

# PRIVACY POLICY

## Urban Edge SA Group

Group-wide policy for the collection, use, disclosure, storage and protection of personal information



**Effective 9 September 2026**

Australia — South Australia

### CONFIDENTIALITY / PUBLICATION STATUS

*Approved policy format — complete entity/contact and overseas-provider details before publication.*

## Document Control

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**Publication note.** Before publication, replace any bracketed contact details and confirm the Group entities and likely overseas disclosure locations referred to in the policy.

## 1. Our Commitment to Privacy

We respect the privacy of our clients, customers, employees, prospective employees, tenants, prospective tenants, purchasers, vendors, investors, contractors, suppliers, consultants, website visitors and all other individuals who provide personal information to us.

This Privacy Policy explains how we collect, hold, use, disclose, protect and otherwise manage personal information.

We are committed to handling personal information responsibly and, where applicable, in accordance with the Privacy Act 1988 (Cth), the Australian Privacy Principles (APPs) and other applicable Commonwealth and South Australian laws.

For the purposes of this Privacy Policy, “Group”, “we”, “us” or “our” means Urban Edge SA and its related bodies corporate, associated businesses and entities that adopt this Privacy Policy from time to time.

This Privacy Policy applies across our activities, including building and construction, property development, real estate, property sales, property management, leasing and tenancy, investment-related property services, land development and subdivision, customer service, employment and administration.

## 2. What is Personal Information?

“Personal information” generally means information or an opinion about an identified individual, or an individual who is reasonably identifiable.

Depending upon the nature of our dealings with you, the personal information we collect may include:

- name;
- residential, postal and property addresses;
- telephone and mobile numbers;
- email addresses;
- date of birth;
- occupation and employment details;
- signatures;
- identification documents and identification numbers;
- driver’s licence and passport details;
- photographs and images;
- financial and banking information;
- property ownership information;
- information relating to the purchase, sale, construction, development, leasing or management of property;
- building contracts, plans, specifications and property records;
- tenancy applications and tenancy records;
- rental history and references;
- employment and income information;
- financial capacity or finance-related information;
- information provided by finance brokers, banks or other professional advisers where authorised;
- payment and transaction information;
- communications between you and us, including emails, SMS messages, correspondence and telephone records;
- complaints, enquiries and customer service records;

- information provided through our websites, online forms, social media pages, advertising campaigns or other digital platforms;
- IP addresses, device information, cookies and website usage information;
- CCTV footage or other security information where applicable;
- information concerning contractors, subcontractors, consultants and suppliers;
- emergency contact information;
- information contained in employment applications, resumes, references and employment records; and
- any other information reasonably necessary for us to conduct our business or provide our services.

We will endeavour not to collect personal information that is not reasonably necessary for our functions or activities.

### 3. Sensitive Information

In some circumstances we may collect information classified as “sensitive information” under the Privacy Act.

This may include information concerning health or disability, racial or ethnic origin, professional or trade association membership, criminal history or other sensitive matters.

We will only collect sensitive information where:

- you have consented to its collection and the information is reasonably necessary for one or more of our functions or activities;
- collection is required or authorised by law; or
- another exception permitted by law applies.

For example, health or disability information may be required for workplace safety, employment, accessibility, insurance, specialised accommodation or other legitimate purposes.

### 4. How We Collect Personal Information

Where reasonable and practicable, we collect personal information directly from you.

Information may be collected when you:

- make a sales enquiry;
- make a building or construction enquiry;
- enquire about purchasing a property;
- enquire about selling a property;
- enquire about a development;
- enquire about leasing or renting a property;
- submit a tenancy application;
- request property management services;
- enter into a building, construction, development, sale, agency, management, tenancy or other agreement with us;
- attend one of our offices, display homes, construction sites or properties;
- telephone, email, SMS or otherwise communicate with us;
- complete an online enquiry or contact form;
- interact with our websites, advertisements or social media;
- subscribe to marketing or property information;
- participate in a promotion, survey or event;

- apply for employment or work experience;
- become an employee, contractor, subcontractor, supplier or consultant;
- provide identification or financial information;
- make a payment to us;
- lodge a complaint or request; or
- otherwise deal with any member of the Group.

