

Privacy Policy - As at 14 March 2017

Clifford Gardens Shopping Centre General Privacy Policy

Your privacy is important to Clifford Gardens Shopping Centre

Clifford Gardens Shopping Centre recognises the trust you are placing in us through your dealings with us. We are committed to the protection of your personal information. Our policies comply with our obligations under the Australian Privacy Principles that form part of the Privacy Act 1988 (Cth) (Australia), and are intended to protect your privacy in respect of any personal information that you may provide to us.

Glass Sub TC Pty Ltd as Trustee for Glass Clifford Trust ABN 23 318 856 072 may collect personal and other information in the circumstances set out below, either directly or through their authorised agents and subcontractors. We refer to each of these entities in this policy as "us", "we", or "Clifford Gardens Shopping Centre".

What personal information Clifford Gardens Shopping Centre generally collects and why:

Customers

Clifford Gardens Shopping Centre collects information from customers in a number of different ways. These include the following:

- In connection with competitions or signing up to email or mobile newsletters (either while in one of our shopping centres ("in-centre") or online), customers provide us with their contact details. Your name and address are automatically entered into Clifford Gardens Shopping Centre's database when you enter competitions. Clifford Gardens Shopping Centre collects these details to contact competition winners, and to inform customers about events, activities and promotions, both in centre and as part of Clifford Gardens Shopping Centre's other activities. Customers have the option to opt out from receiving this information.
- When customers hire mobility aids or other equipment from Clifford Gardens Shopping Centre, or apply to use certain restricted spaces at Clifford Gardens Shopping Centre customers provide Clifford Gardens Shopping Centre with certain information, including contact details. Clifford Gardens Shopping Centre collects this information to ensure that there is a record of the hirer and to enable customers to be informed about upcoming events, activities and promotions, both in centre and as part of Clifford Gardens Shopping Centre's other activities.
- When customers attend Clifford Gardens Shopping Centre and its car parks under video and camera surveillance. When entering Clifford Gardens Shopping Centre and its car parks, customers' personal information, car licence plate details and images may be collected by Clifford Gardens Shopping Centre, and Clifford Gardens Shopping Centre may also collect customers' personal information and images from third parties (for example, the police or retailers) in connection with the management and security of Clifford Gardens Shopping Centre This information may be used by Clifford Gardens Shopping Centre in connection with the management

Privacy Policy - As at 14 March 2017

and security of Clifford Gardens Shopping Centre. This information may be provided to law enforcement and government bodies, Clifford Gardens Shopping Centre staff and subcontractors, third parties who provide Clifford Gardens Shopping Centre with services from time to time, insurers and retailers for those purposes.

- When customers park in Clifford Gardens Shopping Centre's car parks with a ticketless parking system or car locator functionality, customers consent to provide us with their car licence plate details and, in some circumstances, other information including name, email address and telephone number. These details are used for measuring and analysing car parking dwell times and shopper behaviour in order to improve our centres, for the purposes of managing car parking at the centre, marketing purposes and also to assist customers to locate their cars including via online and mobile applications.
- When customers use mobile applications developed by Clifford Gardens Shopping Centre or logon to Wi-Fi provided in-centre or third party applications utilising Clifford Gardens Shopping Centre's infrastructure (including Bluetooth beacon networks), customers provide Clifford Gardens Shopping Centre with certain information including their contact details. Clifford Gardens Shopping Centre collects this information to enable customers to be informed about upcoming events, activities and promotions, both in centre and as part of Clifford Gardens Shopping Centre's other activities, sponsor and retailer promotions, and other activities, which will be notified to customers as they sign in to use those facilities.
- When customers purchase, redeem or are provided with Clifford Gardens Shopping Centre's Gift Cards, they may provide Clifford Gardens Shopping Centre with their contact details. These details are used for card fulfilment purposes and, if customers opt in, to contact customers about events, activities and promotions, both in centre and as part of the Clifford Gardens Shopping Centre's other activities.

