EMERALD LAKES
— GOLF CLUB —
EST. 1989

PRIVACY STATEMENT

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

Introduction

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 ("**TO Land Holdings Company Group")**

The **TO Land Holdings Company Group** is subject to the Australian Privacy Principles under the *Privacy Act 1988*.

This Privacy Statement has been prepared in compliance with National Privacy Principle schedule 1 as at 12th March 2014 and explains in general terms how the **TO Land Holdings Company Group** protects the privacy of your personal information under the *Privacy Act 1988*.

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 **TO Land Holdings Company Group** when dealing with the **TO Land Holdings Company Group**.

Windsor Development Holdings Pty Ltd Contact and Access to Information

You are able to gain access to personal information about you collected by the **TO Land Holdings Company Group** by contacting the Windsor Development Holdings Pty Ltd as specified below:

(a)	Post:	Windsor Development Holdings Pty Ltd PO Box 2285 Nerang, Queensland, 4211
(b)	Telephone:	(07) 5594 4400
(c)	Email:	mail@emeraldlakes.com.au

The **TO Land Holdings Company Group** will provide you with access to the personal information it holds about you unless there is an exception which applies under the Australian Privacy Principles.

The **TO Land Holdings Company Group** may recover from you its reasonable costs of supplying you with access to this information.

Your request to provide access to this information will be dealt with within a reasonable time.

If the **TO Land Holdings Company Group** refuses to provide you with access to personal information about you, the **TO Land Holdings Company Group** will provide you with reasons for the refusal and inform you of any exceptions relied upon under the Australian Privacy Principles

Purpose of Collection

The **TO Land Holdings Company Group** offers a range of services including:

(d) golf club operations and golfing activities; and

(e) functions and event management

Services

The **TO Land Holdings Company Group** will collect personal information about you for the purpose of enabling the **TO Land Holdings Company Group** to provide the relevant Services to you and to give effect to any agreement in relation to those Services.

The **TO Land Holdings Company Group** may collect personal information about you when you:

(f) enter into or propose to enter into any agreement with the **TO Land Holdings Company Group** for the Services; and/or

(g) deal with or correspond with the **TO Land Holdings Company Group** or any person under its control by any means.

As well as collecting information directly from you, there may be occasions when the **TO Land Holdings Company Group** collects information about you from a third party. However, whenever practicable and reasonable, the **TO Land Holdings Company Group** will only collect personal information about you directly from you.

If you disclose personal information to the **TO Land Holdings Company Group** about another person, then you promise **TO Land Holdings Company Group** that:

(h) you will at all times comply with the *Privacy Act 1988* in relation to the personal information of the third party;

(i) the third party has consented to **TO Land Holdings Company Group** collecting, using and disclosing that personal information as contemplated in this Privacy Statement;

(j) the third party agrees to be bound by this Privacy Statement; and

(k) the **TO Land Holdings Company Group** will not be responsible or liable in any way for any harm of loss to the third party if you do not comply with any of the above promises.

Disclosure of Information to Third Parties

Subject to paragraphs 16 and 17, the **TO Land Holdings Company Group** may disclose personal information about you to any or all of the following entities:

(l) any member of the **TO Land Holdings Company Group**;

(m) any relevant departments, authorities or agencies; and/or

(n) any advisors, consultants, agents, contractors, employees or other persons authorised by or under the control of any of the above entities.

The **TO Land Holdings Company 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.

However in addition to the above the **TO Land Holdings Company Group** may also disclose personal information about you to others for the purposes of:

(o) providing you with advertising material relating to products and services of the **TO Land Holdings Company Group**; and/or

(p) compiling statistics to be used by the **TO Land Holdings Company Group**

The **TO Land Holdings Company Group** may also be required to collect personal information about you in order to comply with relevant laws.

Maintaining Your Personal Information

The **TO Land Holdings Company Group** will take reasonable steps to ensure that your personal information is accurate, complete and current.

You may contact the **TO Land Holdings Company Group** to request that personal information about you be corrected to ensure that it is accurate, complete and current.

Security and Anonymity

The **TO Land Holdings Company Group** will use reasonable endeavours to ensure that your personal information is secure against unauthorised access.

We are committed to protecting your privacy and will take reasonable steps to keep personal information protected from loss and misuse and unauthorised access, modification and disclosure. We use a variety of physical and electronic security measures including restricting physical access to our offices, firewalls, anti-virus, password policies, routers, network and host intrusion detection systems, appropriate encryption and secure databases. We will take reasonable steps to destroy or permanently de-identify personal information if it is no longer needed for any purpose.

If you request to do so, you may deal with the **TO Land Holdings Company Group** anonymously provided that it is lawful and practicable to do so.

Privacy Policy

The **TO Land Holdings Company Group** has a Privacy Policy which deals with management of your personal information.

You can access this Privacy Policy by contacting the **TO Land Holdings Company Group** as specified above.

Further Concerns

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 **TO Land Holdings Company Group** as specified above.

Changes to this Privacy Statement

The **TO Land Holdings Company Group** may make changes to this privacy statement without notice.

Your Consent

Without collecting, using and disclosing the above personal information about you, the **TO Land Holdings Company Group** may not be able to provide the relevant Services to you or proceed with any related agreement.

Therefore, unless you advise the **TO Land Holdings Company Group** otherwise, you:

(q) consent to the **TO Land Holdings Company Group** collecting, using and disclosing personal information about you as specified above;

(r) and agree to be bound by this Privacy Statement.