



Privacy Policy

1. POLICY

This Privacy Policy applies to the I. Co Richmond website at <https://www.icorichmond.com.au> (the Website) which is operated by Wilmac Richmond Fund Pty Ltd as trustee for the Wilmac Richmond Fund ("Wilmac- Richmond").

Wilmac-Richmond is bound by the Australia Privacy Principles ('APPs') in the Privacy Act 1988 (Cth) and understands the importance of, and is committed to, protecting your personal information. This Privacy Policy explains how Wilmac-Richmond manages your personal information, including its obligations and your rights in respect of Wilmac-Richmond's dealings with your personal information.

Please take a moment to read Wilmac-Richmond's Privacy Policy as it describes what happens to your personal information (that is, information or an opinion about you, whether true or not, which identifies you or from which your identity is reasonably identifiable) that is collected on the Website.

2. COLLECTION OF YOUR PERSONAL INFORMATION

2.1. Wilmac-Richmond will collect and hold your personal information in a fair and lawful manner, and not in an unreasonably intrusive way.

Where it is reasonably practical to do so, Wilmac-Richmond will collect your personal information directly from you. However, in certain cases Wilmac-Richmond may collect personal information from third parties, including from publically available sources.

2.2. Wilmac-Richmond may collect the personal information you directly give to Wilmac-Richmond through some of the following means:

- when you make an inquiry or order in relation products and services through the Website;
- when you contact Wilmac-Richmond regarding the services you have requested;
- in administering the processing of a purchase from us;
- from other related correspondence (whether in writing or electronically);

- while conducting customer satisfaction and market research surveys;
- when administering any of Wilmac-Richmond's services; and
- as otherwise required to manage Wilmac-Richmond's business.

3. TYPES OF PERSONAL INFORMATION WE COLLECT

- 3.1. The type of personal information Wilmac- Richmond may collect can include (but is not limited to), your name, last name, email address, phone number and postcode.
- 3.2. Where you do not wish to provide Wilmac- Richmond with your personal information, Wilmac-Richmond may not be able to provide you with requested goods or services.

4. PURPOSES FOR HANDLING YOUR PERSONAL INFORMATION

4.1. As a general rule, Wilmac-Richmond only processes personal information for purposes that would be considered relevant and reasonable in the circumstances.

Wilmac-Richmond will only collect information that is necessary for the purposes as described in this Privacy Policy, or other purposes specifically communicated to you. Wilmac-Richmond uses fair and lawful methods to collect personal information.

- 4.2. Wilmac-Richmond collects, holds, uses and discloses personal information to:
- provide you with Wilmac-Richmond's goods and services;
 - manage and administer those goods and services, including account opening procedures;
 - communicate with you regarding a job application;
 - communicate with you regarding the services you have requested;
 - comply with its legal and regulatory obligations; and
 - otherwise to manage Wilmac-Richmond business.

5. USE AND DISCLOSURE OF YOUR PERSONAL INFORMATION

- 5.1. Some of the primary purposes for which Wilmac-Richmond uses and discloses personal information include:
- maintaining customer records;
 - delivery and supply of goods and services;
 - account keeping and invoicing;
 - locating and/or retrieving Wilmac-Richmond's goods; and
 - administering Wilmac-Richmond's accounts with you.
- 5.2. Wilmac-Richmond may also use and disclose your personal information that it collects for a secondary purpose. A secondary purpose is one which is related to the primary purpose of collection. Some of the secondary purposes for which Wilmac-Richmond may collect your personal information include:
- marketing Wilmac-Richmond's goods and services to you;
 - goods and services development;
 - customer and market research; and
 - to keep you informed of any changes to Wilmac-Richmond's business, goods and services or other offerings that may be of interest to you.
- 5.3. Wilmac-Richmond generally does not disclose your personal information to third parties or organisations, unless they are contracted or employed to provide administrative services on Wilmac-Richmond's behalf and are bound by the APPs.
- 5.4. Wilmac-Richmond will not use or disclose your personal information for any other purpose unless you have consented to that use or disclosure.

