

## Privacy Policy

### 1 Introduction

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This Privacy Policy is Fleetwood Limited's (**Fleetwood**) and its subsidiary companies' official Privacy Policy and it applies to all personal information collected and managed by Fleetwood and/or by its subsidiaries, including by way of or for the purpose of its accommodation management systems. In this policy we explain the personal information we collect and hold, how and why we collect and hold personal information, how we use and disclose it, and what controls you have over our use of it.

Fleetwood is committed to complying with Commonwealth legislation governing privacy of personal information by businesses and to protecting and safeguarding your privacy. Fleetwood is also committed to the careful and efficient management of information and its information systems.

In this Privacy Policy, "**personal information**" has the meaning defined in the *Privacy Act 1988* (Cth). It includes your name and address, and any other information about you.

Your use of our services or facilities as part of which we may collect personal information demonstrates your consent to the terms of this Privacy Policy.

### 2 Information we collect

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Some information provided to us by clients, customers, contractors and other third parties might be considered private or personal. We will only collect such personal information if it is necessary for us to carry out our business with clients, customers, contractors and third parties, which may include providing services to you.

Ordinarily we collect most personal information directly from you. For example, we will collect personal information when you fill in an application form, deal with us over the telephone, send us a letter, visit our websites, or when you visit us in person. Sometimes we will collect personal information about you from your employer, including if we have an arrangement with your employer to provide you with services as part of your work for your employer, such as accommodation services.

Some information is required to create an account with us, such as your name, email address, password, date of birth, gender, and your mobile phone number.

Otherwise the type of personal information we collect may include your name, mailing address, telephone number, email address, date of birth, annual income and other financial details, place of work, credit history and your transaction history. There may be occasions when we need to source personal information about you from a third party other than your employer. For example, we may collect personal information from a credit reporting agency, our business alliance partners, third party brokers and government agencies.

When you are using one of our systems that operates by way of mobile phone application or access card, such a system includes features that use precise location data, and record your movements in, out of, within and around the physical area for which the system is used, and some of your activities. Such systems, when used at accommodation facilities which we own or operate, also may collect data about your use of facilities within and around the physical area for which the system is used, number of times and when you visit, what you do when you visit (such as going to the gym, visiting the kitchen). We collect this type of data as it enables us to deliver to you the intended functionality of the system, and also allows us to continue to improve the systems which we offer to customers and their employees.

When you are using one of our systems that operates by way of a mobile phone application, your mobile device may collect data about you. If this is the case, when your mobile device syncs with our applications or software, data recorded on your mobile device is transferred from your device to our servers.

### 3 Use of Information Collected and Disclosure of Personal Information to Others

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We collect, hold, use and disclose personal information for the provision of our services, including administration of our services, accommodation services, functions associated with accommodation services (including the Glyde® energy management and keyless access entry system), notification to you about changes to our services, record-keeping following termination of our services to you, and technical maintenance. Our activities which are likely to involve the use or disclosure of personal information include the supply of products; customer inquiries; and customer account management.

We also use personal information such as location data and facilities use data to tailor services which we offer to you and make your use of those services more personal to you. We also use personal information collected



to develop, test and improve our services, including by testing and troubleshooting new services and features. We may use personal information to generate aggregated statistics and insights into use of our facilities and services that help us and potentially third parties enhance the use and design of those facilities and services.

We may transfer personal information to our corporate affiliates, service providers, and other partners who process it for us, based on our instructions, and in compliance with this policy and any other appropriate confidentiality and security measures.

Personal information is only disclosed to persons outside our business in the circumstances set out in this policy or as otherwise notified to you.

In addition, we are permitted to use or disclose personal information held about you to third parties:

- Where you have consented to the use or disclosure;
- Where the third party is a related company;
- Where the third party is appointed by Fleetwood or its subsidiaries, including our contractors, website and data hosting providers, technology service providers, advertising and research partners and others persons who perform services to us (in which case we will use reasonable steps to ensure such third parties keep your personal information confidential and do not use or disclose your personal information for any purpose other than the purpose of providing those services to us);
- Where such use or disclosure is required to lessen or prevent a serious threat to the life, health or safety of any individual, or to public health or safety;
- Where such use or disclosure is required to take appropriate action in relation to suspected unlawful activity or serious misconduct;
- Where such use or disclosure is required in locating a person reported as missing;
- Where such use or disclosure is required to assert a legal or equitable claim;
- Where such use or disclosure is required to conduct an alternative dispute resolution process; and
- Where such use or disclosure is required under or authorised by law, e.g. to comply with a subpoena, a warrant, or other order of a court or legal process.

#### **4 Use for marketing**

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If you have consented to receiving marketing materials, we may also use and disclose your personal information for the following purposes:

- to allow you to participate in promotions and research conducted by Fleetwood, its subsidiaries and its related companies;
- to allow Fleetwood and its subsidiaries to send you information about offers, promotions, research surveys, products and services from Fleetwood, its subsidiaries and related companies and carefully selected third parties; and
- to allow our carefully selected third party partners to send you research surveys, and or marketing information about their offers, promotions, products and services.