We may also receive personal information from third parties where permitted by law, including:

- related companies within the Group;
- real estate agents;
- property managers;
- landlords and property owners;
- tenants and prospective tenants;
- finance brokers and financial institutions;
- conveyancers and settlement agents;
- lawyers and accountants;
- valuers;
- insurers;
- building consultants;
- architects and engineers;
- contractors and subcontractors;
- referees;
- employers;
- recruitment agencies;
- government departments and authorities;
- publicly available records;
- marketing and lead-generation platforms;
- online property portals;
- social media platforms; and
- other persons authorised by you.

Where required, we will take reasonable steps to notify you of the circumstances of collection.

## 5. Unsolicited Personal Information

We may occasionally receive personal information that we did not request. Where this occurs, we will determine whether we could lawfully have collected that information. If we could not have collected it and we are not legally required to retain it, we will take reasonable steps to destroy or de-identify the information.

## 6. Why We Collect, Hold and Use Personal Information

We may collect, hold, use and disclose personal information for purposes reasonably connected with our business activities, including:

### Customer and Sales Activities

- responding to enquiries;
- providing information about properties, developments, homes and services;
- preparing quotations, proposals and contracts;
- communicating with prospective and existing clients;

- managing customer relationships;
- arranging appointments and inspections;
- providing customer service; and
- following up enquiries.

### **Building and Construction**

- preparing building quotations and contracts;
- assessing proposed projects;
- preparing plans and specifications;
- obtaining approvals;
- arranging construction;
- administering building contracts;
- engaging consultants, suppliers and subcontractors;
- communicating regarding construction;
- managing defects, warranties and maintenance; and
- complying with regulatory and statutory obligations.

### **Property Development**

- assessing and managing development opportunities;
- property acquisition and disposal;
- subdivision and development;
- project management;
- obtaining planning and building approvals;
- dealing with consultants and government authorities;
- marketing developments; and
- selling completed or proposed properties.

### **Real Estate**

- marketing and selling properties;
- conducting inspections;
- processing enquiries and offers;
- communicating with purchasers and vendors;
- preparing and administering transactions;
- complying with agency and regulatory requirements; and
- arranging settlements and related services.

### **Property Management and Tenancy**

- processing tenancy applications;
- assessing applicants;
- verifying identity, employment, income, references and rental history;
- managing leases and tenancies;
- collecting rent and other payments;
- arranging inspections;
- organising maintenance and repairs;
- communicating with landlords and tenants;
- dealing with tenancy disputes; and
- complying with applicable tenancy and property management laws.

## Employment and Contractors

- recruitment;
- assessing employment applications;
- reference and qualification checking;
- onboarding;
- payroll and superannuation administration;
- workplace health and safety;
- training;
- performance management;
- management of employees, contractors and subcontractors;
- maintaining appropriate workplace records; and
- meeting our legal obligations as an employer or principal contractor.

## General Business Purposes

We may also use personal information for:

- invoicing and payment processing;
- accounting and taxation;
- insurance;
- auditing;
- fraud prevention;
- security;
- risk management;
- debt recovery;
- dispute resolution;
- legal proceedings;
- obtaining professional advice;
- business planning and administration;
- improving our products and services;
- maintaining and improving our systems;
- protecting our legal rights;
- complying with legal and regulatory requirements; and
- any other purpose authorised or required by law.

## 7. If You Do Not Provide Personal Information

You are not necessarily required to provide personal information to us. Where lawful and practicable, you may interact with us anonymously or using a pseudonym.

However, in many circumstances we will need to identify you to provide our services or comply with our legal obligations.

If you do not provide information reasonably required by us, we may be unable to:

- properly respond to your enquiry;
- provide an accurate quotation;
- enter into a contract with you;
- process a property transaction;
- assess a tenancy application;

- provide property management services;
- process an employment application;
- engage you as a contractor;
- process payments; or
- otherwise provide the relevant service.

## 8. Sharing Information Within Our Group

Our businesses operate as a group and may share administrative resources, systems, personnel, management functions, marketing systems and professional services.

Personal information may therefore be disclosed between members of the Group where reasonably necessary for legitimate business purposes and where permitted by law.

For example, a person who initially makes an enquiry with one Group company may, where appropriate, be referred to another Group company that provides the service relevant to that enquiry.

Access to personal information within the Group will be limited to persons who reasonably require access for their role or legitimate business purposes.