6. PROTECTION OF PERSONAL INFORMATION

- 6.1. At Wilmac-Richmond, your personal information is treated with the greatest of care. Wilmac-Richmond maintains appropriate physical, procedural and technical security for its offices and information storage facilities so as to prevent any loss, misuse, unauthorized access, disclosure, or modification of personal information. This also applies to disposal of personal information.

- 6.2. Wilmac-Richmond further protects personal information by restricting access to personal information to those who need access to do their job. Physical, electronic and managerial procedures have been employed to safeguard the security and integrity of your personal information.

7. DIRECT MARKETING

- 7.1. Like most business, marketing is important to Wilmac-Richmond's continued success. Wilmac-Richmond has a unique range of products and services that it provides to customers at a high standard. Wilmac-Richmond would therefore like to stay in touch with customers and let them know about new opportunities. Wilmac-Richmond may provide you with information about new products, services and promotions.
- 7.2. Wilmac-Richmond will not disclose your personal information to third parties for marketing purposes.
- 7.3. You may opt out at any time if you no longer wish to receive commercial messages from Wilmac-Richmond. You can make this request by contacting Wilmac-Richmond's Privacy Officer.

8. COOKIES

- 8.1. A cookie is a small text file stored in your computer's memory or on your hard disk for a pre-defined period of time. Wilmac-Richmond uses cookies to identify specific machines in order to collect aggregate information on how visitors are experiencing this website. This information will help to better adapt this website to suit personal requirements. While cookies allow a computer to be identified, they do not permit any reference to a specific individual. For information on cookie settings of your internet browser, please refer to your browser's manual.

9. ACCESSING AND CORRECTING YOUR PERSONAL INFORMATION

- 9.1. You may contact Wilmac-Richmond's Privacy Officer to request access to the personal information that Wilmac-Richmond holds about you and/or to make corrections to that information, at any time. On the rare occasions when Wilmac-Richmond refuses access, you will be provided with a written notice stating the reasons for refusing access. Wilmac-Richmond may seek to recover from you reasonable costs incurred for providing you with access to any of the personal information about you held by Wilmac-Richmond.

- 9.2. Wilmac-Richmond is not obliged to correct any of your personal information if it does not agree that it requires correction and may refuse to do so. If Wilmac-Richmond refuses a correction request, you will be provided with a written notice stating the reasons for the refusal.

10. OVERSEAS TRANSFERS OF PERSONAL INFORMATION

- 10.1. As the internet is a global environment, using the internet to collect and process personal information necessarily involves the transmission of that information worldwide.

Wilmac-Richmond may disclose your personal information to companies that are associated with Wilmac-Richmond overseas.

11. RESOLVING PERSONAL INFORMATION CONCERNS

- 11.1. If you have any questions, concerns or complaints about this Privacy Policy, or how Wilmac-Richmond handles your personal information, please email [Insert details] Wilmac-Richmond's Privacy Officer at or write to:

Angus McQueen
Level 7, 701/710 Yarra St,
South Yarra Vic 3141
T: 03 9804 7984
E: a.mcqueen@wilmacproperties.com.au

- 11.2. Once a complaint has been lodged, the Privacy Officer will respond to you as soon as possible.

- 11.3. You may also lodge a complaint with the Office of the Australian Information Commissioner by telephone: 1300 363 992 or email: enquiries@oaic.gov.au.

12. CHANGES

- 12.1. Wilmac-Richmond reserves the right to change the terms of this Privacy Policy from time to time, without notice to you. An up-to-date copy of the Privacy Policy is available on the I. Co Richmond website at <https://www.icorichmond.com.au> or on Wilmac-Richmond's website at <https://wilmacproperties.com.au/project/richmond>.

The last update to this document was 1 October 2019.