SENSE - PRIVACY POLICY

OUR COMMITMENT TO PROTECTING YOUR PRIVACY

This privacy policy ('**Privacy Policy**') applies to the collection, storage, use and disclosure of personal information by or on behalf of Sense Retirement Living Pty Ltd ACN 678 777 832 and the TP Dynamics Group, and their respective employees and other representatives (all of which are collectively referred to in this Privacy Policy as '**Sense**', '**we**', '**our**', and '**us**').

Sense is committed to protecting your personal information and ensuring its privacy, accuracy and security. We handle your personal information in a responsible manner in accordance with the Privacy Act 1988 (Cth) (**'the Act'**) and the Australian Privacy Principles ('**APPs**').

By using any of our products or services; visiting our display suites, property or website or other websites associated with the TP Dynamics Group; or giving us your personal information, you agree to your information being collected, stored, used and disclosed as set out in this Privacy Policy.

WHAT IS PERSONAL INFORMATION?

When we refer to "personal information", we mean information from which your identity is reasonably apparent. This information may include information or an opinion about you, whether truthful or otherwise. The personal information we hold about you may also include credit-related information.

WHAT IS SENSATIVE INFORMATION?

Sensitive information (a type of personal information) has the same meaning as in the Act. In summary, it means information or an opinion about an individual's race or ethnic origins, political opinions and associations, religious beliefs or affiliations, philosophical beliefs, sexual preferences or practices, trade or professional associations and memberships, union membership, criminal record, health or genetic information, or biometric information.

WHOSE PERSONAL INFORMATION DO WE COLLECT?

Wherever reasonable and practicable, we collect personal information from the individual to whom the information relates. We generally collect information from people seeking our products and services. If you provide personal information about someone other than yourself, you agree that you have that person's consent to provide the information for the purposes for which you provide it to us. You also agree that you have told the person about this Privacy Policy and where to find it.

CAN I REMAIN ANONYMOUS OR USE A PSEUDENYM?

Generally, it is not possible for you to remain anonymous or adopt a pseudonym for us to interact with you effectively or to conduct any business with you.

WHAT PERSONAL INFORMATION DO WE COLLECT?

The types of personal information we collect will depend on your relationship with us, what services you use or what products you acquire. The information we collect includes:

a. your full name, gender, date and place of birth, country of residence and nationality, contact details (address, email and phone) occupation;

b. current and prior businesses, industries, occupations, company affiliations, roles, titles, biography, education and unincorporated businesses, directorship details, including director ID numbers and any disqualification;

c. your family and other relationships;

d. photo ID and unique identifier such as a passport, national ID or driver's licence number, relevant expiry dates and class where applicable, and other information identifiable from scanned ID documents such as photographs and organ donor status;

e. information obtained from sanctions' lists, politically exposed persons' lists, monitoring services, screening services, fraud-prevention services and document verification services;

f. services and transactions obtained, offered and supplied including usage history, including information about the time, place, and circumstances of our interactions with you;

g. credit card information and/or payment details, information regarding source of wealth, source of funds and the nature and purpose of the business relationship or transaction, as applicable;

h. other information about you available in public records or that you provide to us or our third-party service providers;

i. communication records (emails, calls, texts, notes of conversations); and

j. video and photographs of you when you attend properties, display suites or events owned, operated or arranged by us.

We will only collect your sensitive information:

a. if you have consented to us doing so – for example, sensitive information supplied by our customers so that we can cater for specific needs in relation to our products and services; or

b. where required or permitted by law.

WHY DO WE COLLECT PERSONAL INFORMATION?

We collect personal information for the following purposes (not all of which may be applicable to you):

a. to provide you with products and services that you have requested from us;

b. for marketing purposes and to provide you with information about our services, which may be of interest to you;

c. to improve the products and services that we offer or are intending to provide;

d. to enable us to conduct our business, including processing payments, managing any credit we have provided to you and meeting our legal and regulatory obligations; and

e. to enable us to comply with Anti Money Laundering & Counter Terrorism Finance (AML/CTF) obligations under the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (AML/CTF Act)

If you do not provide your personal information, we may not be able to provide you with the requested products or service, employ you or otherwise deal with you.

