

POLICY STATEMENT

Ethos Urban Pty Ltd (ACN 615 087 931) (“**We**”, “**Us**” and “**Our**”) is an Australian based urban development firm. We strive to protect the Personal Information of our stakeholders including but not limited to our clients, potential clients, applicants for employment, contractors, prospective contractors and suppliers, prospective suppliers and visitors to our office premises (“**You**”). The *Privacy Act 1988* (Cth) (“**Act**”) and the Australian Privacy Principles (“**APPs**”) govern the way we collect, use, store and disclose your Personal Information. You consent to us collecting, using, storing and disclosing your Personal Information in accordance with this policy.

We collect, use and store Personal Information in order to:

- provide you with products and services, and manage our relationship with you;
- contact you, for example, to respond to your queries or complaints, or if we need to tell you something important;
- comply with our legal obligations and assist government and law enforcement agencies or regulators;
- facilitate and/or determine applications for employment;
- facilitate your subscription to our newsletters;
- identify and tell you about other products or services that we think may be of interest to you, collectively, the “**Purposes**”.

If you do not provide us with your Personal Information we may not be able to provide you with our services, communicate with you or respond to your enquiries.

Application

Personal information is any information or an opinion (regardless of whether the information or opinion is true) about an identified individual or an individual who can be reasonably identified from the information or opinion (“**Personal Information**”). Personal Information may include “sensitive information” including information about an individual’s political opinions, racial or ethnic origin, religious beliefs or affiliations, membership of political organisations, philosophical beliefs, membership of a profession, trade or trade union, sexual preferences or practices, criminal record and health information.

We collect information about you and your interactions with us, for example, when you purchase or use any of our products or services, call us, attend any of our offices, or otherwise visit our Website. The information we collect from you may include your identity, contact details, health information (for example, during the COVID-19 pandemic), your history of use of our products and services and/or your dealings with us, bank account information and details of enquiries or complaints you make. We will also collect information regarding an applicant for employment’s employment history, qualifications, and education.

We may collect information about how you access, use and interact with our website (“**Website**”). We do this by using a range of tools such as Google. This information may include:

- the location from which you have come to the site and the pages you have visited; and
- technical data, which may include IP address, the types of devices you are using to access the website, device attributes, browser type, language and operating system; and
- [Insert any other information obtained.

Collection of Personal Information

We will collect your Personal Information directly from you whenever you interact with us including in person, over the telephone, by email or through our Website or other information technology systems or applications, including but not limited to, the “Insite” system.

Sometimes we may collect Personal Information from a third party (but only if you have consented to such collection) or from a publicly available source.

Use of Personal Information

We collect Personal Information for the efficient fulfilment of the Purposes. Our employees, contractors, agents and officers and other third parties we may engage to assist with the operation of our business (please refer to “Disclosure of Personal Information” section below), will have access to such Personal Information required by them to perform their functions and may not use such Personal Information for any other purpose.

Storage of Personal Information

We store most Personal Information in computer systems and databases operated by either us or our external service providers. Some Personal Information about you is recorded in paper files that we store securely.

We implement and maintain processes and security measures to protect Personal Information which we hold from misuse, interference or loss, and from unauthorised access, modification or disclosure.

These processes and systems include:

- the use of identity and access management technologies to control access to systems on which information is processed and stored;
- requiring all employees to comply with internal information security policies and keep information secure;
- requiring all employees to complete training about information security; and
- monitoring and regularly reviewing our practise against our own policies and against industry best practice.

We will also take reasonable steps to destroy or de-identify Personal Information once we no longer require it for the purposes for which it was collected or for any secondary purpose permitted under the APPs.

Disclosure of Personal Information

We may disclose your Personal Information to any of our associated entities (as defined in s50AAA of the Corporations Act 2001 (Cth) ("**Associated Entities**") as we see fit for the purposes of our business and as otherwise provided by law. If we disclose your Personal Information to any of our Associated Entities they may use it for the same Purposes that we may. If the ownership or control of all or part of our business changes, we may transfer your Personal Information to the new owner.

We may also disclose your Personal Information to contracted parties whom we trust to perform services on our behalf (including contractors, IT companies, marketing, social media or PR agencies and other third parties we may engage to assist in the operation of our business). These persons will only have access to such Personal Information required by them to perform their functions and may not use such Personal Information for any other purpose.

Additionally, we may disclose your Personal Information where it is disclosed by us in a manner that does not readily permit your identification.

Other than the circumstances described above, we will not give your Personal Information to a third party unless:

- we are required or authorised by law to do so;
- you may have expressly consented to the disclosure or the consent may be reasonably inferred from the circumstances; or
- we are otherwise permitted to disclose the information under the Privacy Act.

Cookies

We use cookies on the Website. A cookie is a small text file that the Website may place on your device to store information. We may use persistent cookies (which remain on your computer even after you close your browser) to store information that may speed up your use of our Website for any of your future visits to the Website. We may also use session cookies (which no longer remain after you end your browsing session) to help manage the display and presentation of information on the Website. You may refuse to use cookies by selecting the appropriate settings on your browser. However, please note that if you do this, you may not be able to use the full functionality of the Website.

Site and Information Security and Storage

Upon receipt of your Personal Information we take all reasonable steps to protect that information against loss, unauthorised access, use, modification or disclosure. We store your information in a secure environment to include, password protected electronic files, maintaining virus protection software, securing paper files in locked cabinets and ensuring physical access is restricted to authorised personnel.

Although we have implemented substantial security measures in relation to Personal Information, as the Website is linked to the internet (and the internet is inherently insecure) we cannot provide any guarantee regarding security of your Personal Information and other data transmitted to the Website. We will not be liable in any way in relation to any breach of security or unintended loss or disclosure of Personal Information or other data due to the Website being linked to the internet.

Third Party Sites

The Website may contain links to and from the websites of third parties (“**Third Party Sites**”). If you follow a link to any of these Third Party Sites, please note that they have their own privacy policies and that we do not accept any responsibility or liability for the use of any Personal Information or other data by third parties.

Transfers of Personal Information outside Australia

The Personal Information that we collect from you may be transferred to, and stored at, a destination outside Australia, such as cloud service providers located overseas. The Personal Information may also be processed by individuals working outside of Australia who work for any of our Associated Entities or are our agents or contractors. Such processing may, for example, be required in order to provide support services to us. Those recipients are likely to be located in the United Kingdom, European Union, United States of America and/or Asia-Pacific.