

Group Privacy Policy and members of the Group

Bright & Duggan Group Pty Ltd (referred to as 'Bright & Duggan', 'we' or 'us') includes Bright & Duggan ABN 63 633 379 629 and its subsidiaries.

This Privacy Policy applies to all Bright & Duggan businesses unless that business has adopted a separate policy. This means that this Privacy Policy applies to:

- a. Bright & Duggan Property Group Pty Ltd | ABN 63 633 379 629
- b. Bright & Duggan Pty Ltd | ABN 32 001 554 650
- c. Bright & Duggan (ACT) Pty Ltd | ABN 96 144 703 435
- d. Bright & Duggan (Hunter) Pty Limited | ABN 39 628 534 485
- e. Bright & Duggan (QLD) Pty Ltd | ABN 23 115 369 858
- f. Bright & Duggan (VIC) Pty Ltd | ABN 14 153 626 432
- g. Bright & Duggan Facilities Management Pty Ltd | ABN 99 651 264 569
- h. Active Building Management | NZ BN - 942 905 3111 579
- i. Adpen Strata Pty Limited | ABN 69 164 283 087
- j. Advanced Community Management Pty Limited | ABN 18 121 978 130
- k. AM Strata (Australia) Pty Limited | ABN 77 675 137 121
- l. AM Strata Pty Limited | ABN 63 132 153 578
- m. Brisbay Pty Ltd | ABN 21 117 238 892
- n. Cambridge Management Services Pty Ltd | ABN 67 097 303 752
- o. Cambridge Management Services (Hunter) Pty Limited | ABN 33 628 534 458
- p. Capitol Strata Management (Holdings) Pty Ltd | ABN 95 606 973 773
- q. Capitol Strata Management (Brisbane) Pty Limited | ABN 93 606 974 510
- r. Capitol Strata Management (Gold Coast) Pty Limited | ABN 45 606 975 179
- s. Capitol Strata Management (Redcliffe) Pty Limited | ABN 91 606 976 121

- t. Change Strata Management Pty Ltd | ABN 65 123 332 687
- u. CMS Holdings (Mirvac) Pty Limited | ABN 76 122 843 065
- v. Northshore Strata Management Pty Limited | ABN 50 635 342 504
- w. Place Portfolio Solutions Pty Limited | ABN 56 672 285 086
- x. Professional Building Management | ABN 74 615 105 550
- y. Shift Facilities Management Pty Limited | ABN 73 124 294 140
- z. SSKB Body Corporate Management Pty Ltd | ABN 59 100 137 862
- aa. SSKB Executive Services Pty Ltd | ABN 47 100 074 628
- bb. SSKB Holdings Pty Ltd | ABN 59 100 073 872 SSKB
- cc. Strata Consulting Pty Ltd | ABN 17 076 320 413
- dd. SSKB Tax Compliance Pty Ltd | ABN 56 118 610 736
- ee. Star Building Management Services Pty Ltd | ABN 80 054 260 383
- ff. Stewart Silver King & Burns (Brisbane) Pty Ltd | ABN 49 078 545 329
- gg. Stewart Silver King & Burns (Gold Coast) Pty Ltd | ABN 88 069 399 864
- hh. Stewart Silver King & Burns (NSW) Pty Ltd | ABN 30 098 060 952
- ii. Stewart Silver King & Burns (Sunshine Coast) Pty Ltd | ABN 25 010 953 054
- jj. Stewart Silver King & Burns (Victoria) Pty Ltd | ABN 64 114 836 172
- kk. Stewart Silver King & Burns Pty Ltd | ABN 35 138 492 556
- ll. Structure Building Management Pty Ltd | ABN 59 612 277 853
- mm. Waratah Building Management Pty Limited | ABN 87 159 634 152
- nn. Your Local Strata (Holdings) Pty Limited | ABN 53 669 192 509
- oo. Your Local Strata Inner West Pty Limited | ABN 14 618 617 548
- pp. Your Local Strata Southern Pty Limited | ABN 48 628 421 045
- qq. Your Local Strata Sydney Pty Ltd | ABN 73 657 218 347

We may disclose your Personal Information to the members of the Group, our other related entities and to third parties that provide products and services to us or to you, via us.

Types of information we collect

Some examples of some personal information we might collect are:

- a. name;
- b. address;
- c. contact details (such as telephone numbers, addresses, and email addresses etc.);
- d. date of birth;
- e. job title;
- f. identification details (such as visa and work permit status, driver's license, and/or
- g. passport details;
- h. financial information; and
- i. payment details.

How we will collect and hold your personal information

We only collect and hold personal information by lawful and fair means.

We may collect personal information about you in a range of different ways, including when you:

- a. liaise with us on the telephone;
- b. send us correspondence;
- c. visit and interact with us through our website;
- d. apply for a position within our firm;
- e. provide information for the purposes of financial services our firm provides;
- f. have contact with us in person (e.g. via general networking, via attendance at our education events, or one-on-one meetings).

We will take steps to hold personal information in a manner which is secure and protected from unauthorised access.

Your information may be held in either a physical form or in electronic form on our IT system.

Where stored in electronic form on our IT system, we will take steps to protect the information against modification, disclosure or misuse by including such things as physical restrictions, password protections, internal and external firewalls, intrusion detection, site monitoring processes, and anti-virus software.

We will also endeavour to ensure that our service providers have protection for electronic IT systems and other necessary restrictions.

Disclosure to overseas recipients

We may choose to, if permitted by law, share and/or disclose your personal information with recipients outside of Australia.

We are required to notify you with a list of any countries which personal information may be transmitted to or disclosed where it is practical for us to do so.

At present, personal information is only stored on servers located in Australia.

Bright & Duggan may transfer your personal information to overseas countries including but not limited to the Philippines and India in order to perform one or more of our functions or activities. In these circumstances, we will take reasonable steps to ensure that the overseas recipient does not breach the Australian Privacy Principles in relation to the information.

Personal information may need to be disclosed to external service providers or third parties engaged by Bright & Duggan in order for those service providers to fulfil their service obligations to the firm. For example, outsourcing contractors and individuals who are resident in India who carry out certain tasks and do work for Capitol to assist in the performance of one or more of our functions or activities. Where personal information is disclosed to an external party, Bright & Duggan will take reasonable steps to ensure that the external party treats such information confidentially and in accordance with the Australian Privacy Principles.