*You may unsubscribe from receiving marketing materials at any time by choosing to “opt-out” of such communications when you receive them from us or otherwise by contacting us.*

#### **5 Links**

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Our website may contain links to other websites and those third party websites may collect personal information about you. We are not responsible for the privacy policies of other businesses or the content of websites that are linked to our website.

#### **6 Security and Storage**

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Fleetwood places great importance on the security of all information of our customers, clients and contractors. We have security measures in place to attempt to protect against the loss, misuse and alteration of personal information under our control.

Personal information is de-identified or destroyed securely when no longer required by us.

Fleetwood retains the information you provide or is provided by another party on your behalf or is collected about you including without limitation for the purposes described above, to enable us to verify transactions and



customer details, and to retain adequate records for legal and accounting purposes. This information is held on secure servers in controlled facilities.

Information stored within our computer systems can only be accessed by those entrusted with authority and computer network password sanctions.

No data transmission over the internet can be guaranteed to be 100% secure. Whilst we strive to protect users' personal information, Fleetwood cannot ensure or warrant the security of any information transmitted to it or from its online products or services, and users do so at their own risk. Once Fleetwood receives your transmission, it makes every effort to ensure its security on its systems.

Ultimately, you are solely responsible for keeping your passwords and/or account information secret.

## **7 Access to and Correction of Personal Information**

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Fleetwood is committed to maintaining accurate, timely, relevant and appropriate information about our customers, clients and website users.

A request for your personal information, which is in accordance with the Australian Privacy Principles, will give you access to that information through our Privacy Officer:

General Counsel & Company Secretary  
Level 2, 464 Hay Street  
Subiaco WA 6008  
Telephone: (08) 9323 3300  
Email: [companysecretary@fleetwood.com.au](mailto:companysecretary@fleetwood.com.au)

Inaccurate information will be corrected upon receiving advice to this effect from you. To ensure confidentiality, details of your personal information will be passed on to you only if we are satisfied that the information relates to you.

If we refuse to provide you with access or correct the personal information held about you by us, then we will provide reasons for such refusal.

## **8 Complaints**

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If you have a complaint about our Privacy Policy, your complaint should be directed in the first instance to us at e-mail: [companysecretary@fleetwood.com.au](mailto:companysecretary@fleetwood.com.au)

We will investigate your complaint and attempt to resolve any breach that might have occurred in relation to the collection, use or destruction of personal information held by us about you in accordance with the Commonwealth Privacy legislation. If you are not satisfied with the outcome then you may request that an independent person (usually the Commonwealth Privacy Officer) investigate your complaint.

## **9 Transfer of Information Overseas**

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Pursuant to the Australian Privacy Principles we may transfer personal information we have collected about you to someone other than you in a foreign country only if such a transfer is permitted by the Australian Privacy Principles. This includes:

- if we are authorised to do so by law;
- when we use or disclose your personal information for any of the permitted purposes set out in this Privacy Policy; or
- if you have consented to us doing so.

Fleetwood and its subsidiaries will, if and to the extent required by the Privacy Act, take reasonable steps to ensure any overseas recipient does not breach the Australian Privacy Principles in relation to your personal information, unless we have a reasonable belief that the overseas recipient is subject to a law or binding scheme which is at least substantially similar to the Australian Privacy Principles and that you have mechanisms to take action to enforce any misuse of your personal information in that location.

When it appears that we are likely to disclose personal information to third parties who are located in a foreign country or countries this policy will be updated to identify that country or countries accordingly.



## **10 Cookies**

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Fleetwood collects information from the internet using 'IP files'. When you visit a Fleetwood website to read, browse or download information, our system will record/log your IP address (the address which identifies your computer on the internet and which is automatically recognised by our web server), date and time of your visit to our site, the pages viewed and any information downloaded. This information will only be used for the purpose of site analysis and to help us offer you improved online service. We may automatically collect non-personal information about you such as the type of internet browsers you use or the site from which you linked our websites. You cannot be identified from this information and it is only used to assist us in providing an effective service on our websites.

## **11 Changes to Privacy Policy**

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If Fleetwood decides to change its Privacy Policy, it will post changes on this privacy policy page so that users are always aware of what information is collected, how it is used and the way in which information may be disclosed. As a result, please remember to refer back to this Privacy Policy regularly to review any amendments.

This Privacy Policy was last updated in September 2022. Future updates will be published at our website from time to time.

## **12 Contacting Us**

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If you require further information regarding our Privacy Policy, contact us at the following address:

General Counsel & Company Secretary  
Level 2, 464 Hay Street  
Subiaco WA 6008  
Telephone: (08) 9323 3300  
Email: [companysecretary@fleetwood.com.au](mailto:companysecretary@fleetwood.com.au)

