



# PRIVACY POLICY

## 1. PRIVACY POLICY

The protection of your Personal Information is something that Scape Australia Management Pty Ltd (ACN 603 368 609) and its related entities (collectively "**Scape**", "**we**", "**us**" and "**our**") take very seriously.

This Policy describes how we manage your Personal Information in accordance with the Australian Privacy Principles contained in the *Privacy Act 1988* (Cth) ("**Privacy Act**").

This Policy also applies to the collection and processing of your Personal Information if you are an individual in a country that is a member of the European Economic Area ("**EEA**") by or on behalf of Scape, to the extent the General Data Protection Regulation (EU) 2016/679 ("**GDPR**") applies. For the purposes of GDPR, we are a 'data controller' and we are responsible for, and control the processing of, your Personal Information. Information about a person from which that person is reasonably identifiable, whether or not it is true, is generally referred to throughout this policy as "**Personal Information**".

This Policy provides important information in relation to:

- your rights arising under the Privacy Act and, where applicable, the GDPR;
- what Personal Information we collect;
- what we do with your Personal Information;
- with whom your Personal Information may be shared; and
- how we will respond to requests for access, correction or complaints about privacy.

From time to time and for any reason we may revise our information handling practices and this Policy. This Policy will be updated to reflect any changes made and published on [www.scape.com/en-au/](http://www.scape.com/en-au/) ("**Website**").

If you have any questions about this Policy or the Personal Information we hold about you, please contact our Privacy Officer (see "Contact Information" below).

## 2. WHAT PERSONAL INFORMATION WE COLLECT

This Policy only applies to the collection and use of your Personal Information by Scape and those third parties authorised by Scape. This Policy does not cover third party websites to which we may provide links, nor does it cover advertisers. These third parties may have their own privacy policies and/or terms and conditions of use which you should refer to. See "Links to Third Party Services and Websites" below for more information.

Personal Information is defined in section 6 of the Privacy Act as information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- whether the information is true or not; and
- whether the information or opinion is recorded in a material form or not.



We collect Personal Information to the extent that it is reasonably necessary for one or more of our functions or activities, including our accommodation services and related services. The kinds of Personal Information that we collect and hold include:

- name;
- date of birth;
- address and/or location;
- telephone and/or mobile number;
- identification documents, including driver's licence, passport details and student identification;
- your image;
- email and/or IP address;
- course enrolment and visa status information;
- emergency contact details;
- bank account or credit card details;
- details of your preferences, interests and opinions; and
- details relevant to your dealings with us and/or the services we provide.

### **3. PERSONAL INFORMATION ABOUT OTHER INDIVIDUALS**

We may also hold Personal Information that you provide to us about other individuals e.g. Personal Information about your spouse, partner, parent, guardian, friend, referee or someone living with you. We rely on you as our customer to inform those individuals that their Personal Information is being provided to us and that they may contact us for further information.

### **4. SENSITIVE INFORMATION**

Under the Privacy Act, "**Sensitive Information**" includes but is not limited to information or an opinion about an individual's racial or ethnic origin, religious belief, or criminal record and health information about an individual. In many cases, we will not collect or hold Sensitive Information about you. However, in certain circumstances and provided we have obtained your consent or where it is required or authorised by or under an Australian law or court/tribunal order, we may collect and hold Sensitive Information (e.g. health information) about you or someone living with you.

Any Sensitive Information will be collected with your consent for the purpose notified to you at the time and only to the extent that you authorise us or where we are legally permitted to do so, including if it is needed for your vital interests or the vital interests of another individual.

### **5. HOW WE COLLECT PERSONAL INFORMATION**

We collect Personal Information in a number of ways, including:

- when making a booking and/or entering into a contract or agreement with us;
- records of our other communications and interactions with you;
- customer survey or market research activities;
- the marketing of our products and services;
- your enquiries; and



- our Scape Australia Website and/or the Scape Australia App (“App”) (including information you enter onto our Website and/or the App). Please see the “Collection of Personal Information Through Website and App Activity” for more information.

We generally collect Personal Information directly from you, unless it is unreasonable or impracticable to do so. We may also collect Personal Information about you from third parties such as education suppliers, universities, residential tenancy databases and other sources necessary to identify and evaluate a potential tenant market data research firms, your representatives, your referees and contractors providing services to you or us.

## 6. COLLECTION OF PERSONAL INFORMATION THROUGH WEBSITE AND APP ACTIVITY

We collect the Personal Information that you enter onto our Website and/or the App. We may also collect information about you that is not Personal Information (such as your username, if it is not your actual name, and browser details) or in some circumstances Personal Information about you when you interact with us online or via an app (including when you visit a different Scape website or the App) or when you mention the brand name “Scape” or our products via external social media platforms (e.g. Facebook or Twitter). Any Personal Information that we may collect from social media platforms is determined by the privacy settings of your account within the social media platform (that is, the extent to which your Personal Information is publicly available on the social media platform) and the content of your post.

