee information in accordance with the requirements of the *Privacy Act 1988* (Cth) in Australia or the *Privacy Act 2020* (NZ) in New Zealand.

6 Overseas transfers of personal information

We may disclose personal information to our related entities and bodies corporate, associated entities and service providers located outside of Australia and New including the Philippines, the United States of America and countries in Europe. Where we disclose personal information to recipients outside New Zealand, we will do so only where we are satisfied that at least one of the following applies:

- (a) the recipient is subject to the *Privacy Act 2020* (NZ);
- (b) the recipient has agreed to protect the information to a comparable standard; or
- (c) the recipient is subject to Privacy Laws that provide comparable safeguards to the *Privacy Act 2020* (NZ).

If none of these conditions applies, we will only disclose your personal information overseas with your express consent.

By providing your personal information to us, you expressly consent to the disclosure, transfer, storage and/or processing of your personal information to any such overseas recipients for purposes necessary or useful in the course of operating our business. In providing this consent, you understand and acknowledge that:

- (a) APP 8.1 and IPP 12 does not apply to our disclosures of your personal information;
- (b) countries outside of Australia or New Zealand do not always have the same privacy protection obligations as Australia or New Zealand in relation to personal information.

We take reasonable steps to ensure that overseas recipients to whom we disclose your personal information collected in Australia or New Zealand handles, uses and stores your personal information in a secure manner.

If you do not agree to the disclosure of your personal information outside of Australia or New Zealand, do not submit personal information to us.

7 How you can unsubscribe from marketing

You may opt out at any time from receiving marketing communications from us by making a request in writing to our Privacy Officer at PrivacyMatters@precision.com.au if you are in Australia, or info@shore-city.co.nz if you are in New Zealand, or by using the 'unsubscribe' function contained in every electronic direct mail or SMS message you receive from us.

8 Automated decision-making

We do not currently use computer programs or artificial intelligence to make, or do something substantially and directly related to making, decisions that could reasonably be expected to significantly affect your rights or interests. If we introduce automated decision-making of that kind, we will update this Privacy Policy to describe it before it is used.

9 Cookies

When you visit our Websites or other online services, we may use 'Cookies' as part of its interaction with your internet browser. Our Websites or other online services may only function properly if 'Cookies' are enabled. 'Cookies' may be used to personalise or improve your user experience, including:

- (a) **Functionality.** These cookies allow us to recognise you and authenticate you when you access our website or services, and display content that is relevant and specific to you.
- (b) **Analytics and customisation.** These cookies help us understand how you use our website or Software, how effective our marketing campaigns are, or to help us customise our website or services for you.
- (c) **Advertising.** These cookies allow us to collect information about your activities on our website or services (including the content you viewed and links you clicked), so we can present advertisements based on your activities.

A 'Cookie' is a small text file placed on your internet browser for a pre-defined period of time by our Website server for later retrieval. 'Cookies' are frequently used on websites and you can choose if and how 'Cookies' will be accepted by configuring your preferences and options in your browser. 'Cookies' do not alter the operation of your computer or mobile device in any way. 'Cookies' allow a computer or mobile device to be identified, they do not permit reference to a specific individual, unless you have previously subscribed to our Websites or submitted a form via our Websites.

We hope you will want the better service that 'Cookies' allow, but if you prefer, you can update your browser settings to disable 'Cookies'. However, by doing that, your access to our Website and other online services may be compromised or limited. This may also affect the provision of certain services through our Website or other online services.

10 Data Retention

We will store your personal information for so long as is required to provide you with our products and services or some other purpose for which your information was collected, as set out in this privacy policy.

When we no longer require your personal information to carry out any such purpose or if required by law, we will remove or de-identify your personal information as soon as reasonably possible. We take reasonable steps to implement and maintain technical and organisational measures to protect your personal information (such as, data encryption) in our custody or control.

However, we may retain your personal information for another period to comply with any applicable law, for the prevention of fraud, to resolve disputes or for other legitimate purposes.

11 Protection of personal information

We may hold personal information as either secure physical records electronically on our intranet system, in cloud storage or on third party servers.

We take reasonable steps to implement and maintain technical and organisational measures to prevent any loss, misuse, interference, unauthorised access, disclosure, or modification of personal information, including when we dispose of personal information.

We further protect personal information by restricting access to personal information to only those who need access to the personal information to do their job. Physical, electronic and managerial procedures have been employed to safeguard the security and integrity of your personal information.

Data transfers made over the Internet are never 100% secure and if you send us any information, you acknowledge this is done at your own risk.

12 Accessing and correction of your personal information

Under the relevant Privacy Laws, you have a right to seek access to and correction of your personal information that is collected and held by us.

If at any time you would like to seek access to or request correction of the personal information that Precision Group holds about you (including credit information) please contact us in writing addressed to our Privacy Officer at PrivacyMatters@precision.com.au. We will respond to all requests to access or correct personal information within a reasonable time.

Precision Group will grant access to the extent required or authorised by the Privacy Laws or other law and take steps reasonable in the circumstances to correct personal information where necessary and appropriate. On the rare occasions when we refuse access, we will provide you with a written notice stating our reasons for refusing access. We may seek to recover reasonable costs incurred for providing you with access to any of the personal information about you held by us.

We are not obliged to correct any of your personal information if we do not agree that it requires correction and we may refuse to do so. If we refuse a correction request, we will provide you with a written notice stating our reasons for refusing.

If you are dissatisfied with our refusal to grant access to, or correct, your personal information, you may make a complaint to the Office of the Australian Information Commissioner or the Privacy Commissioner for individuals in New Zealand.

13 Resolving personal information concerns

If you have any questions, concerns or complaints about this Privacy Policy, or how we handle your personal information and credit information (including under the APPs or other binding codes), please contact our Privacy Officer at:

Address: Precision Group, Level 25, 9 Castlereagh Street, Sydney NSW 2000;or

email: PrivacyMatters@precision.com.au.

We take all complaints seriously and will respond to your complaint within a reasonable period.

If you are dissatisfied with the handling of your complaint, you may contact:

Australia: Office of the Australian Information Commissioner
GPO Box 5218, Sydney NSW 2001
1300 363 992 or via email at enquiries@oaic.gov.au.

New Zealand: Office of the Privacy Commissioner
PO Box 10094, Wellington 6143
0800 803 909 or via email at enquiries@privacy.org.nz.

14 Further information regarding the Privacy Laws

If you would like further information relating to the application of the APPs and the *Privacy Act 1988* (Cth) in Australia, please visit <https://www.oaic.gov.au/>.

If you would like further information relating to the application of the IPPs and the *Privacy Act 2020* (NZ) in New Zealand, please visit <https://www.privacy.org.nz/>.

15 Changes

We reserve the right to change the terms of this Privacy Policy from time to time without notice to you. An up-to-date copy of our Privacy Policy is available on our Website or on request. This document was last updated on **1 October 2026**.