



This privacy policy sets out how Stockland Corporation Limited and its related companies and trusts ("**Stockland**", "**we**", "**our**" or "**us**") collects, uses, stores, discloses and manages your personal information and how Stockland complies with the *Privacy Act 1988* (Cth) ("**Privacy Act**").

By providing personal information to us, you consent to our collection, use, storage, disclosure and management of your personal information in accordance with this privacy policy and any other arrangements that apply between us. We may change our privacy policy from time to time by publishing changes to it on our website. We encourage you to check our website periodically to ensure that you are aware of our current privacy policy.

What is personal information?

When used in this privacy policy, the term 'personal information' has the meaning given to it in the Act. In general terms, it is any information that can be used to personally identify you. This may include, but is not limited to, your name, address, telephone number, email address and occupation. If the information Stockland collects personally identifies you, or you are reasonably identifiable from it, the information will be considered to be personal information.

What personal information do we collect?

The information Stockland collects about you depends on the products, services or information that you ask us to provide to you and the dealings that you have with us. We may collect the following types of personal information:

- your name, date of birth, gender and contact details including your physical address, mailing address, email address and telephone number;
- bank account and credit card details;
- information to verify your identity such as your driver licence number;
- information relating to your income and credit-worthiness;
- your employment history, and other information you provide as part of the recruitment process, if you apply for a job with us;
- details of products and services that we have supplied to, or you have enquired about, together with any additional information necessary to deliver those products and services and to respond to your enquiries;
- your preferences for particular products, services, facilities or lifestyle activities when you tell us what they are;
- information about you and your family and any characteristics, preferences or requirements that are relevant to the products and services that we may provide to you;
- information relating to your Stockland account, including your password and username;
- any additional information relating to you that you provide to us directly through our websites or indirectly through use of our websites, Wi-Fi services, online presence or otherwise. That information may include information regarding what web pages you access;
- information you provide to us through our representatives or customer surveys from time to time;
- if you hold Stockland securities (or hold securities in a Stockland managed fund), information relating to you and your securityholding;
- if you are involved in an incident, details about the involvement of you and other people in the incident, witness and incident statements, CCTV footage of the incident, medical information and information from medical consultants and other consultants and third parties;
- information including your image collected via our CCTV systems;
- if you use mobile applications developed by us or log-in to wireless facilities provided in a Stockland managed site, including shopping centres, details relating to your use of the mobile application or wireless facility;
- your device ID, device type, geo-location information, computer and connection information, statistics on page views, traffic to and from the sites, ad data, IP address and standard web log information; or
- any other personal information that may be required in order to facilitate your dealings with us.

The Privacy Act contains restrictions on collecting sensitive personal information such as ethnicity, religious views and personal health information. Stockland generally does not collect sensitive personal information about an individual. In limited circumstances, with the express consent of the individual, Stockland may collect some sensitive personal information if it is reasonably necessary in its dealings with a particular individual.

How is personal information collected?

Stockland collects personal information in a number of ways including but not limited to:

- through your access and use of our websites, Wi-Fi services or mobile applications;
- through your enrolment and participation in surveys, questionnaires, customer loyalty programs, competitions and promotions run by or on behalf of us;
- through your communications with us, including emails, letters, conversations or other correspondence between you and our representatives;
- when you make an enquiry, complete an application or purchase order;

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- through our CCTV systems;
- other interactions with our websites, products, services, content or advertising; and
- in the case of incidents in which you are involved, from you, witnesses, CCTV footage of the incident, medical consultants and other consultants and third parties.

In addition, when you apply for a job or position with us we may collect information from you (including your name, contact details, working history and relevant records checks) from any recruitment consultant, your previous employers and others who may be able to provide information to us to assist in our decision on whether or not to make you an offer of employment or engage you under a contract. This privacy policy does not apply to acts and practices in relation to employee records of our current and former employees, which are exempt from the Privacy Act. For Stockland employees a separate internal policy ("Employee Privacy Policy") applies.