In addition to the purposes set out above, this information may be used by Clifford Gardens Shopping Centre in connection with the management and security of Clifford Gardens Shopping Centre generally, to obtain feedback about a customer's experiences at a centre (including with our retailers), and may be provided to law enforcement and government bodies, insurers, Clifford Gardens Shopping Centre staff and subcontractors, third parties who provide Clifford Gardens Shopping Centre with services from time to time and retailers for these purposes.

Where you provide information to us in different ways, or we hold information about you Clifford Gardens Shopping Centre may connect information provided to us for one purpose, with other information for use for one or more of the above purposes.

Additionally, Clifford Gardens Shopping Centre also conducts certain online activities through the Clifford Gardens Shopping Centre's websites, and associated sites managed by their subcontractors. The collection of personal information through these activities and information associated with these websites is dealt with in the Clifford Gardens Shopping Centre Online Privacy Policy, which can be found below.

Retailers

Privacy Policy - As at 14 March 2017

Clifford Gardens Shopping Centre may collect the following types of personal information from unincorporated retailers, guarantors and other individuals related to retailers during negotiations for, and during the term of, the lease/licence for premises, kiosks and other activations at Clifford Gardens Shopping Centre

- name, address and date of birth;
- contact and insurance details;
- ABNs;
- information as to retailers' financial standing and retailing experience; and
- other financial and trading information.

Clifford Gardens Shopping Centre requires this information to evaluate whether the relevant centre owner should enter into a lease, licence or other agreement with a retailer; to assist Clifford Gardens Shopping Centre in the preparation of that document; to manage Clifford Gardens Shopping Centre's relationship with retailers; in connection with the management and security of Clifford Gardens Shopping Centre and in order to monitor the performance of the shopping centre. Occasionally, the information may also be made available to others in connection with these activities, in order for those people to provide services to Clifford Gardens Shopping Centre or as required by law, as well as to third parties in connection with any transactions involving the ownership of the centre.

If the retailer provides Clifford Gardens Shopping Centre with direct debit or direct credit details, Clifford Gardens Shopping Centre will only disclose those details to Clifford Gardens Shopping Centre's bank to facilitate the provision of that service.

Additionally, as noted above, Clifford Gardens Shopping Centre is under video and camera surveillance. When entering Clifford Gardens Shopping Centre the personal information and images of retailers and their staff may be collected by Clifford Gardens Shopping Centre. This information may be used by Clifford Gardens Shopping Centre in connection with the management and security of the shopping centre and may be provided to law enforcement and government bodies, insurers, Clifford Gardens Shopping Centre staff and subcontractors, third parties who provide Clifford Gardens Shopping Centre with services from time to time and other retailers for those purposes. This information is held securely and in a format which is access controlled, unless it is necessary to use this information for these purposes.

Suppliers

If you, or a company you work for, supplies goods or services to Clifford Gardens Shopping Centre Clifford Gardens Shopping Centre may collect personal information about you in connection with the provision of those goods or services, either directly from you or from

Privacy Policy - As at 14 March 2017

that company. This information may include your name, date of birth, contact information, and any other information you provide, or provided on your behalf, as part of our induction and compliance processes. This information will be used for the purposes of managing the provision of those good or services.

Employees or potential employees

If you are employed by Clifford Gardens Shopping Centre or are seeking employment with Clifford Gardens Shopping Centre Clifford Gardens Shopping Centre may collect personal information about you in connection with your employment. This information may include your name, date of birth, contact information, and any other information you provide, or provided on your behalf, as part of our induction and compliance processes. This information will be used for the purposes of our recruitment process and, if successful, managing your employment, in accordance with the requirements of the Privacy Act 1988 (Cth) in Australia. You need to ensure this information is up to date, in accordance with Clifford Gardens Shopping Centre's policies and procedures.

