

NOTE: Substantive amendments should not be made to the body of the Privacy Policy without first contacting Bell Legal Group. Please do not hesitate to contact us should you wish to discuss.

Privacy Policy

SPG No 6 Pty Ltd (Flourish Symphony) ACN 682 089 961

General	SPG No 6 Pty Ltd and its related entities (referred to in this document as “we”, “us” or “our”) operate is flourishsymphony.com.au, and any associated mobile applications and our official social media pages (collectively, the “Site”). We recognise that your privacy is very important and we are committed to protecting the personal information we collect from you. The <i>Privacy Act 1988</i> (Cth) (“Privacy Act”), including the 13 Australian Privacy Principles (“APPs”), the <i>Anti-Money Laundering and Counter-Terrorism Financing Act 2006</i> (Cth) (“AML/CTF Act”) and the <i>Anti-Money Laundering and Counter-Terrorism Financing Rules 2025</i> (Cth) (“AML/CTF Rules”), where applicable. This Privacy Policy sets out how we collect, use, disclose and otherwise manage personal information about you..
Collection	Types of information collected We may collect and hold information that personally identifies you or allows us to contact you (“Personal Information”). Personal Information includes, but is not limited to: • your name; • date of birth; • contact details (including address, email address, phone number); • financial information (such as credit card or bank account numbers); • identification and verification information, including copies or details of identification documents; • information about beneficial owners, controllers and authorised representatives; • information relevant to customer due diligence, including whether a person is a politically exposed person and, where required, information regarding source of funds or source of wealth; • sensitive information to assist in the recovery of a lost or forgotten password; • information about how you use our products and services; • information that your browser sends us when you visit the Site (“Log Data”). Log Data includes information such as your computers internet protocol (“IP”), browser type, operating system, device identifiers, approximate location, the pages of the Site you visit, referring website, how long you spend on those pages, the time spent on pages and other website usage information;

- information you provide when making enquiries about properties or developments, requesting appraisals, registering your interest in a property or development, booking inspections or open homes, subscribing to newsletters or marketing updates, submitting online enquiry forms or otherwise interacting with us through the Site or our social media pages; and
- CCTV footage where you attend on of our offices, display suites or developments monitored for security purposes (where applicable).

This is not an exhaustive list. We may need to collect additional information about you from time to time to provide products or services to you.

Purpose of collection

The type of personal information that we collect and hold about you depends on your interaction with us. Generally, we will collect, use and hold your personal information for the purposes of:

- providing products or services to you or someone else you know;
- responding to enquiries to properties, developments, leasing, property management and associated services;
- issuing tax invoices for the products or services we may provide to you from time to time;
- providing you with information about other services that we, our related entities and other organisations that we have affiliations with, offer that may be of interest to you;
- facilitating our internal business operations, including the fulfilment of any legal requirements;
- complying with our obligations under applicable anti-money laundering and counter-terrorism financing laws, including customer identification and verification, customer due diligence, ongoing monitoring, record keeping and reporting obligations; and
- analysing our services, customer needs and website usage with a view to developing new or improved our products, services, marketing activities and customer experience.

Method of collection

Personal information will generally be collected directly from you through the use of any of our standard forms, online enquiry forms, inspection registrations, newsletter subscriptions, email correspondence, telephone enquiries, social media interactions and when you otherwise communicate with us. We may also collect information other than directly from you where it is unreasonable or impractical to not do so, for example:

- from third parties such as our related entities, business partners, or your representatives;
- from publicly available sources of information;
- from our records of how you use our services; and
- from the third parties we list in the section of this policy with the heading "Use and disclosure".