We may also collect personal information from third parties including but not limited to, marketing agencies, data collection agencies, credit reporting agencies, law enforcement agencies and other government entities.

What happens if Stockland cannot collect personal information?

If you decide not to provide Stockland with the personal information described above, some or all of the following may happen:

- we may not be able to provide the requested products or services to you, either to the same standard or at all;
- we may not be able to provide you with information about the products and services that you may want; or
- we may be unable to tailor the content of its websites or mobile applications to your preferences and your experience of the websites or mobile applications may not be as enjoyable or useful.

Why do we collect, store, use and disclose personal information?

Stockland operates a number of businesses that utilises personal information. Stockland's businesses include but are not limited to the following:

- property development;
- investment in and leasing of retail, office, business park and industrial property;
- investment in residential property;
- investment in and leasing of retirement living property;
- real estate agency services;
- insurance services; and
- management of unlisted property funds.

Broadly, Stockland collects, stores, uses and discloses your personal information for the following purposes:

- to provide products and services to you and to send information and communications requested by you;
- to inform you of updates concerning us and our products and services;
- to provide you with access to protected areas of our websites;
- to assess the performance of our website and to improve, optimise and protect its operation;
- to conduct business processing functions including providing personal information to our related bodies corporate, contractors, service providers or other third parties;
- for the administrative, marketing (including direct marketing), planning, product or service development, quality control or research purposes of Stockland and its contractors and service providers;
- to provide your updated personal information to our contractors or service providers in order for us to provide and/or offer our products and services to you;
- to update our records and keep your contact details up to date;
- to process and respond to any enquiry or complaint made by you;
- for security and risk management purposes including incident investigation, loss prevention, claims management and litigation;
- to comply with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or in co-operation with any governmental authority of any country (or political sub-division of a country); and
- to consider your employment application.

Your personal information will not be shared, sold, rented or disclosed other than as described in this privacy policy.

We may, from time to time, process your personal information so as to put it in a form from which your identity is not reasonably ascertainable ("**de-identified information**"). We use such de-identified information for analytic purposes, and may disclose that information to others for our business purposes. De-identified information falls outside of the scope of the Privacy Act.

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CCTV at Stockland sites and shopping centres

Stockland uses CCTV surveillance systems to monitor and record activity at Stockland sites, including our shopping centres, offices, logistic and business parks, residential communities and retirement villages. The main purpose of this is to ensure a safe and secure environment. We will only use CCTV footage to personally identify you for security, risk management, loss prevention and incident investigation purposes as outlined in this privacy policy.

At our shopping centres, we also use our CCTV systems to collect and analyse data about customer behaviour trends, including to monitor patterns of foot traffic, to analyse shopper demographics and browsing habits, to improve shop layouts and displays, and to target our marketing activities. This data is aggregated and anonymous, and will not be used to personally identify you.

Free Wi-Fi service

Stockland offers a free Wi-Fi Service at certain Stockland sites, including our shopping centres. If you are carrying a Wi-Fi enabled device within range of one of our Wi-Fi networks, we will automatically pick up location data transmitted from your device. This enables us to give you access to our network. We collect information about the devices within range of our Wi-Fi network, including, for example, the type of device, its ID number or 'MAC address', and its movement throughout the centre. We will not use information from your device to personally identify you, unless you connect to our free Wi-Fi network.

When you connect to our free Wi-Fi network, we collect additional information from you including your name, email address, the details of the websites or mobile applications you access whilst connected to our network, and any other information which you volunteer to us. If we hold other information which can be associated with you or your device (for example, your device's MAC address), we may link this information to your personal information. We will only use information collected via our free Wi-Fi Service in accordance with, and for the purposes set out in, this privacy policy.