Unsolicited Information

If we receive personal information about you that we did not ask for either directly from you, from someone on your behalf, or through someone on our behalf, and we determine that we could have collected this information from you had we asked for it, we will take reasonable steps to notify you, as soon as practicable, that we have collected your personal information. If we could not have collected this personal information from you (or if you do not agree to us collecting information in this way), we will lawfully de-identify or destroy that personal information. Any unsolicited information provided by you, someone on your behalf or someone on our behalf, will be used for the purposes for which it was provided.

Other information we collect

We may also collect the following information from you:

- where devices are enabled to connect to, or are identifiable by, in-centre infrastructure (for example, in-Centre WiFi networks or blue tooth transmitter (beacon) infrastructure), we and our third party providers may automatically collect data from those devices including usage, type of device and location and proximity of your wireless device in-Centre, centre arrival and departure time, and other data which users consent to us collecting from time to time;
- audience measurement information which may be collected passively using various technologies that identify the demographic, age group and gender of shoppers;
- the fully qualified domain name from which you accessed our websites, or alternatively, your IP address;
- device ID number (MAC address);
- the date and time you accessed each page on our websites;
- the URL of any webpage from which you accessed our websites or using in-Centre WiFi, and the details of any mobile Apps you have accessed from a device using in-Centre WiFi;

Privacy Policy - As at 14 March 2017

- publicly accessible social media posts and any personal information you allow us to collect by linking your account on our website with a third-party social-networking site including but not limited to Facebook, Twitter, or Google+;
- cookies which track your visits to the our web sites; and
- the web browser that you are using and the pages you accessed.

We are collecting this information (and may use or hold this information) for the following purposes:

- so that we can tell which web pages are the most popular and where shoppers spend most of their time;
- to improve our website or in-Centre experience;
- for the purposes of and incidental to your use of in-Centre Wi-Fi services (if applicable);
- to measure and analyse shopping behaviour in order to improve our centres and otherwise in connection with our business;
- to send to you special deals and discounts, surveys and other marketing materials based on your location or known web usage;
- for other purposes to which you, either expressly or impliedly, consent to, and for the purposes set out in these terms and conditions, we may provide this information to Clifford Gardens Shopping Centre's agents, contractors, service providers, joint venture and commercial partners and regulatory authorities, and may transfer your personal information to others in countries outside Australia (including to those that operate our cloud servers outside of Australia).

Clifford Gardens Shopping Centre may use the anonymised data for the purposes set out above and to inform our promotional and marketing strategies, as well as research and profiling purposes including customer demographics, interests and behaviours based on personal information and other information provided to us. This research may be compiled and analysed on an aggregate basis, and we may share this aggregate data with our affiliates, agents and business partners. This aggregate information does not identify you personally. We may also disclose aggregated information in order to describe our services to current and prospective business partners, and to other third parties for other lawful purposes.

Clifford Gardens Shopping Centre may connect information you provide to us for one purpose with other information for use for one or more of the above purposes. If you access or log-in to an in-Centre Wi-Fi service, and we already hold other information (both personal or non-personal) that can be associated to you or the device on which you are accessing the Wi-Fi service (including, but not limited to a device ID number (MAC address)), then that information may be linked with personal information we hold about you as set out

Privacy Policy - As at 14 March 2017

in this policy, and will be treated in the same manner as the personal information to which it has been linked.

Who collects the information

Personal information collected about individuals (as described above) may be collected by, or on behalf of:

- Clifford Gardens Shopping Centre and
- the owners of Clifford Gardens Shopping Centre in Australia.

Information may also be collected by Clifford Gardens Shopping Centre on behalf of other people as set out in notices given to individuals, or consents given by individuals, at or prior to the time the personal information is collected.