## 9. Disclosure to Third Parties

We may disclose personal information to third parties where reasonably necessary for our business activities or where otherwise permitted or required by law. These parties may include:

- builders;
- developers;
- real estate agents;
- property managers;
- landlords and property owners;
- contractors and subcontractors;
- architects;
- engineers;
- surveyors;
- building consultants;
- certifiers;
- conveyancers;
- lawyers;
- accountants;
- insurers and insurance brokers;
- banks and payment providers;
- finance brokers;
- valuers;
- utility providers;
- IT and cybersecurity providers;
- cloud storage providers;
- software and CRM providers;
- telecommunications providers;
- marketing and advertising providers;
- recruitment and human resources providers;

- debt collection agencies;
- government agencies;
- local councils;
- planning and building authorities;
- courts, tribunals and law enforcement agencies; and
- other persons authorised by you or permitted or required by law.

We do not sell personal information to unrelated third parties for their independent marketing purposes.

## 10. Government and Legal Disclosure

We may disclose personal information where disclosure is required or authorised by Australian law, a court or tribunal order, or where otherwise permitted by the Privacy Act. This may include disclosure to government departments, regulatory bodies, law enforcement agencies, courts, tribunals, local councils or other authorities.

We may also disclose information where reasonably necessary to establish, exercise or defend a legal or equitable claim or to obtain confidential legal advice.

## 11. Identification Documents

Certain transactions may require us to obtain identification documents. These may include a driver's licence, passport, Medicare card or other identification information.

We will only collect identification information where reasonably necessary or required or authorised by law.

Copies of identification documents will be protected against unauthorised access and will not be retained longer than reasonably necessary, subject to legal record-keeping obligations.

## 12. Financial Information

Where necessary, we may collect financial information including bank account details, payment information, income information, finance approval information and other financial information.

Financial information will only be accessed by persons who reasonably require access and may be disclosed to financial institutions, payment processors, accountants, auditors, professional advisers or other persons where reasonably necessary or legally required.

## 13. Employees and Employment Applicants

We may collect personal information from prospective, current and former employees.

Information concerning prospective employees may include resumes, employment history, qualifications, licences, references, identification information and other information relevant to assessing suitability for employment.

Private-sector employee records relating directly to a current or former employment relationship may, in certain circumstances, be exempt from the Australian Privacy Principles under the Privacy Act.

Notwithstanding any applicable exemption, the Group seeks to manage employee information responsibly, confidentially and securely and in accordance with applicable employment, workplace, taxation, superannuation, work health and safety and record-keeping requirements.

Information concerning unsuccessful applicants will be handled in accordance with applicable privacy obligations.

## 14. Contractors, Subcontractors and Suppliers

We may collect information about individuals who are contractors, subcontractors, suppliers, consultants or representatives of organisations with which we deal. This may include:

- contact information;
- licences and registrations;
- insurance information;
- qualifications;
- work health and safety information;
- banking details;
- identification information; and
- information concerning work performed for the Group.

We may use this information to administer our commercial relationships, verify compliance requirements, process payments, manage workplace safety and meet legal and contractual obligations.

## 15. Direct Marketing

Where permitted by law, we may use personal information to communicate with you regarding properties, developments, building opportunities, services, promotions or other matters that we reasonably believe may be of interest to you.

Marketing communications may occur by email, SMS, telephone, post, online advertising or other permitted channels.

We will comply with applicable requirements concerning direct marketing, including applicable requirements under the Privacy Act, the Spam Act 2003 (Cth) and the Do Not Call Register Act 2006 (Cth).

You may opt out of receiving direct marketing communications at any time by:

- using an unsubscribe facility provided in an electronic communication;
- replying “STOP” where an SMS facility allows this;
- advising the person contacting you; or
- contacting us using the details contained in this Privacy Policy.

We will take reasonable steps to action opt-out requests promptly. Opting out of marketing does not prevent us from contacting you where reasonably necessary to administer an existing contract, tenancy, transaction or business relationship.

## 16. Websites, Cookies and Digital Information

When you use our websites or digital services, certain information may be collected automatically. This may include:

- IP address;
- browser type;
- device information;
- pages visited;
- referring website;

- dates and times of visits;
- interactions with our website; and
- cookie and analytics information.

We may use cookies, analytics technologies and similar technologies to operate our websites, understand website usage, improve user experience, measure advertising performance and provide relevant advertising.

You may be able to restrict cookies through your browser settings, although doing so may affect website functionality.

Where third-party advertising or analytics platforms are used, those providers may process information in accordance with their own privacy policies.

