



## Privacy Policy

1. Southern Sustainable Developments Pty Ltd (ACN 103 009 678) (**We, us**) respects your privacy and is committed to protecting your personal information.
2. Our privacy policy outlines our approach to privacy and how we collect, use and protect your personal information and sets out your rights in relation to accessing the personal information we hold about you.
3. Personal information is defined in the *Privacy Act 1988 (Cth)* and means information or an opinion about an identified individual, or an individual who is reasonably identifiable.
4. We are bound by the Australian Privacy Principles contained in the Privacy Act.

### What personal information we collect

5. We only collect personal information you give us directly, or which is collected automatically as part of your activities with us (including usage data or cookies on our websites).
6. When we collect information, we will ensure you have given verifiable consent or there is some other lawful basis for collection and processing. We will explain to you why we are collecting it, who we give it to and how we will use or disclose it, including by having this policy.
7. The personal information that we collect includes:
  - a. Identifying information, including your name, contact details, phone number, email and home address;
  - b. Transactional information, including information you provide as part of a transaction with us or that is generated as a result of that transaction
  - c. Financial information, including payment details, credit card numbers or bank details;
  - d. Information we are required or authorised to collect and process under law to identify you or verify information you have provided;
  - e. Usage information, including data about your interaction with our website through devices you use;
  - f. Computer and connection information such as page views, traffic, URLs, IP address and web log information.

### Our websites

8. We operate the websites: [ssd.au](http://ssd.au); [ssd.net.au](http://ssd.net.au); [ssdgroup.com.au](http://ssdgroup.com.au); [southernsustainable.com.au](http://southernsustainable.com.au); [seagrove.com.au](http://seagrove.com.au); [theriselyndhurst.com](http://theriselyndhurst.com); [theriselyndhurst.com.au](http://theriselyndhurst.com.au); and [wateredge.com.au](http://wateredge.com.au) (Sites).

9. When you visit our Sites, we may place cookies on your browser to enhance and manage the Sites and improve our business and the services we provide to you. We and/or Google may use this information to optimise and place advertisements, including advertisements of third-party vendors, on our own and third party websites. Google's ability to use and share information collected by Google Analytics is restricted by the Google Analytics Terms of Use and Privacy Policy. Cookies can be managed by accessing the individual settings in your browser.
10. Our Sites do not support "Do Not Track" requests.
11. We may collect personal information from people who are not customers or suppliers of our business but whose personal information is given to us by those individuals via our Sites or in the course of a transaction. If you give us information you must only do so with that individual's authorisation and you should inform them of this privacy policy.
12. Our services are not intended for children and we do not knowingly collect personal information from individuals who are children.
13. Our Sites contains links to, or embeds collection portals, for third party websites. We are not responsible for the privacy policies of any third-party websites. We recommend that you review the privacy policy of each website you visit.

### Why we collect personal information

14. The purpose for which we collect personal information is to enable the effective provision of our services to you and our other customers, including:
  - a. to respond to your enquiries
  - b. to fulfil and complete your requests for services, including the sale, contracting and settlement of a land purchase;
  - c. improve and optimise our services, business and our users' experience
  - d. to send you service messages, reminders and other information requested by you;
  - e. to send you marketing and promotional messages and other information that may be of interest to you, including information sent by, or on behalf of, our business partners that we think you may find interesting. You may opt out of receiving these direct marketing communications at any time. Our electronic marketing activities will comply with the requirements of the Spam Act 2003 (Cth); and
  - f. to comply with our legal obligations, resolve any disputes that we may have with any of our users, and enforce our agreements with third parties.

### When we will use, process or disclose personal Information

15. We will only use, process or disclose your personal information for the primary purpose for which it was collected or otherwise as relevant national laws allow. We may otherwise use and disclose your personal information to detect, prevent and investigate fraudulent behaviour and also where you have given us consent for the use or disclosure or it is required or authorised by law.

16. If those purposes for which we have collected the information involve providing personal information about an individual to any third party, we will take appropriate and reasonable steps to ensure any personal information is protected.
17. We may disclose personal information for the purposes described above to:
  - a. our employees, directors and related bodies corporate;
  - b. data processors, including third party suppliers and service providers (including providers for the operation of our websites and/or our business or in connection with providing our products and services to you);
  - c. professional advisers, dealers and agents;
  - d. payment systems operators (eg merchants receiving card payments);
  - e. our existing or potential agents, business partners or partners who assist in the delivery of our goods and services;
  - f. anyone to whom our assets or businesses (or any part of them) are transferred;
  - g. specific third parties authorised by you to receive information held by us; and/or
  - h. other persons, including government agencies, regulatory bodies and law enforcement agencies, or as required, authorised or permitted by law.

#### **Where your personal information be held and processed**

18. We will process your personal information in Australia.
19. We will provide your information to third parties that provide services to us solely for the purpose of providing those services, including third parties that provide our sales agency, conveyancing, marketing and technology support services. In some unlikely circumstances, this may include providing your information to third parties that are located, or who process information, outside of Australia.
20. Where your personal information is transferred outside Australia we will take steps to ensure that overseas recipients will deal with that information in a way that is consistent with Australian Privacy Law.

#### **Security and retention of personal information**

21. We take reasonable steps to protect the personal information we hold against loss, unauthorised access, use, modification or disclosure and against other misuse. However, we cannot guarantee the security of your personal information.
22. We will only use, process or store personal information for as long as required by the purpose it has been collected, including where such purpose relates to our legitimate interest, and for a longer period where you have given consent to such processing, as long as such consent is not withdrawn. We may be obliged to retain personal information for a longer period whenever required to do so for the performance of a legal obligation or upon order of an authority.

#### **Information you receive through us**

23. Where you transact with another person or entity through us, we may enable you to obtain the personal information of that person or entity. You acknowledge that in these circumstance you are the controller of that data and you should, where required, inform that other person about your privacy practices.
24. Using the personal information of any person you receive through us for any other purpose other than to perform the transaction we enable is prohibited by this policy.

#### **Your rights and our complaints procedure**

25. We have appointed a privacy officer who can be contacted on the details below
26. You have certain rights in relation to the personal information we collect and hold about you. We will allow you to:
  - a. Know what personal information we maintain about you and request a copy of your personal information which we will provide;
  - b. Request us to correct information we hold about you, which we will do promptly.
27. In addition to the information contained in this privacy policy, we may provide you with additional information concerning particular services or the collection and processing of personal information upon request.
28. To make a complaint about how we handle your personal information, you may contact us at the details below. We will respond to your complaint within a reasonable time after it is received. If you are not satisfied by our response, you may acquire further information regarding privacy from the Office of the Australian Information Commissioner.
29. We may make changes to this privacy policy at any time by giving notice on this page and - as far as technically and legally feasible - sending a notice to. We recommend you check this page often, referring to the effective date of the last modification listed at the bottom.

**Privacy Contact:** [privacy@ssd.au](mailto:privacy@ssd.au)

**Effective:** November 2024