

SYDNEY METRO AIRPORTS PRIVACY POLICY

This Privacy Policy was last updated on 28 June 2018.

1. Our privacy commitment

This Privacy Policy applies to the collection, use, disclosure and handling of personal information by BAC Airports Pty Limited ACN 105 905 655, BAC Holdco Pty Limited ACN105 905 628, Bankstown Airport Limited 083 058 637, and Camden Airport Limited ACN 083 056 464 and their related bodies corporate (collectively "we" or "us"), including personal information collected via our websites. It explains the way in which we handle personal information (including credit-related personal information) collected in connection with the provision of goods and services at Essendon Airport and Essendon Fields.

We are committed to protecting the privacy of individuals and are bound by the Australian Privacy Principles set out in the Privacy Act 1988 (Cwth) ("Act") and the Privacy (Credit Reporting) Code 2014 (version 1.2) ("Code"). We will only collect, use or disclose personal information, including credit-related personal information, in accordance with the Act, the Code and this Privacy Policy.

2. What personal information we collect

We collect personal information including credit-related personal information and sensitive personal information about you in the course of our dealings with you.

Personal information

Personal information is any information or opinion about an individual who is reasonably identifiable. We collect and hold personal information about our customers, tenants, contractors, agents and other third parties.

We may collect and hold the following types of personal information from you:

- contact information such as name, address, email address, phone number and fax number (including where you have provided these details in entering into one of our competitions or promotions);
- car registration number if you use our car parking areas;
- closed circuit television ("CCTV") footage of you when you visit Essendon Airport and Essendon Fields;
- evidence of your identity such as a driver's licence, passport or birth certificate if you are seeking authority to access Airside areas;
- if you are a prospective or current tenant or a guarantor, information about previous property transactions and dealings you have had with us;
- records of communications between us (whether through our help desk, in person, through our websites, via social media or otherwise), including information from enquiries you have made;
- payment information which may include bank account or credit card details, and other information that we need in order to provide relevant goods and services to you;
- education and employment history if you are seeking employment with us; and
- publicly available information that is relevant for our business purposes such as ASIC searches.

Credit-related personal information

In some instances, we may collect credit-related personal information about our aviation customers, our tenants (including aviation, commercial and retail tenants) and individuals who provide credit guarantees for our tenants. In particular, credit-related personal information may be collected in order to assess your eligibility for a credit account for our goods and services, such as for re-fuelling, landing charges

credit account for our goods and services, such as for refuelling, landing charges and aircraft parking services.

Credit-related personal information includes credit information (which is personal information related to credit that you have applied for, or which has been provided to you such as your contact details, credit account information and any default and payment information) and credit eligibility information (which includes credit information, any information disclosed to us by a credit reporting body, and information that we derived about you through our own analysis of information provided to us by a credit reporting body).

The kinds of credit information and credit eligibility information we collect and hold about you may include:

- your identification information, such as name, date of birth, addresses and contact details;
- information about your financial circumstances, such as your employment, income, expenses and savings as may be relevant for any credit decision;
- details about your credit worthiness, for example, other credit you might have applied for, details relating to court proceedings or publicly available information from the National Personal Insolvency Index; and
- information about your repayment history, and whether you have had any overdue payments or defaults.

Sensitive personal information

We may also collect sensitive personal information from you, if you provide contractual services to us or if you apply for employment with us, such as your criminal record and test results under our drug and alcohol management plan. Unless permitted by law, sensitive information would only be collected with your consent. We do not usually collect sensitive information in connection with credit applications or tenancy applications.

We are required to collect some information by laws including the Airports Act 1996 (Cth) and the Civil Aviation Act 1988 (Cth).

3. How we collect your personal information

Generally, we will only obtain personal information or credit-related personal information directly from you or in the course of our dealings with you, for example:

- when you provide personal information to us;
- through CCTV footage when you visit Essendon Airport or Essendon Fields;
- when entering into commercial or other transactions and arrangements with you, including service agreements and lease agreements;
- when you provide your information to us through our websites or services;
- when you contact and correspond with us, for example to ask for information or provide other feedback to us; and
- when you seek employment with us.

We may also collect personal information from third parties such as law enforcement agencies and other government entities but only in accordance with the Act. If you have applied for credit with us (and in some instances, only where you have provided consent) we may also collect credit-related personal information about you from credit reporting bodies.

If we are not able to collect your personal information (including, in some instances, credit-related personal information), we may not be able to provide you with our products and services or do business with you or the organisation with which you are connected. You are not able to visit Essendon Airport or Essendon Fields without CCTV images of you being collected.

Cookies

We use Google Analytics for website traffic and data reporting to measure how users interact with our website. As a user navigates between web pages, Google Analytics

provides website owners JavaScript tags (libraries) to record information about the page a user has seen, for example the URL of the page. The Google Analytics JavaScript libraries use [HTTP Cookies](#) to "remember" what a user has done on previous pages / a user's interactions with the website, but does not collect any personal information about the website user. You can opt out of the collection of this information by disabling cookies through your web browser, however you may not be able to use all our website features if you do so.

