

## **PRIVACY POLICY**

### **Bellevue Tops Pty Ltd ATF Bellevue Tops Trust ABN 17 658 029 575 (“Bellevue”)**

Bellevue Tops Pty Ltd ATF Bellevue Tops Trust ABN 17 658 029 575 (“Bellevue”) is committed to protecting the privacy of the people having contact with Bellevue. This document summarises the main features of Bellevue's privacy policy.

### **Your privacy is important to us**

Bellevue is committed to upholding the National Privacy Principles contained in Privacy Act 1988 (Commonwealth).

### **The information Bellevue collects about you**

Bellevue collects and retains personal information including your name, address, telephone number, email address, age, gender, and occupation. We are committed to keeping your information safe. We use appropriate security measures and technology to protect your personal information.

### **The use of your information**

We use your information in providing products and services, processing your payment, and security. You are not obliged to give us your personal information. However without this information we may not be able to provide you with the full range of our services, or we may not be able to provide you with a full range of payment options.

We will not sell or trade your information to another organisation without your consent.

## **IMPORTANT DISCLAIMER**

The seller Bellevue and its agents do not guarantee, warrant or represent that the information contained in the web site or in any associated marketing documents, including plans is correct. Any interested parties should make their own enquiries as to the accuracy of the information. We exclude all inferred or implied terms, conditions and warranties arising out of this document and any liability for loss or damage arising there from. As this is a project yet to be built, any plans are in draft form only and subject to final survey and material is included as a representation only.

## **Cookies and related technologies**

This website uses third parties (such as AdRoll) that may place cookies on user's web browsers for targeted advertising purposes as well as for the purposes of reporting and analytics. Cookies are text files that are placed on your device. These third parties may collect data such as IP addresses, cookie identifiers and website activity to target advertising on other sites based on the user's online activity.

You may choose to opt out of targeted advertising by following the instructions on the Office of the Australian Information Commissioner website

<https://www.oaic.gov.au/individuals/privacy-fact-sheets/general/privacy-fact-sheet-4-online-behavioural-advertising-know-your-options>

## **Sharing your information**

To help us provide services to you, we may need to furnish your personal information to other organisations (such as credit reference companies). If we need to furnish another organisation with access to your personal information, we require that organisation to keep the personal information secure, and to use it only for the appropriate purpose. We will not sell or trade your information to another organisation without your consent.

## **Better service**

Bellevue takes all reasonable precautions to ensure that the personal information we collect, use and disclose is accurate, complete, and up to date. To a large extent the accuracy of that information depends on the information you provide. To help us keep your personal information up to date, please let us know of any changes to your personal details.

Bellevue aims to provide you with a full range of its services, products and options. From time to time Bellevue may notify you about additional products or services. You may ask us not to receive information on these additional products and services by contacting Bellevue.

If you would like further information on Bellevue's privacy policy, or would like to obtain a copy of Bellevue's privacy policy, please visit our website at [www.bellevuetops.com.au](http://www.bellevuetops.com.au) or contact Bellevue at Suite 310, 460 Pacific Highway St Leonards NSW 2065

## **Access Policy**

Our conduct under this policy is governed by the following principles.

- Requests for access are treated seriously.

- Requests will be dealt with promptly, and confidentially.
- Your request to access your personal information will neither affect your existing obligations nor any arrangements between you and Bellevue.

### **You can access your personal information**

Bellevue will provide access by allowing you to inspect, take notes of, and receive copies or print-outs of the personal information which Bellevue holds about you.

If you wish to access the personal information we hold about you, please contact Bellevue at Suite 310, 460 Pacific Highway St Leonards NSW 2065

To obtain access you must provide proof of your identity. This is necessary to ensure that personal information is provided only to the correct individuals, and that the privacy of others is not undermined.

Bellevue reserves the right to charge you a fee for searching for, and providing access to, your information.

### **When will access be denied?**

Access will be denied if:

- The request does not relate to the personal information of the person making the request;
- Providing access would pose a serious and imminent threat to the life or health of a person;
- Providing access would create an unreasonable impact on the privacy of others;
- The request is frivolous and vexatious;
- The request relates to existing or anticipated legal proceedings;
- Providing access would prejudice negotiations with the individual making the request;
- Access would be unlawful;
- Denial of access is authorised or required by law;
- Access would prejudice law enforcement activities;
- Access discloses a commercially sensitive decision-making process or information; or
- The refusal is justified by the National Privacy Principles.

