

Privacy Policy

Traders In Purple commitment to privacy

Traders In Purple Pty Ltd (ACN 162 126 721), The Great People Company Pty Ltd (ACN 159 253 862) and their related entities (including the entities for each of our developments) (**Traders In Purple**) are committed to managing personal information in accordance with the Australian Privacy Principles under the Privacy Act 1988 (Cth) and in accordance with other applicable privacy laws. This document sets out our policies for managing your personal information and is referred to as our **Privacy Policy**. In this Privacy Policy, “we” and “us” refers to Traders In Purple and “you” refers to any individual about whom we collect personal information.

This Privacy Policy also provides information about how you may access your personal information, seek correction of your personal information and make complaints if you think we have breached any privacy laws and how we deal with such complaints.

About Traders In Purple

Traders In Purple is a private development and construction company that sets out to create developments that have a positive, enduring impact on the local community and enhance their environment.

What information does Traders In Purple collect about you?

The type of personal information we collect and handle varies for different parts of our business operations and includes personal information about our purchasers, suppliers, contractors, job applicants and visitors to our websites and sites.

(a) Purchasers

When you enquire about our properties or developments, a record is made which includes your personal information.

The type of personal information that we collect will vary depending on the circumstances of collection and the kind of service that you request from us, but will typically include:

- (i) your name, e-mail, phone, postal address and other contact details;
- (ii) information relevant to your interest in a property or development, such as property or development requirements, buyer status (investment or owner occupier), budget, timing, and how you wish to purchase a property (including whether through a Trust, Self-Managed Super Fund (SMSF), or Company);
- (iii) any additional personal information you provide to us, or authorise us to collect, as part of your interaction with Traders In Purple, e.g., if you provide us with details about your family life relevant to your property needs.

We may also collect the above personal information if you purchase a property and other information such as your date of birth, information for identification (including driver's license, passport or other government identification) and your residency and citizenship status.

(b) Other individuals

Traders In Purple may collect personal information about other individuals. This includes members of the public who participate in events and community information sessions we are involved with. The kinds of personal information we collect will depend on the capacity in which you are dealing with Traders In Purple. Generally, it would include your name, contact details, and information regarding our interactions and transactions with you.

If you are participating in an event we are managing or delivering, we may take images or audio-visual recordings which identify you.

We generally do not collect personal information about children, but may do so, for example, when children participate in events we are involved with. Where children do not have sufficient maturity and understanding to make decisions about their personal information, we will require their parents or guardians to make decisions on their behalf.

(c) Visitors to our websites

The way in which we handle the personal information of visitors to our websites is discussed below.

(d) Suppliers and contractors

We collect personal information about suppliers and contractors, and other individuals who interact with Traders In Purple on a commercial basis. The personal information that we collect includes:

- (i) contact information including in relation to owners, directors, officers, partners of a partnership and other individuals working for our suppliers and contractors (including name, phone number, postal address and email address);
- (ii) if you are a contractor, insurance details, training records and certificates; and
- (iii) if you are a sole trader, account details if you request payment to an account related to an individual or any other account details that include personal information.

(e) Human resources

We collect personal information about job applicants, employees and contractors for recruitment and managing human resources, including information concerning

qualifications, skills, experience, character, screening checks (including reference and background checks), directorship, financial probity, identity, eligibility to work, and vocational suitability), employment history, training and safe work practices, contracts and terms and conditions, staff benefits, emergency contact details, performance, conduct, use of our IT systems, payroll matters, leave and taxation, banking or superannuation affairs. Traders In Purple may also monitor email and website usage of our employees and contractors from time to time.

(f) Sensitive information

In limited circumstances, Traders In Purple may collect information which is considered sensitive information. For example, if you are:

- (i) a prospective purchaser or purchaser and disclose health information that is relevant to your enquiry or purchase, when enquiring about or purchasing our properties or developments;
- (ii) injured at an event promoted or delivered by Traders In Purple, we may collect health information about you in an emergency or otherwise with your consent; or
- (iii) if you are a contractor or employee and there is an injury or other health information relevant to our engagement with you.

How does Traders In Purple collect your personal information?

Traders In Purple generally collects personal information directly from you. We may collect and update your personal information over the phone, by email, over the internet or social media, or in person. We may also collect personal information about you from other sources, for example:

- (a) your representatives including buyers' agents;
- (b) third party suppliers and contractors who assist us to operate our business including third party sales teams;
- (c) social media and third party property apps and websites such as real estate.com and domain; and
- (d) information that is publicly available.

We use CCTV cameras at our sites and sales displays for security purposes. We may collect images of you, when you are attending our sites and sales displays.

Why does Traders In Purple collect and use your personal information?

