

## PRIVACY STATEMENT

### WINDSOR DEVELOPMENT HOLDINGS PTY LTD A.B.N. 73 123 380 076

#### Introduction

1. This Privacy Statement is given by Windsor Development Holdings Pty Ltd A.B.N. 73 123 380 076 and all entities associated with or related to it ("**Nifsan Group**").
2. The Nifsan Group is subject to the National Privacy Principles under the *Privacy Act 1988*.
3. This Privacy Statement has been prepared in compliance with National Privacy Principle 1.3 and explains in general terms how the Nifsan Group protects the privacy of your personal information under the *Privacy Act 1988*.
4. This Privacy Statement will apply to any personal information about you (as defined in the *Privacy Act 1988*) which you or a third party provide to the Nifsan Group when dealing with the Nifsan Group.

#### Windsor Development Holdings Pty Ltd Contact and Access to Information

5. You are able to gain access to personal information about you collected by the Nifsan Group by contacting the specified below:
  - (a) By Post: Windsor Development Holding Pty Ltd  
Po Box 2285  
Nerang East Qld 4211
  - (b) By Telephone: (07) 55106110
  - (c) By Facsimile: (07) 55945838
  - (d) By Email: mail@emerald lakes.com.au
6. The Nifsan Group will provide you with access to the personal information it holds about you unless there is an exception which applies under the National Privacy Principles.
7. The Nifsan Group may recover from you its reasonable costs of supplying you with access to this information.
8. Your request to provide access to this information will be dealt with within a reasonable time.
9. If the Nifsan Group refuses to provide you with access to personal information about you, the Nifsan Group will provide you with reasons for the refusal and inform you of any exceptions relied upon under the National Privacy Principles.

#### Purpose of Collection

10. The Nifsan Group offers a range of services including:
  - (a) golf club operations and golfing activities; and
  - (b) functions and event management("Services").
11. The Nifsan Group will collect personal information about you for the purpose of enabling the Nifsan Group to provide the relevant Services to you and to give effect to any agreement in relation to those Services.

12. The Nifsan Group may collect personal information about you when you:
  - (a) enter into or propose to enter into any agreement with the Nifsan Group for the Services; and/or
  - (b) deal with or correspond with the Nifsan Group or any person under its control by any means.
13. As well as collecting information directly from you, there may be occasions when the Nifsan Group collects information about you from a third party. However, whenever practicable and reasonable, the Nifsan Group will only collect personal information about you directly from you.
14. If you disclose personal information to the Nifsan Group about another person, then you promise Nifsan Group that:
  - (a) you will at all times comply with the *Privacy Act 1988* in relation to the personal information of the third party;
  - (b) the third party has consented to Nifsan Group collecting, using and disclosing that personal information as contemplated in this Privacy Statement;
  - (c) the third party agrees to be bound by this Privacy Statement; and
  - (d) the Nifsan Group will not be responsible or liable in any way for any harm or loss to the third party if you do not comply with any of the above promises.

#### **Disclosure of Information to Third Parties**

15. Subject to paragraphs 16 and 17, the Nifsan Group may disclose personal information about you to any or all of the following entities:
  - (a) any member of the Nifsan Group;
  - (b) any relevant departments, authorities or agencies; and/or
  - (c) any advisors, consultants, agents, contractors, employees or other persons authorised by or under the control of any of the above entities.
16. The Nifsan Group will only disclose personal information about you to the entities specified in paragraph 15 if disclosure to those entities is necessary to allow provision of the relevant Services to you and any related agreement as contemplated by paragraph 10.
17. However in addition to the above the Nifsan Group may also disclose personal information about you to others for the purposes of:
  - (a) providing you with advertising material relating to products and services of the Nifsan Group; and/or
  - (b) compiling statistics to be used by the Nifsan Group.
18. The Nifsan Group may also be required to collect personal information about you in order to comply with relevant laws.

#### **Maintaining Your Personal Information**

19. The Nifsan Group will take reasonable steps to ensure that your personal information is accurate, complete and current.
20. You may contact the Nifsan Group to request that personal information about you be corrected to ensure that it is accurate, complete and current.

#### **Security and Anonymity**

21. The Nifsan Group will use reasonable endeavours to ensure that your personal information is secure against unauthorised access.
22. If you request to do so, you may deal with the Nifsan Group anonymously provided that it is lawful and practicable to do so.

## **Privacy Policy**

23. The Nifsan Group has a Privacy Policy which deals with management of your personal information.
24. You can access this Privacy Policy by contacting the Nifsan Group as specified above.

## **Further Concerns**

25. If you wish to gain access to your personal information, have a complaint about a breach of your privacy or you have any query on how your personal information is collected or used please contact the Nifsan Group as specified above.

## **Changes to this Privacy Statement**

26. The Nifsan Group may make changes to this privacy statement without notice.

## **Your Consent**

27. Without collecting, using and disclosing the above personal information about you, the Nifsan Group may not be able to provide the relevant Services to you or proceed with any related agreement.
28. Therefore, unless you advise the Nifsan Group otherwise, you:
  - (a) consent to the Nifsan Group collecting, using and disclosing personal information about you as specified above; and
  - (b) agree to be bound by this Privacy Statement.