HOW DO WE COLLECT PERSONAL INFORMATION?

We collect personal information by fair and lawful means. We may collect your personal information from a range of sources, including:

a. directly from you, such as if you visit or telephone us, email us, write to us, provide your business card, meet with us, attend an event organised by or on behalf of us or attend an interview with us or contact us via our website;

b. if you click to register your interest on our website, or through a third-party website;

c. if you upload content directly to our social media profiles;

d. if you otherwise request or obtain a product or service from us;

e. if you provide a product or service to us, our representatives or employees; and

f. if you apply for employment with us, including directly or via recruitment agencies.

HOW DO WE USE YOUR PERSONAL INFORMATION?

We only use your personal information for the purpose of which the personal information was provided to us, for related purposes, or as required or permitted by law.

Such purposes may include:

a. in the ordinary course of conducting our business, including responding to your enquiries and feedback, supplying or acquiring our products or services, providing information about our products, services, events, news, and publications that may be of interest to you;

b. market and product research for the purposes of product and service development, so that we are able to better understand our customers' needs and develop our future products and services accordingly;

c. performing general administration, reporting and management functions;

d. performing invoicing and account management, payment processing, credit and risk management, quality assurance and managing suppliers;

e. as part of a sale (or proposed sale) of property;

f. video and photographic material may be used for marketing purposes; and

g. other purposes related to or in connection with our business, including meeting our legal and contractual obligations to third parties and for internal corporate governance purposes.

HOW DO WE DISCLOSE PERSONAL INFORMATION?

We may disclose, and you consent to us disclosing, your personal information to third parties, including those third parties that are:

a. engaged by us to provide products or services, or to undertake functions or activities on our behalf (for example, organisations that assist in processing payment information, provision of finance, debt recovery, managing databases including our use of a web-based customer relationship management system, marketing, research and advertising);

b. authorised by you to receive personal information that we hold;

c. our related bodies corporate, business partners, joint venturers, partners or agents;

d. a party to or an adviser of a sale (or proposed sale) of all or part of our business, including external advisers, to potential and actual bidders and their external advisers;

e. reasonably required to receive personal information for the purposes of advising us and our employees, agents and representatives in a legal capacity, such as where we require and obtain advice, prepare legal proceedings or investigate suspected unlawful activity or serious misconduct; or

f. as required or permitted by law.

We may disclose your personal information to:

a. third parties to assist us and our related entities with Anti Money Laundering & Counter Terrorism Finance (AML/CTF) obligations under the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (AML/CTF Act) including screening, identity verification and storage; and

b. AUSTRAC or another entity in our AML/CTF reporting group (this is a group made of companies and entities within the TP Dynamics group) to meet our legal and regulatory obligations under the AML/CTF Act and the rules or regulations made under it.

We may disclose, and you consent to us disclosing, your personal information to any of our related bodies corporate whether located in Australia or overseas. If we disclose your personal information to an associated entity or related body corporate, your information will be collected, stored, used and disclosed in accordance with this Privacy Policy, the APPs and the Act.

HOW DO WE USE AND DISCLOSE SENSITIVE INFORMATION?

We will only use or disclose sensitive information:

(a) for the purpose for which it was initially collected or for a directly related purpose, as required or permitted by law, or where you have consented to the use or disclosure of sensitive information; or

(b) if you require medical treatment whilst attending our facilities or using our services, we may disclose sensitive information to health professionals and first responders treating you.

HOW DO WE USE AND DISCLOSE PERSONAL INFORMATION FOR DIRECT MARKETING?

We may use or disclose your personal information (other than sensitive information) to provide you with information about our products or services that we consider may be of interest to you. You may choose to unsubscribe, or otherwise 'opt out', at any time, if you do not wish to receive marketing communications or promotional material from us. Once you have unsubscribed from receiving marketing communications or promotional material, no further communications or material will be sent to you.

You may unsubscribe by:

a. contacting us via email or in writing to the address below and requesting that you no longer wish to receive marketing communications or promotional materials; or

b. where applicable, clicking the 'unsubscribe' button.