Our Website and App include pages that use cookies, which are small amounts of data sent by our Website/App and other third parties and stored by your browser. This allows our servers to recognise your device when you visit our Website/App in the future. Cookies do not in themselves identify you as an individual although they do identify your browser type, the operating system you are using, the web page you visited, your internet service provider and your State location.

Our Website/App use Google Analytics, a web analytics service provided by Google, Inc. (“Google”). We may, at any time, change to a different provider that offers a similar platform as Google. Google Analytics also uses cookies to help the Website/App analyse how users use the site/App. The information generated by the cookie about your use of our Website/App (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the Website/App, compiling reports on Website/App activity for Website/App operators and providing other services relating to Website/App activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google’s behalf. No Personal Information is collected or transmitted to Google for the purposes of Google Analytics.

By using our Website/App, you consent to the processing of data about you by Google in the manner and for the purposes set out above. For more information about how Google collects and processes data, please see Google’s privacy policy and their information at [www.google.com/policies/privacy/partners](http://www.google.com/policies/privacy/partners).

You can configure your internet browser to accept all cookies, reject all cookies or notify you when a cookie is sent. If you refuse the use of cookies in this way you may not be able to see the full functionality of our Website/App. Please refer to your internet browser’s instructions or help screens to learn more about these functions.



To assess the effectiveness of our Website/App design and layout, as well as monitor traffic to the Website/App we may contract with third parties to collect statistical data. However, no Personal Information is collected during this process.

## **7. HOW WE USE PERSONAL INFORMATION**

We collect, hold and use your Personal Information for the purposes of our business operations and activities, including:

- assessing your application for tenancy at a Scape property;
- providing accommodation and related services to you, including through the use of a third party service provider and/or via the App;
- communicating with you including facilitating responses to your enquiries or complaints;
- communicating with you via the App;
- verifying your identity, address and other details;
- contracting with you and processing payments;
- conducting debt recovery activities (including through a debt collection agency);
- conducting customer surveys;
- gathering and aggregating information for statistical and modelling purposes, including customer segmentation processes;
- developing and improving our services;
- managing performance and compliance with our contractual and regulatory obligations and assessing that compliance through independent audits;
- maintaining and updating our records;
- contacting you to obtain your feedback or comments on our products and services; and
- facilitating acquisitions and potential acquisitions of our business.

After using reasonable efforts to recover outstanding amounts owed by you to us, if there are still outstanding amounts owing, we may disclose your rental default information to residential tenancy databases and/or debt collection agencies.

We also use your Personal Information to provide you with information on products and services that we or third parties offer, as well as offers, competitions and other marketing information that we consider may be relevant to you or that you might be interested in, even after you cease acquiring products or services from us. If you use the App, this may include push notifications to tell you about offers, events, updates and our products and services that may be of interest to you. You can tell us if you do not want to receive such information by contacting us using the "Contact Information" listed below. Subject to the configuration options available on our device, you may also decline marketing messaging sent by push notifications by refusing the relevant permissions in your device settings, however this may also prevent you from receiving updates via push notifications on the App.

## **8. HOW WE DISCLOSE PERSONAL INFORMATION**

We may disclose your Personal Information to third parties that help us provide services to you as our customer. Third parties that we may disclose your Personal Information to include:

- your authorised representative, parent or guardian;



- Scape contractors, suppliers and agents who assist Scape in providing products and services to you (e.g. billing providers, call centre, customer management, data storage, delivery, data processing, data analysis, document management, information broking, research, investigation, insurance, website, mobile application and technology services);
- financial institutions for payment processing and billing activities;
- credit providers and agencies;
- other organisations who, in conjunction with us, provide the services or assist in providing services to our assets;
- Scape's related entities and/or partners;
- the relevant Bond Authority;
- third party operators of residential tenancy databases;
- Government agencies, regulatory authorities or enforcement bodies (e.g. Australian Federal Police) where required or authorised by law;
- our professional advisers, including independent auditors we engage to ensure the integrity of our operations; and
- debt collection agencies.

We may also collect your Personal Information from these types of third parties.

## **9. OVERSEAS USE OR DISCLOSURE OF PERSONAL INFORMATION**

Scape is part of an international network of companies which trade under the Scape name ("**Member Companies**").

We may disclose your Personal Information to Member Companies or other entities overseas where it is reasonably necessary to help us fulfil the purpose for which the Personal Information was collected, or a related or ancillary purpose or otherwise in accordance with the Privacy Act and, where relevant, the GDPR. The countries to which such disclosures are made, and types of Personal Information disclosed, depend on the specific circumstances of the engagement.

We may also store, process or back-up your Personal Information on secure servers that are located overseas (including through third party service providers). These servers are commonly located in the United Kingdom.

Where we transfer Personal Information between countries, we will only do so with relevant protections in place, to ensure your Personal Information is protected in accordance with applicable laws and this Policy. We may require your further consent to transfer your Personal Information outside of Australia or the EEA, although we do not expect to transfer your Personal Information outside these jurisdictions.