	We will usually notify you in advance when we indirectly collect information, or where that is not possible, as soon as reasonably practicable after the information has been collected. If you choose not to provide certain information about you, we may not be able to provide you with the products or services you require, or the level of service on which we pride ourselves. Where we collect your consent to receive marketing communications electronically, we will seek consent through a clear affirmative action. If the personal information you provide to us is incomplete or inaccurate, we may be unable to provide you, or someone else you know, with the products or services you, or they, are seeking. Internet users If you access our website, we may collect additional personal information about you in the form of your IP address and domain name. Our Site uses cookies and similar technologies to distinguish you from other users, remember your preferences, improve website functionality, analyse website traffic and enhance your experience while using the Site. . Cookies generally do not identify you personally. However, they may be linked with personal information we already hold about you. You may configure your browser to disable cookies, although doing so may affect the functionality of the Site. Our website may contain links to other websites. We are not responsible for the privacy practices of linked websites and linked websites are not subject to our privacy policies and procedures. Google Analytics We may use third party analytics provides (including Google Analytics) to collect information about how visitors use our Site. This information assists us to monitor website performance, improve functionality and better understand user behaviour.. Information collected by Google Analytics is handled in accordance with Google's Privacy Policy. Information regarding Google's privacy practices is available at: https://policies.google.com/privacy. You may opt out of Google Analytics by disabling the use of cookies or by using the opt-out service provided by Google at: https://tools.google.com/dlpage/gaoptout. Social Media We maintain provides on various social media platforms. Information you provide us through those platforms may be collected and used in accordance with this Privacy Policy. Your use of those platforms is also subject to the privacy policies of the relevant social media provider.
Use and disclosure	Generally, we only use or disclose personal information about you for the purposes for which it was collected (as set out above) or for purposes which are directly related to one or more of our functions and activities. We may disclose personal information about you to: • third party service providers, who assist us to operate our business, including information technology providers, cloud hosting providers, website developers, customer relationship management (“CRM”) providers, email marketing providers, payment processors, marketing providers, identity verification, screening and due diligence providers, and other professional advisers;

	• third party trade promotion prize suppliers where disclosed to you; • our related entities and other organisations with whom we have affiliations so that those organisations may provide you with information about services and various promotions; • a purchaser of the assets and operations of our business, if those assets and operations are purchased as a going concern; and • AUSTRAC, law enforcement agencies, government agencies and departments when required to do so by law, from time to time. Some of our third party providers (including cloud hosting, customer relationship management, website hosting and email service providers) may store or process personal information outside Australia. Where this occurs, we will take reasonable steps to ensure those providers handle personal information in accordance with the Privacy Act or otherwise permitted by law.
Anti-Money Laundering and Counter-Terrorism Financing (AML/CTF)	As part of providing certain services, we may be required to comply with the AML/CTF Act and AML/CTF Rules (collectively, “AML Obligations”). Where these AML Obligations apply, we may collect, use and verify personal information and, where relevant, information about beneficial owners, controllers, authorised representatives, politically exposed persons and the source of funds or source of wealth. This may include collecting copies of identity documents and conducting electronic identity verification, screening or other due diligence checks using third-party service providers where reasonably necessary for us to comply with our AML Obligations. We may also be required to: • conduct ongoing customer due diligence throughout our relationship with you; • request additional information or documentation from you from time to time; • retain records for the periods required by law; • disclose information to the Australian Transaction Reports and Analysis Centre (“AUSTRAC”), law enforcement agencies or other government authorities where required or authorised by law; and • decline to provide certain services, or suspend or terminate the provision of those services, where we are unable to satisfy our obligations under applicable AML/CTF legislation. In certain circumstances, the AML/CTF Act may prohibit us from informing you that a report has been made to AUSTRAC or that certain enquiries or investigations are being undertaken. We collect, use, disclose and store personal information in accordance with our AML Obligations, other legal obligations and this Privacy Policy. Where we engage third-party identity verification or screening providers, those providers may collect and process your personal information on our behalf for the purpose of assisting us to comply with our legal obligations.

