

Privacy Policy

Capital Hotel Group respects your privacy

Amendments to the Commonwealth Privacy Act 1988 have extended the application of the National Privacy Principles (Principles) to private entities like the Capital Hotel Group (CHG) of Companies. CHG has always placed great importance on the privacy of personal information it collects and holds, and this Policy is designed to help you to understand how we manage your personal information.

The Policy applies to all companies, subsidiaries, divisions and organisations within the CHG group.

What kind of personal information do we collect?

In the course of our day-to-day business, the CHG group comes into contact with many members of the general public, including but not limited to:

- Purchasers (and prospective purchasers) or our apartments;
- Tenants (and prospective tenants) of our rental properties and guests of our Serviced Apartments;
- Building and Construction Sub-Contractors and Suppliers; and
- Job Applicants, Employees, and Contractors (who may provide for example, references and tax file numbers).

In the course of dealing with members of the public, it is necessary from time to time for CHG to collect personal information. This information may be collected in a number of ways, though typically we receive information from you:

- Speaking to us on the telephone;
- Using our website or sending us an email;
- Completing a form (such as a tenancy application, registration and site entry form or a vendor finance application);
- Meeting with us in person;

In some circumstances we may also receive information about you from a third party (for example, a credit or a job reference).

What do we do with this information?

CHG uses the personal information we collect from you for a number of purposes, all of which are essential for the efficient day-to-day operation of our business. These include:

- First and foremost, communicating with you and providing you with the information, products or services requested by you;
- Managing our business so that we can more accurately tailor the information, products and services we provide for repeat and future customers.
- Assessing Tenancy and Vendor Finance applications;

- Marketing our upcoming projects to existing valued customers and others we believe may be interested in hearing about our information, products or services;
- Complying with our legal and regulatory requirements; and
- Recruiting employees and contractors.

Do we provide the information to anybody else?

In the ordinary course of our business your personal information may be provided to a number of third parties. CHG does not sell personal information or provide it to mailing list companies (information about our customers is one of our greatest assets and we treat it accordingly). Other people who might receive personal information we collect include:

- Other entities and people within the CHG group;
- External service providers who assist us with marketing, and the provision of financial and legal services.
- Insurers, financiers, credit providers, courts, tribunals and regulatory authorities as agreed or authorised by law;
- Credit reporting or reference agencies or insurance investigators; or
- Other people as you may authorise from time to time.

We require that all third parties respect and deal with personal information in accordance with this Policy. Primarily this means respecting its confidentiality and only using it for the purpose for which it was provided.

Sensitive information & other legal restrictions

Sometimes the information we are provided with is of such a private nature that it is classed as "Sensitive information". CHG does not collect very much information of this nature in the day-to-day course of its business however in some circumstances (such as provision of medical history by job applicants) it does come up. In such circumstances, the Principles require that information is used only for the purposes for which it was provided, or a directly related secondary purpose. Tax File Numbers and information we receive from a credit reference or a tenant reference agency are also subject to special legal restrictions.

How do we store personal information?

Safeguarding the privacy of your information is important to us, whether you interact with us personally, by telephone, mail, over the Internet or other electronic media. We hold personal information in a combination of secure computer storage facilities and paper based files and other records and take steps to protect the personal information we hold from misuse, loss, unauthorised access, modification or disclosure.

The Principles also require us not to store personal information longer than necessary. Where we no longer require any personal information that it holds, that personal information should be destroyed or have details which may identify individuals removed.

How do we keep personal information accurate and up-to-date?

We endeavour to ensure that the personal information it holds about you is accurate and up-to-date. We realise that this information changes frequently with changes of address and other personal

circumstances. We encourage you to contact us as soon as possible in order to update any personal information it holds about you. Our contact details are set out below. You have the right to check what personal information about you is held by us.

Under the Principles, you have the right to obtain a copy of any personal information which we hold about you and to advise us of any perceived inaccuracy. The Principles set out some exceptions to this.

To make a request to access information we hold about you, please contact us in writing. We will require you to verify your identity and to specify what information you require. We may charge a fee to cover the cost of verifying the application and locating, retrieving, reviewing and copying any material requested. If the information sought is extensive, we will advise the likely cost in advance and can help to refine your request if required.

Management and security of personal information

We have appointed a National Privacy Compliance Officer to oversee our management of personal information in accordance with this policy and the Commonwealth Privacy Act.

CHG trains its employees who handle your information to respect the confidentiality of customer information and your privacy. CHG regards breaches of your privacy very seriously.

What if you have a complaint?

If you consider that any action of CHG breaches this Privacy Policy or the National Privacy Principles, you can make a complaint through one of the contacts below. We will endeavour to act promptly in response to a complaint.

If you are not satisfied with our response to your complaint, you can phone the Commonwealth Privacy Commissioner's hotline on 1300 363 992. You can contact us about a privacy-related issue by e-mail, phone, facsimile or post :

Attention: Rachael Batkovic, General Counsel

E-mail: rachael@kappelle.com.au

Tel: (02) 62509189

Fax: (02) 62487866

Address: Po Box 215, HALL ACT 2618

Updates to this Policy

CHG's Privacy Policy will be reviewed from time to time to take account of new laws and technology, changes to our operations and practices and the changing business environment. If you are unsure whether you are reading the most current version, please contact us.

This Policy was last reviewed 05 September 2007.