Where possible, Bellevue will favour providing access. Bellevue may do so by providing access to the appropriate parts of the record, or by using an appropriate intermediary.

A dispute about the right, or forms, of access will be dealt with in accordance with Bellevue's grievance policy.

### **Time**

We will take all reasonable steps to provide access within 30 days of your request. If the request is not complicated, or does not require access to a large amount of information, we will try to provide the information within 14 days.

## **Privacy Complaints**

### **How we handle privacy complaints**

#### **Introduction**

Bellevue understands the importance of privacy to Bellevue, its customers and other stakeholders. Bellevue is committed to protecting the privacy of the personal information that we hold. This is part of Bellevue's:

1. Legal obligations under Privacy Act 1988 (Cwlth);
2. Ethical and business obligations; and
3. Service to you.

Bellevue places a high priority on effectively dealing with complaints about privacy.

#### **Overriding principles**

Bellevue's conduct under its privacy complaints policy is governed by the following principles.

- Complaints are treated seriously.
- Complaints will be dealt with promptly, and confidentially.
- A privacy complaint will neither affect your existing obligations nor any commercial arrangements between you and Bellevue.

#### **Who may complain under this policy?**

If you have provided Bellevue with personal information, then you are entitled to:-

1. Make a complaint;
2. Have your complaint investigated; and
3. Have your complaint dealt with under Bellevue's privacy complaints policy.

#### **What is a privacy complaint?**

A privacy complaint relates to a concern or dispute you have with our privacy practices as it relates to your personal information. This could include matters such as:

1. How your personal information is collected;
2. How your personal information is stored;
3. How your personal information is used or disclosed; and
4. How access is provided.

### **What do I do if I have a complaint about privacy practices?**

If possible Bellevue resolves grievances at the local level. If you have a complaint about Bellevue 's privacy practices, please contact Bellevue.

All complaints will be logged on Bellevue's database/complaints register.

You may complain orally or in writing. If your privacy complaint is not resolved, the matter will then be referred to the next level of management.

### **Grievance procedure**

Bellevue's grievance policy seeks to achieve an effective resolution of your complaint within a reasonable time.

After your complaint has been made, the following steps may occur.

#### 1. Request further information

Bellevue may request further information from you. You should be prepared to give as much details as possible, including details of any relevant dates and documentation. This will enable Bellevue to investigate your complaint, and determine an appropriate and useful solution. All details provided will be kept confidential.

#### 2. Discuss options

Bellevue will discuss options for resolution. If you have suggestions about how the matter might be resolved, you should discuss these with Bellevue. Bellevue may suggest different solutions, or may offer examples of how the personal information can be revised or stored in a different manner.

#### 3. Investigation

Your complaint may be investigated. Bellevue will try to do so within 72 hours, or as quickly as possible. Sometimes Bellevue may need to contact other parties as part of its investigation.

#### 4. Discussion with any other parties

If your complaint deals with the conduct of an employee, Bellevue will discuss the matter with the employee concerned, and seek the employee's comments and input in the resolution of the

complaint, and Bellevue's investigation.

5. Escalate internally

If your complaint can't be resolved, it will be referred to the next appropriate level of management. Bellevue will discuss this with you before the referral.

6. The complaint is resolved

If your complaint is found to be substantiated, Bellevue will inform you of the reason for the decision. Bellevue will then take appropriate steps to resolve the complaint, and prevent the problem from recurring.

7. If your complaint is not substantiated, or cannot be resolved to your reasonable satisfaction, but Bellevue's policy has been followed, the decision of Bellevue's management will be final. Bellevue will discuss with you the reason for Bellevue's decision.

8. If there is still disagreement, your complaint will be dealt with by a mutually agreed independent intermediary.

9. If after all of the above steps have been followed your complaint is unresolved, you may refer your complaint formally to the Federal Office of the Privacy Commissioner.

## **Records**

Bellevue will keep a record of your complaint and the outcome.

## **Anonymous complaints**

Bellevue will not reply to anonymous complaints. Anonymous complaints cannot be investigated properly or followed up.

If an anonymous complaint is received, Bellevue will consider the complaint, and attempt to resolve the issues appropriately. For example, Bellevue may conduct further training of its staff, officers, or associates.

## **Information**

If you would like further information on Bellevue's policies, please contact Bellevue at Suite 310, 460 Pacific Highway St Leonards NSW 2065