4. The purposes for which we collect your personal information

We collect, hold and use personal information for a variety of reasons including to:

- provide services and products to our customers;
- manage our relationships with our tenants, suppliers and stakeholders;
- answer your inquiries and deliver customer service;
- tell our customers and prospective customers about other products, services or promotional offers that we think may be of interest to them;
- carry out competitions and promotions;
- maintain and improve our customer service;
- meet our regulatory and legal obligations;
- manage and resolve any legal or commercial complaints and issues;
- carry out internal functions including training;
- conduct marketing research and analysis; and
- assess your application for employment with us.

We collect, hold and use credit-related information to:

- make internal assessments about your credit and eligibility for a product, service, lease or use of our aviation facilities;
- assess whether to accept an individual as a guarantor for a prospective or current tenant;
- manage your credit account, including to provide you with notice to avoid defaulting on your obligations; and
- collect any overdue payments.

We may also use your information for other purposes required or authorised by or under law, including purposes for which you have provided your consent.

5. In what circumstances will we disclose your personal information?

In the course of conducting our business and providing our products and services to you, we may disclose your personal information. In particular, your personal information (including your credit-related personal information) may be shared between our businesses for the purposes outlined in this policy.

We may also disclose your personal information or your credit-related personal information (if you have provided your consent or where permitted by law) to, where appropriate:

- professional advisers (such as lawyers or auditors);
- our contracted service providers, including:
 - information technology service providers;
 - payment systems operators and financial institutions;
 - debt collection agencies, if we have provided credit to you;
- organisations authorised by us to conduct promotional, research or marketing activities;
- your referee, if you have applied to work for us as an employee or contractor;
- potential guarantors;
- a person or organisation proposing to purchase the whole or part of our business;
- law enforcement agencies or government authorities; and
- any persons acting on your behalf including those persons expressly nominated by

you.

We may disclose your personal information to third parties for other purposes required or authorised by or under law, including purposes for which you have provided your consent. In all circumstances where your personal information is disclosed, we will take all steps reasonable to ensure that these third parties undertake to protect your privacy, whether contractually or otherwise.

We will not sell, transfer or otherwise provide your personal information to any other party other than in accordance with the Act. We do not, in the usual course of our business, store, process or otherwise disclose personal information outside Australia.

6. Direct marketing

We will use your personal information only for the purposes of our normal business dealings and in accordance with the Australian Privacy Principles. This may include adding you to one of our mailing lists, whether for hard copy or electronic mail, to keep you informed of our business developments. Each marketing communication from us will include information about how you may unsubscribe from our mailing lists. If you advise us that you do not want marketing material, we will carry out your request within 30 days after your request is made. We do not use your credit eligibility information for the purposes of direct marketing.

7. Access to information

You have a right to request access to and seek correction of your personal information (including credit information or credit eligibility information) held by us. If you wish to access, correct or update any such information, please contact our Privacy Officer as set out in 12. Contact information below. We will respond to your request within 30 days.

We may refuse access to the information where the Act or Code allows us to do so, such as where granting access to the information may jeopardise the privacy of another individual. Where access is granted we may charge a reasonable fee to cover the costs of providing access to you, such as where it takes a significant amount of time to locate the information.

We rely on the personal information we hold in conducting our business. Therefore, it is very important that the information we hold is accurate, complete and up to date. If you believe that your personal information (including credit information or credit eligibility information) is inaccurate, incomplete, out of date, or irrelevant or misleading, please contact our Privacy Officer using the details provided below and we will take reasonable steps to correct that information.

8. Credit reporting bodies

In certain circumstances, such as where you have applied for a credit account with us to become a tenant, we may collect credit information from a credit reporting body for the purposes stated in this Privacy Policy. Except as necessary to obtain a credit report, we do not disclose your information to credit reporting bodies. The credit reporting body we deal with is Dun & Bradstreet (<http://dnb.com.au/>).

You can contact the credit reporting body directly to obtain access to your credit information, to request that the credit reporting body not use your credit information for pre-screening in relation to direct marketing, and to ask it not to disclose your credit information to anyone if you think there is a risk of fraud or identity theft.

9. Storage and security of your personal information

We may hold your personal information (including credit-related information) in either electronic or hard copy form. We use safeguards such as controlled premises, secured electronic databases and internet firewalls to ensure your personal information is protected from misuse or loss, or from unauthorised access, modification or disclosure.

If we no longer require your personal information for any purpose detailed in this Privacy Policy and we are not legally required to retain that personal information then

Privacy Policy and we are not legally required to retain that personal information then we will take all reasonable steps to either destroy or de-identify the personal information.

10. Changes to this Privacy Policy

This Privacy Policy may be amended from time to time. The current version is posted ef.com.au.

11. Complaints

If you have any questions or concerns about our privacy practices under the Privacy Act or the Code, please contact our Privacy Officer as set out below. We take all issues and concerns raised about our privacy practices very seriously and will respond to all complaints within 30 days. Please note, however that if we require further information for investigation purposes, we may take longer than 30 days to respond to your complaint.

If you consider your privacy concerns have not been resolved satisfactorily by us or you wish to obtain further information on privacy requirements, you may contact the Office of the Australian Information Commissioner on 1300 363 992 or visit their website at www.oaic.gov.au.

12. Contact information

If you would like any further details about our Privacy Policy or would like us to send you a copy of this policy, please contact our Legal Department as follows:

Legal Department
Sydney Metro Airports
PO Box 640
Wetherill Park New South Wales 1851
Australia

Phone: (02) 8709 9400
Email: info@bankstownairport.com.au

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