How we use your information for Direct Marketing	We may also use your information to provide you with information about our products, services, properties, developments, promotions, events and other opportunities that may be of interest to you where permitted by law. We will only send commercial electronic messages in accordance with the Privacy Act, the APP's and the <i>Spam Act 2003</i> (Cth), including where: • you have provided your express or implied consent; • you would reasonably expect to receive those communications; or • we are otherwise authorised by law to do so. Every commercial electronic message we send will include a clear and functional unsubscribe facility. You may withdraw your consent or unsubscribe from receiving marketing communications at any time using the unsubscribe facility contained within the communication or by contacting us using the details below. We will process unsubscribe requests within the time required by applicable law. Unsubscribing from marketing communications will not prevent us from sending communications that are necessary to provide our products or services or otherwise permitted by law.
How we hold your personal information	The security of your personal information is of paramount importance to us. We store your personal information in different ways, including in paper and in electronic form. Any bank or credit card details you provide and that we store will be encrypted, and any tax invoices we issue to you will not display your full bank or credit card details. We take reasonable administrative, technical and physical safeguards to protect your personal information against misuse, interference, loss, unauthorised access, modification and disclosure. These measures may include secure servers, encryption, password protection, access controls and other appropriate security measures. If we no longer need your personal information for the purposes for which it was collected or for purposes which are directly related to one or more of our functions and activities, we will take reasonable steps to securely destroy it or permanently remove all identifying features from that information. This obligation is subject to any legal requirement or Court order to retain the information, including any record-keeping obligations under applicable AML/CTF legislation.
Data breach notification	We accept our obligation to keep personal information safe. Should personal data systems be breached or data is misused or lost, then we will take all reasonable and practicable means to contact individuals whose personal information is involved. We will advise such individuals of the extent of the data breach (if known) and advise individuals of the most appropriate means of regaining control of their personal information. If appropriate, we will also report any eligible data breach to the Office of the Australian Information Commissioner in accordance with the Privacy Act.
How you can access your	You may access the personal information we hold about you, upon making a written request. We will respond to your request within a reasonable period. We take all reasonable steps to ensure that the

personal information	personal information we hold, use and disclose is accurate, complete and up to date. We may decline a request for access to personal information in circumstances prescribed by the Privacy Act, and if we do, we will give you a written notice that sets out the reasons for the refusal (unless it would be unreasonable to provide those reasons). If, upon receiving access to your personal information or at any other time, you believe the personal information we hold about you is inaccurate, incomplete or out of date, please notify us immediately. We will take reasonable steps to correct the information so that it is accurate, complete and up to date. If we refuse to correct your personal information, we will give you a written notice that sets out our reasons for our refusal (unless it would be unreasonable to provide those reasons), including details of the mechanisms available to you to make a complaint. If you wish to access any of your personal information that we hold or would like to correct any errors in that information, please contact us using the contact details set out in the Contact section of this policy, so that we can consider and respond to your request. We may apply an administrative charge for providing access to your personal information in response to a request.
Transfer of personal information internationally	If you are located outside of Australia, you acknowledge and understand that your personal information will be transferred, processed and stored in Australia in accordance with this privacy policy. Australian privacy laws may not be as protective as those in your jurisdiction. When we disclose personal information in accordance with this privacy policy, it may be accessed from, transferred to, and/or stored outside the country in which you are located. The privacy laws in that country may be of a lower standard than those in your own country. We will use our best endeavours to safeguard your personal information in accordance with this privacy policy.
Complaints	If you believe we have breached the Privacy Act or the Australian Privacy Principles, you may contact our Privacy Officer using the contact details below. We will acknowledge your complaint within a reasonable time, investigate the complaint and provide you with a written response. If you are not satisfied with our response, you may lodge a complaint with the Office of the Australian Information Commissioner.
Contact	If you have any queries or concerns about our privacy policy or the way we handle your personal information, please contact our privacy officer at: Email address: hello@sherpagroup.com.au Street address: Suite 2 Level 1, 1928 Gold Coast Highway Miami Q 4220
Changes to our privacy and information handling practices	This privacy policy is subject to change at any time. Please check our privacy policy on our website, flourishsymphony.com.au regularly for any changes.

More information

For more information about privacy in general, you can visit the Office of the Australian Information Commissioner website at www.oaic.gov.au.