Direct marketing communications

Stockland and/or third party service providers we engage may send you direct marketing communications and information about:

- products, services, discounts, competitions and special promotions that we consider may be of interest to you;
- offers or promotions based on how you use our products and services;
- third party products and services (including offers and discounts we may have negotiated for our customers) we think may interest you, if you've chosen to receive this information. For example, if we are selling residential land, we may promote the services of one or more builders.

These communications may be sent in various forms, including by telephone, post, fax, email, SMS or any other form of electronic communication, in accordance with the Privacy Act and the *Spam Act 2003* (Cth).

Under this policy you consent to Stockland and the third party service providers we engage sending you those direct marketing communications by any of those methods. If you indicate a preference for a method of communication, we will try to use that method whenever practicable to do so.

You may opt-out of receiving marketing communications from Stockland and/or our third party service providers at any time by contacting the sender using the details set out in the communication, or in the case of Stockland, using the details set out below) or by using the opt-out facilities provided in the marketing communication (eg an unsubscribe link). If you opt-out using the opt-out details provided in a marketing communication, we will ensure that you are removed from the distribution list for that particular communication. If you wish to opt-out of other (or all) marketing communications or mailing lists, please see below.

Opting-out of other or all marketing communications

If you no longer wish to receive certain or any direct marketing communications from us, you may opt-out at any time by contacting our Privacy Officer using the contact details below. If we are currently providing, and will continue to provide, you with services or products, we may still be required to make certain communications to you as required by law.

To whom does Stockland disclose personal information?

We may disclose personal information for the purposes described in this privacy policy to:

- affiliate retailers in shopping centres where you are a member of a Stockland club (for the purposes of marketing campaigns);
- consultants, agents or contractors acting on our behalf, including real estate and travel agents, marketing agencies, surveyors, conveyancers, builders and property developers;
- valuers where we are seeking to value a property or lease;
- credit reporting agencies or guarantors;
- regulatory authorities or government agencies or bodies where required by law;

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- related parties, entities and trusts of Stockland; and
- parties to whom Stockland has outsourced various functions, including but not limited to providers of share registry services, catering and restaurant services, contractors or service providers for the purposes of operation of our website or our business, custodians, IT systems administrators, mailing houses, couriers, payment processors, data entry service providers, electronic network administrators, debt collectors, insurers, insurance brokers, real estate agents, marketing agents, travel agents, claims management services, injury management services, property management services and professional advisors such as accountants, lawyers and business advisors.

If any Stockland business, company or trust is sold to a third party, we may transfer any personal information we hold about you to that third party. We may also disclose personal information to prospective purchasers of such a business, company or trust on a confidential basis as part of their due diligence investigation of the business, company or trust.

Where we have disclosed personal information to a third party acting on our behalf, we request that those third parties do not use the personal information for their own purposes and that they comply with this privacy policy.

Do we disclose personal information outside Australia?

We may disclose personal information to persons outside Australia, including but not limited to the following:

- our related bodies corporate, located in the United Kingdom and Singapore; and
- our data hosting and other service providers, located in the United States, Canada, Japan and India.

We will take reasonable steps to ensure that any overseas recipient will deal with such personal information in a manner that is consistent with the Privacy Act and this privacy policy.

Cookies

A cookie is a small text file that a website may write to your hard drive when you visit the website. A cookie file can contain information, such as a userID, that the website uses to track the pages you have visited. The only personal information a cookie can contain is information you personally supply. A cookie cannot read data on your hard disk or read cookie files created by other websites.

Stockland's websites use cookies to track user traffic patterns and to better serve you when you revisit the website. You can set your browser to notify you when you receive a cookie, providing you with the opportunity to either accept or reject it. You can also refuse all cookies by turning them off in your browser. We handle personal information collected by cookies in the same way that we handle all other personal information as described in this privacy policy.

Security of Information

Stockland may hold your personal information in either electronic or hard copy form. We take reasonable steps to protect your personal information from misuse, interference and loss, as well as unauthorised access, modification or disclosure and we use a number of physical, administrative, personnel and technical measures to protect your personal information. For example, no employee should be able to access information that they do not require for their duties. There are passwords and security access IDs in place to restrict access to confidential and personal information to those who need it to perform their duties.