DO WE DISCLOSE PERSONAL INFORMATION OVERSEAS?

We may disclose your personal information to overseas recipients, for example, where information is stored in a cloud server, or where you access our products or services through a third-party site. We will not send your personal information overseas without obtaining your consent (this may be implied) or otherwise in compliance with the APPs and the Act.

DO WE ADOPT, USE OR DISCLOSE GOVERNMENT IDENTIFIERS?

We do not adopt, use or disclose government related identifiers except as required or permitted by law.

HOW DO WE ENSURE THE QUALITY OF DATA?

We take all reasonable steps to ensure that your personal information is accurate, complete, and up to date. We use our best endeavours to update customer information that we store. However, we rely on you to advise us of any changes or corrections to the information that we hold about you. If you consider that the information, we hold about you is not accurate, complete, or up-to-date, or if your information has changed, please contact us as soon as possible and advise us accordingly.

HOW IS PERSONAL INFORMATION KEPT SECURE?

We respect the confidentiality of personal information and sensitive information, and ultimately, the privacy of individuals. We take reasonable steps to protect your

personal and sensitive information from misuse, interference, loss and unauthorised access, modification, and disclosure.

Such steps include:

a. physical security over paper-based and electronic data storage and premises;

b. computer and network security measures, including the use of firewalls, password access, secure servers, encryption, automatic screen savers and employee policies about IT security;

c. secure destruction of physical copies of personal information;

d. restricting access to your personal information to employees and those acting on our behalf who are authorised and on a 'need to know' basis, including limiting access to credit card details following the provision of products and/or services;

e. policies about privacy of your personal information and our employees' access to and use of such personal information;

f. retaining your personal information for no longer than is reasonably required, unless we are required by law to retain it for longer; and

g. entering into confidentiality agreements with third parties, where necessary.

ACCESSING YOUR PERSONAL INFORMATION

You may request to access the personal information that we hold about you by contacting us. Our contact details are listed in this Privacy Policy. We will respond to your request within a reasonable amount of time and will provide you with the personal information that we hold about you unless otherwise permitted or required by law. If we deny you access to the personal information, we will notify you of the basis for the denial unless an exception applies.

Where reasonable and practicable, we will provide access to the personal information we hold about you in the manner you request. There are no fees that apply for requesting access to information we hold about you.

CORRECTING YOUR PERSONAL INFORMATION

If you believe that the personal information that we hold about you is inaccurate, incomplete, or not current, you may request that we update or correct the information by contacting us via email.

We will deal with any requests for the update or correction of information within a reasonable amount of time. However, if we consider that the updated or corrected information is inaccurate (for example, where we believe that the information is already accurate, up to date, complete, relevant, and not misleading), we are not required to make the requested update or correction.

Where we refuse to update or correct information, we will provide you with written notice setting out the reasons.

FURTHER INFORMATION

You may request further information about the way we manage your information by contacting us.

OUR CONTACT DETAILS AND PROVIDING FEEDBACK

If you are not satisfied with how we have managed or used your personal information, have any questions about this Privacy Policy or further queries (including in relation to updating or correcting your personal information), you may contact us using the details listed below.

Sense Retirement Living Pty Ltd ACN 678 777 832:

Level 1, 64 Northbourne Avenue, Canberra City, 2601

Phone: 02 6154 8900

Email: admin@tpdynamics.com.au

Website: https://senseyowani.com.au and https://tpdynamics.com.au

If you are dissatisfied with the response from us, you may submit a complaint to the Office of the Australian Information Commissioner, which can be contacted on either www.oaic.gov.au or 1300 363 992.

THE TP DYNAMICS GROUP

The TP Dynamics Group includes: TP Dynamics Pty Ltd ACN 150 644 723; TP Dynamics (ACT) Pty Ltd ACN 664 089 641; Denman 3 Pty Ltd ACN 628 084 435; DynamiQ Fitness Pty Ltd ACN 688 014 753; Newlyne Nominee Pty Ltd ACN 674 475 248; Sense Retirement Living Pty Ltd ACN 678 777 832; TP Giralang Pty Ltd ACN 660 381 948; and associated entities.