## 17. Social Media and Third-Party Websites

Our websites and communications may contain links to third-party websites or services. We are not responsible for the privacy practices of unrelated third parties.

If you communicate with us through a social media platform, property portal or other third-party service, information may also be collected and processed by that provider under its own privacy policy.

## 18. Storage and Security of Personal Information

Personal information may be held electronically or in hard-copy form. We take reasonable steps to protect personal information we hold against:

- misuse;
- interference;
- loss;
- unauthorised access;
- unauthorised modification; and
- unauthorised disclosure.

Depending upon the circumstances, our safeguards may include:

- access controls;
- passwords and authentication;
- secure cloud-based systems;
- cybersecurity controls;
- restricted staff permissions;
- secure document storage;
- physical security;
- staff confidentiality requirements;
- employee training;
- secure disposal procedures;
- data backup and recovery procedures; and
- appropriate controls over third-party service providers.

No electronic or physical storage system can be guaranteed to be completely secure. We therefore regularly review our information security practices having regard to the nature of the information we hold and reasonably foreseeable risks.

## 19. Overseas Disclosure and Cloud Services

Some of our technology, software, cloud storage, communications, analytics, marketing or other service providers may store or process information using infrastructure located outside Australia.

Accordingly, personal information may in some circumstances be disclosed to or accessible by overseas recipients.

Where practicable, the Group will identify the countries in which overseas recipients are likely to be located and update this Privacy Policy accordingly.

Where the Australian Privacy Principles apply to an overseas disclosure, we will take reasonable steps required by law in relation to that disclosure.

Before publication, the Group should confirm its principal cloud, CRM, email, marketing, payroll and other technology providers and identify relevant overseas countries where practicable.

## 20. Data Retention and Destruction

We retain personal information only for as long as reasonably necessary for the purposes for which it was collected or as required by law.

Retention periods may vary depending upon the nature of the information and applicable legal, taxation, employment, construction, property, tenancy, insurance and record-keeping requirements.

When personal information is no longer required and we are not legally required to retain it, we will take reasonable steps to securely destroy the information or permanently de-identify it.

## 21. Data Breaches

We maintain processes for responding to actual or suspected data breaches. If we become aware of an actual or suspected data breach, we will take reasonable steps to:

1. contain the incident;
2. investigate what occurred;
3. assess the information affected and potential consequences;
4. take appropriate remedial action; and
5. determine whether notification is required.

Where the Notifiable Data Breaches Scheme under the Privacy Act applies and an eligible data breach occurs, we will notify the Office of the Australian Information Commissioner and affected individuals as required by law.

## 22. Access to Your Personal Information

You may request access to personal information that we hold about you. Requests should be made to our Privacy Officer using the contact details below.

Before providing access, we may require reasonable evidence to verify your identity.

We will respond to requests within a reasonable period and will generally provide access in the manner requested where reasonable and practicable.

There may be circumstances permitted by law in which access can be refused or limited. If this occurs, we will provide the reasons required by law.

We will not charge you for making an access request. Where permitted by law, we may charge reasonable costs associated with providing access and will advise you beforehand where applicable.

## 23. Correction of Personal Information

We take reasonable steps to ensure that personal information we hold is accurate, up-to-date, complete and relevant for the purposes for which it is used.

If you believe information we hold about you is incorrect, incomplete, out-of-date, irrelevant or misleading, please contact our Privacy Officer.

Where appropriate and required by law, we will take reasonable steps to correct the information.

## 24. Privacy Complaints

If you believe we have breached your privacy or failed to comply with applicable privacy requirements, please contact our Privacy Officer. Your complaint should provide sufficient information for us to understand and investigate the issue.

We will:

6. acknowledge the complaint where appropriate;
7. investigate the circumstances;
8. seek further information if required;
9. take appropriate corrective action where necessary; and
10. provide a response within a reasonable period.

We aim to respond to privacy complaints within 30 days, although complex matters may require additional time.

We encourage you to contact us first so that we have an opportunity to resolve the matter.

If you are dissatisfied with our response and the Privacy Act applies, you may be entitled to make a complaint to the Office of the Australian Information Commissioner (OAIC), via [www.oaic.gov.au](http://www.oaic.gov.au) or 1300 363 992.

## 25. Children and Minors

Our services are generally intended for adults.