As a general rule, Traders In Purple only collects, holds, uses and discloses personal information reasonably necessary to carry out our business. We may also collect information to fulfil administrative functions associated with our business, for example

entering into contracts with you or third parties and managing relationships. The purposes for which Traders In Purple generally collects, holds, uses and discloses personal information depends on the nature of your interaction with us, but may include:

(a) to carry out our business including:

- (i) responding to requests for information and other general inquiries;
- (ii) promoting and selling our properties and developments;
- (iii) managing, planning, advertising and administering programs, events, competitions and performances;
- (iv) for market research and researching, developing and expanding our facilities and business;
- (v) informing you of our activities, events and facilities;
- (vi) responding to enquires and complaints; and

(b) for administrative, management and operational purposes including:

- (i) verifying your identity and information;
- (ii) quality improvement activities;
- (iii) statistical analysis and reporting;
- (iv) training staff, contractors and other workers;
- (v) risk management and management of legal liabilities and claims (for example, liaising with insurers and legal representatives);
- (vi) complying with our legal and regulatory obligations;
- (vii) obtaining advice from consultants and other professional advisers;
- (viii) where you are a job applicant, employee or contractor to managing our human resources;
- (ix) managing security, health and safety; and
- (x) complying with law,

and for other uses and disclosures for other purposes explained at the time of collection or otherwise as set out in this Privacy Policy.

We may use images or audio-visual recordings which identify you for promotional purposes where you would reasonably expect this to occur.

Traders in Purple is a 'reporting entity' under the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth) (AML/CTF Act). The AML/CTF Act requires us to collect information, which may include government issued identifiers, about you and certain individuals that are connected with you. Information collected for AML/CTF purposes is held separate from our operational data and is used solely for compliance with the AML/CTF Act. We use third party suppliers to assist in collecting your personal information for these purposes.

Consequences if we cannot collect your personal information

Where you do not wish to provide us with your personal information, some or all of the following may occur:

- (a) if you are a purchaser or prospective purchaser, we may not be able to respond to your requests for information or offer and sell our properties and developments to you;
- (b) if you are a contractor or supplier, we may not be able to engage you for your products or services; and
- (c) if you are a job applicant, we may not be able to consider your job application.

Who might we disclose your personal information to?

- (a) For prospective purchasers or purchasers

If you are a prospective purchaser or purchaser we may disclose your personal information to our sales agents and other contractors and your representatives.

- (b) For participants

If you are a participant in an event, we may disclose your personal information to our consultants, suppliers and venues where this is reasonably necessary for, and relevant to, the delivery of the event.

- (c) Disclosure to contractors and other service providers

Traders In Purple may disclose information to third parties we engage, including sales agents, contractors and service providers used for verifying your identity, data processing, data analysis, customer satisfaction surveys, information technology services and support, website maintenance/development, printing, archiving, mail-outs, and market research.

- (d) Other disclosures

Personal information may also be shared between related companies of Traders In Purple or to a third party organisation in the event we sell or transfer all or a portion of our business or assets.

Under the AML/CTF Act we may be required to disclose your information to AUSTRAC, a government financial intelligence unit. If this happens, we are legally prohibited from informing you.

Does Traders In Purple use or disclose your personal information for direct marketing?

Traders In Purple may use or disclose your personal information for the purpose of informing you about our properties and developments, upcoming promotions and

events, or other opportunities that may interest you by electronic messages (e.g. emails and text messages), online (e.g. through our website), by mail and other means, unless you opt out or we are subject to legal restrictions.

If you do not want to receive direct marketing communications, you can opt-out at any time by contacting us using the contact details below. If the direct marketing is by email or other forms of electronic communication you may also use the unsubscribe function.

If you opt-out of receiving marketing material from us, Traders In Purple may still contact you in relation to its ongoing relationship with you.

How does Traders In Purple interact with you via the internet?

Traders In Purple's websites use cookies and tracking pixels.

A "cookie" is a small file stored on your computer's browser, which assists in managing customised settings of the website and delivering content. We collect certain information such as your device type, browser type, IP address, pages you have accessed on our websites and on third-party websites.

A tracking pixel is an invisible image or Javascript snippet embedded within our website, <https://tradersinpurple.com/> and our project websites. We use tracking pixels to collect information about individuals who visit our website to collect information about that individual's use of the website and better adapt advertisements presented to you.

While these cookies and tracking pixels do not collect details such as your name and contact details, they collect information about your interactions on our website and from that information about your interests and activities that can be inferred. Some of these cookies and tracking pixels transfer this information to the relevant provider of the cookie or tracking pixel.

You can use the settings in your browser to control how your browser deals with cookies and tracking pixels. However, in doing so, you may be unable to access certain pages or content on our website.

Traders In Purple's websites may contain links to third-party websites. Traders In Purple is not responsible for the content or privacy practices of websites that are linked to our website.

Can you deal with Traders In Purple anonymously?