## **10. HOW WE HOLD AND KEEP SECURE PERSONAL INFORMATION**

We typically hold the Personal Information we collect on electronic databases located in Australia.

We are committed to keeping secure the Personal Information you provide to us. We take precautions to protect the Personal Information we hold about you from misuse, loss, interference, theft and from unauthorised access, modification or disclosure.

Depending on the circumstances, our security measures may include, but are not limited to:



- educating our employees about their obligations with regard to your Personal Information;
- ensuring our employees and outsourced service providers use passwords when accessing our systems;
- using secure networks or encryption when transmitting electronic customer data;
- storing Personal Information in secure, encrypted data centres;
- requiring third parties we engage to provide appropriate assurances that such parties will handle your Personal Information in a manner consistent with the Privacy Act and, where relevant, the GDPR; and
- compliance with payment card industry security standards with respect to the storage and transmission of payment card details.

## **11. HOW WE HANDLE REQUESTS FOR ACCESS TO PERSONAL INFORMATION**

You can request access to details of the Personal Information that we hold about you at any time by contacting our Privacy Officer (see "Contact Information" below).

We will respond to any such request for access as soon as reasonably practicable and in any event will acknowledge receipt within ten business days of receiving your request. We may require you to set out the request in writing. In most cases, we will try to provide with you a copy or details of your Personal Information in the manner requested. Otherwise, we will work with you to find a mutually agreed alternative. If, after exploring all options, we cannot provide you with access to the information in the form requested, or have other lawful grounds, we will provide a written statement setting out our reasons for refusal.

## **12. CORRECTION AND DELETION OF PERSONAL INFORMATION**

We may not be able to provide you with the services you are seeking if you provide incomplete or inaccurate Personal Information. If you believe the Personal Information we hold about you is inaccurate, incomplete or outdated, please contact us using the details listed above so that we can correct it.

To the extent we are subject to the GDPR, if you would like us to delete Personal Information we have collected from you, please contact us using the details listed above. Please note that we may be required by law to retain certain Personal Information. Before we are able to provide you with any information, correct any inaccuracies, or delete Personal Information, we may ask you to verify your identity and/or provide other details to help us respond to your request.

## **13. DIRECT MARKETING**

If at any time you decide you do not wish to receive marketing communications from Scape, just let us know by contacting us using the Contact Information below.

If you have opted-in to marketing communications, you may subsequently elect not to receive marketing communications from Scape by following the opt-out instructions in the marketing communications we send you, sending a message through the contact feature on our Website or contacting us using the Contact Information listed below. Please note that if you opt out of receiving marketing communications from us, we may still send communications to you concerning your account(s) with Scape.

## **14. OBJECTING AND PORTABILITY – YOUR RIGHTS**



To the extent we are subject to the GDPR, you may have the right to request in some circumstances that any further processing of the Personal Information you have provided to us be restricted, or you may object to such further processing. You may also have the right to have the Personal Information you provided to us transferred to another party.

## **15. LINKS TO THIRD PARTY SERVICES AND WEBSITES**

Should you decide to stay at a Scape property and/or use the App, you will be offered services from third party providers who may collect Personal Information from you. These services are not operated by Scape and if you use these services you should review the providers' website privacy policy, terms and conditions, and other policies. We are not responsible for the policies and practices of third parties. Any information you submit to those third parties is subject to their privacy policy, terms and conditions, and other policies.

## **16. RETENTION OF PERSONAL INFORMATION**

If we determine that Personal Information we hold about you is no longer required, we will take reasonable steps to destroy or de-identify it to the extent required by law.

The periods for which we keep your Personal Information will vary according to the purpose for which we use the Personal Information. Unless there is a specific legal requirement to keep your Personal Information, we will not keep it for longer than necessary for the purposes for which the Personal Information was collected or for which it is to be further processed.

## **17. CONTACT INFORMATION**

Should you have a query about this Policy, request for access or correction or complaint, please contact us on any of the methods below:

**Postal Address:** Attention: Privacy Officer  
Scape Australia Management Pty Ltd, Level 30, Governor Macquarie Tower,  
1 Farrer Place, Sydney NSW 2000

**Email:** [privacy.au@scape.com](mailto:privacy.au@scape.com)

**Phone:** (02) 9098 8800

If you have a complaint, we encourage you to inform us so that we can have the opportunity to remedy the issue and find a solution. We will aim to resolve your complaint within five business days from when we receive your complaint in writing. There may be times when we need a bit longer to investigate the complaint and respond to you but we will contact you within five business days to give you an update and let you know when we think we'll find the answer or solution. We will also confirm how frequently you would like to be updated moving forward.

If you are unsatisfied with the handling of your complaint, you may lodge a complaint with the Office of the Australian Information Commissioner ("OAIC"). For more information about making a complaint to OAIC, visit [www.oaic.gov.au/privacy/making-a-privacy-complaint](http://www.oaic.gov.au/privacy/making-a-privacy-complaint).