Third party links

Our websites and mobile applications may contain links to websites operated by third parties. Those links are provided for your convenience and may not remain current or be maintained. Unless expressly stated otherwise, we are not responsible for the privacy practices of, or any content on, those linked websites, and have no control over or rights in those linked websites. We note that the privacy policies that apply to those websites may differ from this privacy policy.

Access and correction of personal information

If you wish to seek access to the personal information we may hold about you, please contact our Privacy Officer using the contact details set out below. Where we hold information that you are entitled to access, we will try to provide you with a suitable means of accessing it (for example, by mailing or emailing it to you).

There may be instances where we cannot grant you access to the personal information we hold. For example, we may need to refuse access if granting access would interfere with the privacy of others or it would result in a breach of confidentiality. If that happens we will give you written reasons for the refusal.

If you believe that personal information we hold about you is incorrect, incomplete or inaccurate, then you may request us to amend it. If you wish to update the personal information that Stockland may hold, please complete the [Change Details Request Form](#). In some unusual cases we may not agree that there are grounds for amending your personal information. If that happens, we will add a note to the personal information stating that you disagree with it.

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We will not charge you for simply making the request and will not charge for making any corrections to your personal information. Depending on the nature of the request, we may ask you to provide us further information in order to verify your identity, put your request in writing and to complete an enquiry form, which will be sent to you.

What is the process for complaining about a breach of privacy?

If you think we have breached the Privacy Act, or you wish to make a complaint about the way we have handled your personal information, please contact our Privacy Officer. Please provide your name, email address and/or contact number and details of your complaint. Our Privacy Officer deals with privacy complaints and any complaints should be directed to the Privacy Officer using the contact details set out below. We will attempt to confirm as appropriate and necessary with you your understanding of the conduct relevant to the complaint and what you expect as an outcome.

After Stockland has completed its investigation, we will contact you, usually in writing, to advise the outcome and invite a response to our conclusions about your complaint. If we receive a response from you, we will assess it and advise if Stockland has changed its view. If you are unsatisfied with the outcome, we will provide you with information about the further steps you can take.

Stockland securityholders

Stockland has outsourced its share registry function for listed and unlisted securities to Computershare Investor Services Pty Limited. Computershare has its own privacy policy covering the collection, use, storage, disclosure and management of personal information that Computershare collects on our behalf. You may obtain a copy of Computershare's privacy policy at Computershare's website at www.computershare.com/au or by contacting Computershare by:

- Email: privacy@computershare.com.au; or
- Post: Privacy Officer, Computershare Investor Services Pty Limited, Yarra Falls, 452 Johnston Street, Abbotsford Victoria 3067; or
- Phone: 1800 804 985.

You should contact Computershare's Privacy Officer if you have a complaint about privacy or would like details of your personal information in your capacity as a securityholder and your enquiry or complaints relates to Computershare's collection, use, storage, disclosure or management of your personal information. For your protection, Computershare may only disclose personal information to you if its internal procedures (e.g. verifying your identity) are satisfied. If you are not satisfied by Computershare's response to your privacy concerns you should contact Stockland's Privacy Officer. However if your securityholding is sponsored by a broker, Computershare will not be able to update your personal information. You will need to contact your broker to do this.

Changes to Stockland's privacy policy

Stockland reserves the right to modify or amend this privacy policy at any time and will update the privacy policy on Stockland's website if it has been changed. If you have any further questions about this privacy policy, please contact our Privacy Officer.

Contact us (Privacy Officer)

For further information about our Privacy Policy or practices, or to access or correct your personal information, or make a complaint, please contact our Privacy Officer using the details set out below:

- Email: privacy@stockland.com.au; or
- Post: Privacy Officer, Stockland, Level 25, 133 Castlereagh Street, Sydney NSW 2000.

Effective: 12 October 2016