Traders In Purple will provide individuals with the opportunity of remaining anonymous or using a pseudonym in their dealings with us where it is lawful and practicable (for example, when making a general enquiry). Generally, it is not practicable for Traders In Purple to deal with individuals anonymously or pseudonymously on an ongoing basis. If we do not collect personal information about you, you cannot purchase our properties

and developments and may be unable to participate in our events, programs or activities we manage or deliver.

How does Traders In Purple hold information?

Traders In Purple stores information in paper-based files or other electronic record keeping methods in secure databases (including trusted third party storage providers based in Australia and overseas). Personal information may be collected in paper-based documents and converted to electronic form for use or storage (with the original paper-based documents either archived or securely destroyed). We take reasonable steps to protect your personal information from misuse, interference and loss and from unauthorised access, modification or disclosure.

Traders In Purple maintains physical security over paper and electronic data stores, such as through locks and security systems at our premises. We also maintain computer and network security, for example, we use firewalls (security measures for the internet) and other security systems such as user identifiers and passwords to control access to our computer systems.

Our websites do not necessarily use encryption or other technologies to ensure the secure transmission of information via the internet. Users of our websites are encouraged to exercise care in sending personal information via the internet.

We take steps to destroy or de-identify information that we no longer require.

Does Traders In Purple disclose your personal information overseas?

From time to time, we may engage contractors and services providers such as IT providers that are located outside of Australia and may disclose personal information to them as part of our ordinary business practices.

Artificial intelligence

Like other businesses, we may use artificial intelligence tools that handle personal information in compliance with privacy laws.

How can you access or seek correction of your personal information?

You are entitled to access your personal information held by Traders In Purple on request. To request access to your personal information please contact our privacy officer using the contact details set out below.

You will not be charged for making a request to access your personal information but you may be charged for the reasonable time and expense incurred in compiling information in response to your request.

We will take reasonable steps to ensure that the personal information we collect, use or disclose is accurate, complete and up-to-date. You can help us to do this by letting us

know if you notice errors or discrepancies in information we hold about you and letting us know if your personal details change.

However, if you consider any personal information we hold about you is inaccurate, out-of-date, incomplete, irrelevant or misleading you are entitled to request correction of the information. After receiving a request from you, we will take reasonable steps to correct your information.

We may decline your request to access or correct your personal information in certain circumstances in accordance with the Australian Privacy Principles. If we do refuse your request, we will provide you with a reason for our decision and, in the case of a request for correction, we will include a statement with your personal information about the requested correction.

What should you do if you have a complaint about the handling of your personal information?

You may contact Traders In Purple at any time if you have any questions or concerns about this Privacy Policy or about the way in which your personal information has been handled.

You may make a complaint about privacy to the privacy officer at the contact details set out below.

The privacy officer will first consider your complaint to determine whether there are simple or immediate steps which can be taken to resolve the complaint. We will generally respond to your complaint within a week.

If your complaint requires more detailed consideration or investigation, we will acknowledge receipt of your complaint within a week and endeavour to complete our investigation into your complaint promptly. We may ask you to provide further information about your complaint and the outcome you are seeking. We will then typically gather relevant facts, locate and review relevant documents and speak with individuals involved.

In most cases, we will investigate and respond to a complaint within 30 days of receipt of the complaint. If the matter is more complex or our investigation may take longer, we will let you know.

If you are not satisfied with our response to your complaint, or you consider that Traders In Purple may have breached the Australian Privacy Principles or the Privacy Act, a complaint may be made to the Office of the Australian Information Commissioner. The Office of the Australian Information Commissioner can be contacted by post to GPO Box 5218, Sydney NSW 2001, by telephone on 1300 363 992, or by email at enquiries@oaic.gov.au.

Application of legal requirements

We are subject to the Privacy Act 1998 (Cth) and a range of privacy laws. Nothing in this Privacy Policy is intended to limit our obligations or permitted handling of information under those laws. For example, under the Privacy Act, we may rely on certain exemptions including in relation to employee records.

Some of our collection and handling of personal information is also required or authorised by other laws, for example the Anti Money Laundering and Counter Terrorism Financing Act 2006 (Cth), Fair Work Act 2009 (Cth), Superannuation Guarantee (Administration) Act 1992 (Cth), Income Tax Assessment Act 1997 (Cth) and other tax laws, Corporations Act 2001 (Cth), work health and safety laws, and workers compensation laws.

How changes are made to this Privacy Policy?

Traders In Purple may amend this Privacy Policy from time to time, with or without notice to you. Any change to this Privacy Policy will become effective when we publish the revised Privacy Policy on our website at <https://tradersinpurple.com/privacy-policy/>. We recommend that you visit our website regularly to keep up to date with any changes.

How can you contact Traders In Purple?

The contact details for Traders In Purple are:

Traders In Purple privacy officer
GPO Box 3750 Sydney NSW 2001
info@tradersinpurple.com

1300 432 432

This Privacy Policy was last updated in August 2026.