How your personal information is stored and kept secure

All personal information collected by Clifford Gardens Shopping Centre is held securely, whether on Clifford Gardens Shopping Centre's physical files, in Clifford Gardens Shopping Centre's computer systems or in a database (which may be hosted by Clifford Gardens Shopping Centre or a third party on Clifford Gardens Shopping Centre's behalf). This information is only made available to Clifford Gardens Shopping Centre staff on a 'need to know' basis and for the purposes outlined above or to other people as outlined in this policy who have agreed to treat that information confidentially. These databases are protected by a firewall as well as host-based security. Your personal information may be transmitted over the Internet once it has been stored in a database and may also be transferred across borders to recipients in foreign countries other than Australia, including the United States of America, Hong-Kong and the United Kingdom, and may be stored on servers, using databases or via cloud technology in a number of countries other than Australia, including regions such as the Americas, the European Union and Asia, where doing so is part of Clifford Gardens Shopping Centre's ordinary business practices relating to the storage of data and where permitted by law.

If Clifford Gardens Shopping Centre ever has a requirement to transmit such data over the Internet (for example, to make an off-site back up) it will be in encrypted form. By providing us with your personal information, you consent to these transfers.

We will use all reasonable endeavours to keep your personal information in a secure environment, however, this security cannot be guaranteed due to the nature of the Internet. These measures are designed to assist in your personal information not being accessed by unauthorised personnel, lost or misused. If you reasonably believe that there has been unauthorised use or disclosure of your personal information, please contact us (see below).

All reasonable steps are taken by us to ensure that your personal information held by us is accurate, complete and up to date. If you believe that any of your personal information is

Privacy Policy - As at 14 March 2017

inaccurate, please contact us (see below) and we will take all reasonable steps to correct it within a reasonable timeframe.

The electronic environments are monitored by Clifford Gardens Shopping Centre and third party specialist security monitoring companies. Clifford Gardens Shopping Centre reviews its security arrangements regularly, and implements improvements when necessary.

Disclosing your personal information

We understand how important it is to keep your personal information private, so we will disclose personal information we have about you only in certain specific circumstances, when:

- you agree to the disclosure; or
- we use it for the purposes we collected it; or
- disclosure is required or authorised by law.

To the extent permitted by law, we may also disclose information about you to:

- related companies for marketing purposes;
 - the owners of Clifford Gardens Shopping Centre from time to time;
 - third parties who provide services to Clifford Gardens Shopping Centre from time to time;
 - government agencies as part of our statutory obligations,
- or as otherwise permitted by law.

Right of access to and correction of your information

You have rights to access, update and correct your personal information held by us. We will take reasonable steps to ensure that personal information is up-to-date, accurate and complete.

If you wish to access, update or correct your personal information held by us, please contact our Privacy Officer, whose details appear below, or Clifford Gardens Shopping Centre's centre manager.

How long do we hold your information? We will keep your personal information for only as long as is necessary to achieve the purpose for which we collected it.

Clifford Gardens Shopping Centre's Online Privacy Policy

What information we collect and why

When you become a registered user of <http://www.cliffordgardens.com.au/> or any associated site (Site), including when you use services offered by a Site, subscribe to Clifford Gardens Shopping Centre's Email Newsletters service or part take in other activities with Participating Retailers, we may ask for information including:

- your name;

Privacy Policy - As at 14 March 2017

- your email address; and
- in certain circumstances, your telephone number, address or credit card details.

On the Site we invite you to:

- view products from Participating Retailers;
- set up a membership of the Site;
- subscribe to Clifford Gardens Shopping Centre's Email Newsletters;
- purchase Clifford Gardens Shopping Centre Gift Cards;
- submit your resume to us for consideration of job vacancies;
- tell us about your shopping experiences by completing a customer service survey; and
- tell us about any other matter by contacting us directly.

We collect this information in order to facilitate your access to the Site and the functionality provided by the Site. If you do not provide us with this information, we may not be able to provide you with access to all or part of the Site or functionality offered through the Site. In addition to the purposes set out above, this information may be used by Clifford Gardens Shopping Centre in connection with the management and security of the shopping centre and the operation of the Site generally, and may be provided to law enforcement and government bodies, insurers, Clifford Gardens Shopping Centre staff and subcontractors, third parties who provide Clifford Gardens Shopping Centre with services from time to time and retailers for these purposes. If you submit your resume to us, we will keep it in a database for consideration of particular jobs that arise within Clifford Gardens Shopping Centre. We also use this information to send to you special deals and discounts, surveys and other marketing materials based on your location or known web usage.

