

Group Privacy Policy and members of the Group

Bright & Duggan Group Pty Ltd (referred to as 'Bright & Duggan', 'we' or 'us') includes Bright & Duggan ABN 88 000 014 675 and its subsidiaries.

This Privacy Policy applies to all Bright & Duggan businesses unless that business has adopted a separate policy. This means that this Privacy Policy applies to:

- a. Bright & Duggan Property Group Pty Ltd
- b. Bright & Duggan Facilities Management Pty Ltd
- c. Bright & Duggan Property Services Pty Ltd
- d. Bright & Duggan Pty Ltd
- e. Bright & Duggan (ACT) Pty Ltd
- f. Bright & Duggan (QLD) Pty Ltd
- g. Bright & Duggan (VIC) Pty Ltd
- h. Brisbay Pty Ltd
- i. Cambridge Management Services Pty Ltd
- j. Capitol Body Corporate Pty Ltd
- k. Change Strata Management Pty Ltd
- l. Structure Building Management Pty Ltd
- m. CMS Holdings (Mirvac) Pty Limited
- n. Shift Facilities Management Pty Limited
- o. Waratah Building Management Pty Limited
- p. Change Strata Management Pty Limited
- q. Advanced Community Management Pty Limited
- r. Adpen Strata Pty Limited
- s. Your Local Strata Pty Limited
- t. AM Strata Pty Limited
- u. Northshore Strata Management Pty Limited
- v. Place Portfolio Solutions Pty Limited
- w. SSKB Group

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Proudly owned by ASX-listed Johns Lyng Group

We may disclose your Personal Information to the members of the Group, our other related entities and to third parties that provide products and services to us or to you, via us.

Types of information we collect

Some examples of some personal information we might collect are:

- a. name;
- b. address;
- c. contact details (such as telephone numbers, addresses, and email addresses etc.);
- d. date of birth;
- e. job title;
- f. identification details (such as visa and work permit status, driver's license, and/or
- g. passport details;
- h. financial information; and
- i. payment details.

How we will collect and hold your personal information

We only collect and hold personal information by lawful and fair means.

We may collect personal information about you in a range of different ways, including when you:

- a. liaise with us on the telephone;
- b. send us correspondence;
- c. visit and interact with us through our website;
- d. apply for a position within our firm;
- e. provide information for the purposes of financial services our firm provides;
- f. have contact with us in person (e.g. via general networking, via attendance at our education events, or one-on-one meetings).

We will take steps to hold personal information in a manner which is secure and protected from unauthorised access.

Your information may be held in either a physical form or in electronic form on our IT system.

Where stored in electronic form on our IT system, we will take steps to protect the information against modification, disclosure or misuse by including such things as physical restrictions, password protections, internal and external firewalls, intrusion detection, site monitoring processes, and anti-virus software.

We will also endeavour to ensure that our service providers have protection for electronic IT systems and other necessary restrictions.

Disclosure to overseas recipients

We may choose to, if permitted by law, share and/or disclose your personal information with recipients outside of Australia.

We are required to notify you with a list of any countries which personal information may be transmitted to or disclosed where it is practical for us to do so.

At present, personal information is only stored on servers located in Australia.

Bright & Duggan may transfer your personal information to overseas countries including but not limited to the Philippines and India in order to perform one or more of our functions or activities. In these circumstances, we will take reasonable steps to ensure that the overseas recipient does not breach the Australian Privacy Principles in relation to the information.

Personal information may need to be disclosed to external service providers or third parties engaged by Bright & Duggan in order for those service providers to fulfil their service obligations to the firm. For example, outsourcing contractors and individuals who are resident in India who carry out certain tasks and do work for Capitol to assist in the performance of one or more of our functions or activities. Where personal information is disclosed to an external party, Bright & Duggan will take reasonable steps to ensure that the external party treats such information confidentially and in accordance with the Australian Privacy Principles.