Where we collect personal information relating to a person under 18 years of age, we will take reasonable steps appropriate to the circumstances, including obtaining information or consent from a parent, guardian or authorised representative where required or appropriate.

## 26. CCTV and Security

Some of our offices, construction sites, display properties, developments or managed properties may use CCTV or other security systems.

Where applicable, CCTV footage may be collected for purposes including:

- security;
- workplace health and safety;
- protection of property;

- investigation of incidents;
- prevention and detection of unlawful activity; and
- management of construction sites and workplaces.

CCTV and similar information will be accessed and disclosed only where reasonably necessary or otherwise permitted or required by law.

## 27. Automated Systems and Artificial Intelligence

The Group may use software, automation and artificial intelligence-assisted tools to improve administrative efficiency, organise information, manage enquiries, assist customer service, analyse business information or support staff in performing their duties.

The Group remains responsible for ensuring that personal information used through these systems is handled consistently with applicable privacy requirements.

Where applicable law requires additional disclosure concerning automated decision-making systems, including requirements commencing under the Privacy Act from 10 December 2026, the Group will update this Privacy Policy and its practices as required before undertaking activities to which those requirements apply.

## 28. Access Within the Group

Personal information is not available to all employees merely because they work within the Group.

Access should be limited to employees, officers, contractors and service providers who reasonably require the information for their duties or authorised business purposes.

Individuals who are given access to personal information are expected to maintain its confidentiality and comply with applicable Group policies, contractual requirements and laws.

Unauthorised access, copying, disclosure, alteration or misuse of personal information may constitute misconduct and may result in disciplinary, contractual or legal action.

## 29. Changes to this Privacy Policy

We may amend this Privacy Policy from time to time to reflect changes to legislation, regulatory guidance, our businesses, technology, the services we provide, or the manner in which we handle personal information.

The current version will be published on our website and will state the date it was last updated. We recommend reviewing this Privacy Policy periodically.

## 30. Privacy Officer and Contact Details

Questions, access requests, correction requests, complaints or other enquiries concerning privacy should be directed to:

**Privacy Officer**  
**Urban Edge SA Group**  
**Adelaide, South Australia, Australia**

Privacy enquiries may be submitted using the Group's published email, telephone or website contact channels. Requests should contain sufficient information for us to identify you and understand the nature of your enquiry.

## **31. Application of this Policy**

This Privacy Policy is intended to apply to each member of the Group that adopts it.

Where a particular Group company is subject to additional legal or regulatory privacy obligations, those requirements will apply in addition to this Privacy Policy.

If there is any inconsistency between this Privacy Policy and a mandatory requirement imposed by applicable law, the applicable law will prevail.

## **32. Governing Framework**

This Privacy Policy has been prepared having regard to the Privacy Act 1988 (Cth) and the Australian Privacy Principles.

As businesses operating in South Australia, Group entities will also comply with other applicable Commonwealth and South Australian laws that affect the collection, use, disclosure, security, retention or management of particular categories of information.

Nothing in this Privacy Policy is intended to exclude, restrict or modify any right or obligation that cannot lawfully be excluded, restricted or modified.

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## Appendix A — Website Privacy Collection Notice

**Purpose.** This notice is designed for general website enquiry forms. It should be displayed at or immediately before submission, with a working link to the Group Privacy Policy. More specific notices may be required for tenancy applications, employment applications, finance/identity collection and other higher-detail collection contexts.

### WEBSITE PRIVACY COLLECTION NOTICE

Urban Edge SA Group collects the personal information you provide through this form to respond to your enquiry, assess and provide relevant building, property development, real estate, property management, tenancy or related services, communicate with you, maintain our business records and, where permitted, provide information about relevant Group services. We may share your information with related Group entities and with contractors, consultants, service providers, professional advisers and other parties where reasonably necessary for these purposes or as required by law. If you do not provide the information requested, we may be unable to respond to your enquiry or provide the relevant service. Some service providers may store or process information overseas. Our Privacy Policy explains how we handle personal information, how you may request access or correction, and how to make a privacy complaint.

**By submitting this form, you acknowledge that you have read and understood our Privacy Policy. [\[View Privacy Policy\]](#)**

**Implementation note:** The “[View Privacy Policy]” text should link directly to the current Privacy Policy. For forms collecting information beyond a general enquiry, tailor the collection notice to the specific information, purpose, usual disclosures, legal authority (if any), consequences of non-provision and overseas disclosure circumstances relevant to that form.