The Customer Service Survey that you complete will be used to help us improve our services at Clifford Gardens Shopping Centre or to improve our Site.

We update the information we hold about you, for example, your resume, when you provide or we receive new information about you. We may connect information, including personal information with other information for use for one or more of the above purposes.

Other information we collect

We may also collect the following information during your visit to the Site and to the websites of Participating Retailers:

- the fully qualified domain name from which you accessed our Site, or alternatively, your IP address;
- the date and time you accessed each page on our Site;
- the URL of any webpage from which you accessed our Site (the referrer);
- cookies which track your visits to the Site; and
- the web browser that you are using and the pages you accessed;

We use this information so that we can tell which pages are the most popular and where shoppers spend most of their time. We use this information to improve our site. We may connect information you provide to us for one purpose, with other information for use for

Privacy Policy - As at 14 March 2017

one or more of the above purposes. If this information is linked with personal information we hold about you as set out above, this information becomes personal information and will be treated in the same manner as the personal information to which it has been linked.

How your information is stored

Information held about you (for example, your E-mail Newsletter subscriptions) is held in a database. The database is protected by a firewall as well as host-based security. Your personal data may be transmitted over the Internet once it has been stored in the database and may also be transferred across borders to foreign countries, where doing so is part of Clifford Gardens Shopping Centre's business practices relating to the storage of data and where permitted by law. If Clifford Gardens Shopping Centre ever has a requirement to transmit the data over the Internet (for example, to transmit your purchase through a payment gateway or to make an off-site back up) it will be in encrypted form. If you provide us with additional information to verify your identity, we will destroy the copies of the documents you provide to us after we have successfully verified your identity.

How you can unsubscribe from the Email Newsletters service

You can choose to unsubscribe from our email newsletters by clicking the "unsubscribe" link at the bottom of any email newsletter you receive. There is no fee for this access.

Advertisers and Partners on Clifford Gardens Shopping Centre's Website(s)

Clifford Gardens Shopping Centre may allow advertising on its Site from time to time. Once you have clicked on an advertisement and have left the Site, our privacy policy no longer applies. You must read the privacy policy of the advertiser or subsequently visited site to see how your personal information will be handled on those sites. In addition, many business advertisements may be managed and placed on our Site by third-party companies. These "network advertisers" collect non-personal information when you click on or scan one of their banner advertisements. The information is collected using technology, so you may not realise it is being collected. The network advertisers collect this information so that they may show you ads that are more relevant or interesting to you.

On occasion the Site may also provide content that is created by a third-party partner website. In some instances the third-party sites will collect information in order to facilitate the transaction or to make the use of their content more productive and efficient. In these circumstances, the information collected is shared between Clifford Gardens Shopping Centre and our third-party sponsors.

Disclosing your information

We understand how important it is to keep your personal information private, so we will disclose personal information we have about you only in certain specific circumstances,

Privacy Policy - As at 14 March 2017

when:

- you agree to the disclosure;
- we use it for the purposes we collected it; or
- disclosure is required or authorised by law.

We may also disclose information about you to:

- related companies for marketing purposes;
 - the owners of Clifford Gardens Shopping Centre from time to time; Participating Retailers or their agents (such as financial institutions or our courier companies) from time to time;
 - third parties who provide services to Clifford Gardens Shopping Centre from time to time, including marketing, recruiting and survey services; and
 - law enforcement and government agencies as required from time to time.
- Junk mail or unsolicited email

You will only receive emails from Clifford Gardens Shopping Centre if:

- You subscribe to our Email Newsletters service. Our Email Newsletters will keep you informed of the latest offers, current promotions and specials at Clifford Gardens Shopping Centre. If you no longer wish to receive Email Newsletters, you may unsubscribe by clicking the “unsubscribe” link at the bottom of any email newsletter you receive;
- A friend nominates you to receive a page from the Clifford Gardens Shopping Centre Site. The email will be sent to you on behalf of your friend. You will not receive subsequent e-mails from us, because Clifford Gardens Shopping Centre will not record your e-mail address;
- You request information about our services when you choose to contact us. You will not be added to a mailing list of any kind and will only receive e-mail in the matter that you have contacted us about;
- You provide your details and request that we contact you when you send us your resume or when you complete our customer service survey; or
- They are otherwise relevant to the reasons for which we hold your email address, where we are permitted to do so by law.

What is a cookie and what are they used for?

A cookie is a text file placed into the memory of your computer by our computers. A copy of this text file is sent by your computer whenever it communicates with <http://www.cliffordgardens.com.au/>. Clifford Gardens Shopping Centre uses cookies to identify you between multiple visits, to better understand how <http://www.cliffordgardens.com.au/> is used, and to provide you information which may be of interest to you based on your previous visits to <http://www.cliffordgardens.com.au/> and to provide targeted advertising to you (including through ad servers and other third party advertisers) when you visit <http://www.cliffordgardens.com.au/> and certain other websites

Privacy Policy - As at 14 March 2017

where advertising is found from time to time. We may provide the information we gather from cookies to third parties for these purposes and for other purposes connected with <http://www.cliffordgardens.com.au/>. If cookie information is linked with personal information we hold about you as set out above, this cookie information becomes personal information and will be treated in the same manner as the personal information to which it has been linked. If you do not want ad servers or other third party advertisers to use cookies to provide you with targeted advertising, we suggest you use an opt out mechanism which can be found on:

- the Network Advertising Initiative opt-out provided; through <http://www.networkadvertising.org/choices/DAA>;
- the Digital Advertising Alliance opt-out provided; through <http://www.aboutads.info/choices/>; or
- the Interactive Advertising Bureau (EU) opt-out provided through <http://www.youronlinechoices.eu>.

You do not have to accept cookies and you can set up your browser to notify you when you receive cookies. This will give you the opportunity to decide whether or not to accept the cookies. If you choose to disable cookies, you may not be able to access certain features of the website.

General

Tips on sending us information

While we do all we can to guard your privacy, no data transfer over the Internet is 100% secure. When you share your information with us, it is at your own risk. There are ways you can help maintain the secrecy of your information:

- always close your browser when you have finished your user session; and
- ensure others cannot access your personal information and emails if you use a public computer.

If something goes wrong.

Please contact us by email or by phone, if you believe:

- someone has gained access to your personal information by mistake;
- we have breached our privacy obligations or your privacy rights in any way; or
- you would like to discuss any issues about our privacy policy.

We will try to satisfy any privacy questions that you have and correct any errors on our part. If you still have concerns please contact our Privacy Officer by email to info@cliffordgardens.com.au, or phoning 07 4634 1371.

Changes to our privacy policy

This privacy policy relates to our current privacy standards. We may vary our privacy policy from time to time. We will notify you of any changes by publishing the latest policy from

Privacy Policy - As at 14 March 2017

time to time at <http://www.cliffordgardens.com.au/privacy-policy>.

Further information regarding Privacy Legislation

If you would like further information relating to the Australian Privacy Legislation and the Australian Privacy Principles, please visit www.privacy.gov.au

Clifford Gardens Shopping Centre Contact Details

Please contact Clifford Gardens Shopping Centre's Privacy Officer or Clifford Gardens Shopping Centre's centre manager if you believe:

- someone has gained access to your personal information by mistake;
- we have breached our privacy obligations or your privacy rights in any way; or
- you would like to discuss any issues about our privacy policy.

You can contact Clifford Gardens Shopping Centre's Privacy Officer by:

Phone: 07 4634 1371

Email: info@cliffordgardens.com.au

Post: Privacy Officer, Clifford Gardens Shopping Centre PO Box 18090, Clifford Gardens, Toowoomba, QLD, 4350